



SPAN & Family Voices NJ comments on the Proposed Priorities and Definitions—Secretary’s Supplemental Priorities and Definitions for Discretionary Grants Programs

July 27, 2021

Thank you for the opportunity to comment on the Secretary’s Supplemental Priorities and Definitions for Discretionary Grants Programs. The SPAN Parent Advocacy Network (SPAN) is New Jersey’s one-stop for families of children birth to 26 across systems; our special priority are children and families at greatest risk due to poverty, disability and special healthcare needs, discrimination based on race, ethnicity, immigrant, language, or LGBTQ status, gender or gender identity, or other special circumstances. Family Voices-NJ is the New Jersey affiliate for Family Voices, dedicated to supporting the family voice in children’s healthcare. SPAN also serves as the Parent-to-Parent USA affiliate for NJ; the NJ Parent Training and Information Center and Family to Family Health Information Center; the state affiliate of the National Federation of Families for Children’s Mental Health (NFFCMH); and is represented on the State Special Education Advisory Council as well as NJ’s Early Intervention and Special Education State Performance Plan and State Systemic Improvement Plan Stakeholder groups. Our comments today are based on our extensive experience providing support to parents around education, healthcare, and family support including addressing disparities and inequities across systems. They reflect the experiences of our own staff, most of whom initially came to SPAN for help; our trained parent leaders; and the families, youth, and professionals we serve.

SPAN supports the comments of the National Center for Parent Leadership, Advocacy and Community Empowerment (National PLACE), of which we are a founding member, as well as the Consortium for Citizens with Disabilities and Leadership Conference for Civil and Human Rights Education Task Forces.

SUMMARY:

We understand that the Secretary is proposing “priorities and related definitions for use in discretionary grant programs.”

SUPPLEMENTARY INFORMATION:

As requested, we shall “clearly identify the specific section of the proposed priority or definition that each comment addresses.”

Proposed Priorities:

We acknowledge that this “document contains six proposed priorities.”

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Background

We strongly support that this “vision includes a respect for the dignity and potential of each and every student and their access to educational opportunity.” We strongly recommend including a respect for the dignity and contributions of each and every parent as part of the vision. We also support that the proposed priorities are aligned with evidence-based practices.

*Proposed Priority 1—Addressing the Impact of COVID–19 on Students, Educators, and Faculty.
Background:*

We strongly agree that the “COVID–19 pandemic negatively affected many students, educators, and faculty throughout the country...the pandemic has had a disproportionate impact on underserved students and laid bare the unique challenges faced by these students.”

Proposed Priority:

We agree with community needs assessments, addressing social-emotional health, technology access, etc. Children who had little or no access to technology were not able to access virtual learning. In our state, S. 3434 will allow students who were aging out but missed important transition services to access extra learning. Some children who had no previous mental health issues developed them over the course of the pandemic. For children with pre-existing mental illness, COVID-19 changes and losses exacerbated these.

Proposed Priority 2—Promoting Equity in Student Access to Educational Resources, Opportunities, and Welcoming Environments.

Background:

We strongly support the notion that improving “educational equity is a priority for the Biden-Harris Administration, with particular focus on supporting underserved students.”

Proposed Priority:

We agree that adequate resources and equity for underserved students must occur across all setting for all ages of students. We strongly support services that are “racially, ethnically, culturally, and linguistically inclusive.” We also strongly support the use of universal design for learning, which includes both learning environments, and teaching techniques for all students to access education. We also support experiential based learning, especially Structured Learning Experiences and Community Based Instruction for transition age students. We would support civics programs, professional development of diverse teachers to address implicit bias, equitable school funding, supports for English learners, addressing juvenile justice to reduce to school-to-prison pipeline, diverse community engagement, data collection to identify systemic issues, and school admission policies. We would emphasize professional preparation in higher education regarding underserved students, which includes children with disabilities, as this would enhance school district capacities to include students in the least restrictive environment. ***Deeply engaging with families is essential to ensure equitable services.***

Proposed Priority 3—Supporting a Diverse Educator Workforce and Professional Growth to Strengthen Student Learning.

Background:

We agree, “that diverse, well-prepared, and well-supported educators play a critical role in ensuring equity in our education system and student success and emphasizes the importance of promoting the continued development and growth of educators, including through leadership opportunities. It is also important that the diversity of our educator workforce reflect the diversity of our Nation.”

