

United Way Worldwide

701 North Fairfax Street
Alexandria, Virginia 22314-2045
tel 703.836.7100



November 1, 2011

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Secretary Duncan:

Thank you for your leadership to ensure that our nation's children receive access to a high-quality education. While we are encouraged that the Senate Health, Education, Labor and Pensions Committee recently passed out of committee a bipartisan rewrite of No Child Left Behind, we appreciate the Department's efforts to use its existing regulatory authority to provide states with waivers from many of the burdensome and ineffective regulations in the No Child Left Behind law.

As you know, a lot of concerns have been raised around Optional Waiver 11. Currently, 21st Century Community Learning Centers not only expand the *time* that young people are learning, but also the *types of learning activities* they receive. It would be very unfortunate if "high quality expanded learning time" was interpreted by state education agencies (SEAs) and local education agencies (LEAs) as "more of the same" – just another hour of traditional schooling and traditional types of learning activities.

To help avoid this, **we recommend that you issue guidance which includes the following definition of High Quality Expanded Learning Time:**

High quality expanded learning time consists of efforts which complement the regular school day by:

- (1) promoting mastery of a broad set of academic, social, and civic skills necessary for a well-rounded education, and;
- (2) providing enrichment activities which differ from those provided during the rest of the school day, and which foster inquiry, critical thinking and engagement.

We also believe that strong partnerships between schools and community-based organizations are critical for building community ownership for change, and for providing the range of resources necessary to meet the social-emotional and academic needs of students. We ask that you more clearly articulate how schools can work in collaboration with organizations to make certain that all students receive the support they need to be successful in school, prepared for college, career and life.

Specifically, we applaud the existing requirement that "states must give priority to applications that are jointly submitted by a local educational agency and a community-based organization." **We recommend that you issue guidance which clarifies that the requirement that "states must give priority to applications that are jointly submitted by a local educational agency and a community-based**

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organization” is not waived by waiver 11, and remains in effect for both applications focused on after-school and those focused on expanded learning time.

We respectfully urge you to take these two actions to strengthen the role of community and extended learning partners to better fill in gaps in learning that help students meet rigorous standards. We believe that the Administration’s waiver proposal is a critical opportunity to strengthen public-private partnerships and promote a systemic, comprehensive approach to meeting the challenges influencing student achievement—including factors in and outside the school.

Please feel free to contact Lindsay Torrico at Lindsay.torrico@unitedway.org or (703) 836-7112 ext. 491, if further clarification is needed.

Sincerely,

Afterschool Alliance
First Focus Campaign for Children
Forum for Youth Investment
National Collaboration for Youth
United Way Worldwide

