



To: U.S. Department of Education
From: All4Ed
RE: Implementation of Title I/II-A Program Initiatives; Docket No.: ED-2021-SCC-0129
Date: November 2, 2021

All4Ed appreciates the U.S. Department of Education's (ED) efforts to gather information on the implementation of Title I/II-A of the Every Student Succeeds Act (ESSA). The information gathered through ED's surveys will provide important insights regarding the degree to which ESSA is effectively advancing educational equity for the nation's historically underserved students. In addition to offering our support for this data collection, we offer the following recommendations with the intention of increasing our understanding of ESSA's impact on high schools. Our hope is that this information will help ED determine what, if any, guidance may be helpful to states and school districts as they implement ESSA in the wake of COVID-19.

High Schools Identified for Comprehensive Support and Improvement (CSI)

ESSA requires states to identify high schools for CSI if one-third or more of their students do not graduate [ESSA Sec. 1111(c)(4)(D)(i)(II)]. We recommend that ED use its surveys as an opportunity to gather information regarding how states and districts are implementing this provision of ESSA. For example, the list of evidence-based school improvement models included in question 3-52 of the Local Education Survey could differentiate between high schools, middle schools, and elementary schools identified for CSI and include additional activities such as early warning indicator systems, college and career pathways, and expanding access to advanced coursework (e.g., dual enrollment, early college high schools, Advanced Placement, and International Baccalaureate).

In addition, ESSA provides states with flexibility to implement differentiated improvement activities in high schools that predominantly serve students who have exited high school without a regular diploma or students who are off-track to meeting high school graduation requirements [ESSA Sec. 1111(d)(1)(C)(i)]. Flexibility is also offered for schools that enroll fewer than 100 students [ESSA Sec. 1111(d)(1)(C)(ii)]. We encourage ED to collect information regarding how states have used this flexibility.

Transition From High School to Postsecondary Education

COVID-19 has led to declines in postsecondary enrollment that disproportionately impact low-income high schools. We encourage ED to collect information regarding the degree to which states, districts, and schools are using Title I funds to support students' transition from high school to postsecondary education, including leveraging data and technology to facilitate enhanced college advising, summer bridge programs, assistance to students and families in navigating the financial aid, college application and college selection processes, and other activities with a track record of improving postsecondary access and success.

Title I Funding for High Schools

Historically, high schools have received a modest level of Title I funding compared to elementary and middle schools. ESSA included new provisions intended to increase Title I funding for high schools, including flexibility for school districts to lower the threshold by which school attendance areas are ranked for Title I funding from a concentration of children from low-income families of 75% to 50% for high schools [ESSA Sec. 1113(a)(3)(B)]. In addition, additional flexibility was provided for school districts to use a feeder pattern to measure poverty in middle and high schools [ESSA Sec. 1113(a)(5)(B)]. We encourage ED to collect information regarding the degree to which districts are using these flexibilities.

In addition, we believe the most recent information pertaining to the distribution of Title I funds across grade spans was published by ED in 2009, based on data from SY 2004-05. Specifically, [*State and Local Implementation of the No Child Left Behind Act, Volume VI—Targeting and Uses of Federal Education Funds*](#) found that “high schools received 10 percent of Title I funds and enrolled 22 percent of all low-income students.” We encourage ED to use this survey as an opportunity to collect new data on the distribution of Title I funds across grade spans.

Conclusion

Thank you for the opportunity to comment on these important surveys. We look forward to working with ED to support the equity-focused implementation of ESSA and ensure all students, particularly those who have been historically underserved, graduate high school prepared for success in postsecondary education and beyond.