Proposed Priority:

We agree that this would include education of diverse candidates, professional development on Universal Design for Learning, addressing high poverty district needs, including adequate compensation and infrastructure. We agree this must also occur across setting for all ages. We also support diverse community stakeholder engagement. The most important of these concepts is addressing inequities. Underserved students experience inequities due to bias across their educational career. It begins with inequities in developmental screening, early intervention, delayed diagnosis, pre-referral/intervention and referral services with less interventions and a shorter time frame, overrepresentation and disproportionality in classification categories, segregated placements, and unequal discipline including the inappropriate use of restraints, which are ineffective, experienced as trauma, and result in injury or even death.

Proposed Priority 4— Meeting Student Social, Emotional, and Academic Needs.

Background: We agree that the “ongoing effects of the dual crises of COVID–19 and systemic racism have affected communities across this country. Countless students have been exposed to trauma and disruptions in learning and have experienced disengagement from school and peers, negatively...”

Proposed Priority:

Here again we strongly support addressing social-emotional health and highly recommend the use of resources from the Center on Social and Emotional Foundations of Learning (<http://csefel.vanderbilt.edu/>) and Positive Behavioral Interventions and Supports (www.pbis.org). We support mental health initiatives, safe schools, trusting home/school relationships, and trauma informed care. We also support community partnerships, civic activities, and addressing discipline disparities. We also strongly support harassment policies to address bullying and school climate. We also support, as does our state department of education, multilevel-tiered systems of support for all students. Here again we agree with addressing overrepresentation and disproportionality. Safe learning environments should also address environmental factors such as lead, adequate heating/cooling, crumbling old schools etc. We would recommend the use of Person-Centered Planning in developing strengths-based IEPs (<https://rwjms.rutgers.edu/boggscenter/projects/PCAST.html>). We agree with fostering relationships with government agencies yet there is fear in immigrant communities as well as distrust in others as sometimes these agencies were misused as a method of intimidation rather than help. For example, some families have been inappropriately reported to Child Protective Services in retaliation for disagreements in IEPs.

Proposed Priority 5—Increasing Postsecondary Education Access, Affordability, Completion, and Post-Enrollment Success.

Background:

We agree, “Postsecondary education, including career and technical education, is increasingly necessary for individuals to compete in a global economy.” Often, this is not thought of for underserved students, particularly those with disabilities, those with low-incomes, immigrants, and those of color.

Proposed Priority:

We agree with utilizing partnerships with community colleges, historically Black colleges, Tribal colleges, etc. Here again, we would recommend examination of admissions policies. These projects must have meaningful outcomes, such as a certificate or degree, rather than just providing the experience. We agree with connecting “students with disabilities, adults with disabilities, and disconnected youth to resources designed to improve independent living and the achievement of employment outcomes, which may include the provision of pre-employment transition services, transition and other vocational rehabilitation services under the Vocational Rehabilitation program, and transition and related services under IDEA.” We would recommend connections to Centers for Independent Living (www.ncil.org), and family organizations such as Parent Centers, as these are

among their core services. Life skills and financial literacy should be included in “skills necessary for success in the workforce and civic life.”

Proposed Priority 6—Strengthening Cross-Agency Coordination and Community Engagement to Advance Systemic Change.

Background:

We agree that schools “and campuses are often the center of the community for students and their families, providing students with the resources and referrals they need to meet their full potential. Ensuring that students and families have access to nutritious food, housing, health services, employment/financial services, and other community resources is pivotal to ensuring success in the classroom...” However, it is critical to understand that this is not the case for all families or all communities, so families and communities themselves must be deeply and impactfully involved in making decisions about how to coordinate across agencies and be engaged in systemic change.

Proposed Priority:

Data shows that the social determinants of health affect outcomes, including academic outcomes. Connections to community-based resources regarding food, utilities, housing, health, etc. will improve outcomes.

Types of Priorities:

We acknowledge that for an *Absolute priority*, only applications including those will be considered. We understand that under a *Competitive preference priority*, extra points may be given or preference given to an application meeting a priority.

We agree with the definitions provided in this document. We particularly agree that an *Underserved student* could include poverty, students of color, English learners, disability, migrant/undocumented, homeless, LGBTQ, foster care, and 3.4 million youth caregivers (<https://aacy.org>).

Thank you again for the opportunity to comment on the Proposed Priorities and Definitions.

Sincerely,



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To empower families and inform and involve professionals and other individuals interested in the healthy development and education of children, to enable all children to become fully participating and contributing members of our communities and society.