



June 12, 2023

U.S. Department of Education
Office of Elementary and Secondary Education

Submitted via email to: OESE.feedback@ed.gov

Re: Comments on the *21st Century Community Learning Centers Draft Guidance*

To Whom it May Concern,

I am writing on behalf of First Five Years Fund (FFYF) to share comments on the U.S. Department of Education's [draft non-regulatory guidance](#) for the Nita M. Lowey 21st Century Community Learning Centers Program (21st CCLC). FFYF is committed to ensuring all children from birth through age five have equitable access to affordable, comprehensive, high-quality early care and education (ECE) to support their healthy development and help them achieve their full potential in school and life.

21st CCLC grants support the establishment or expansion of a broad array of services for students during non-school hours (i.e., before school, after school, on weekends and during the summer) or extended learning during regular school hours. 21st CCLC specifically provides academic enrichment during non-school hours for children, particularly those who attend high-poverty and low-performing schools. Overwhelming evidence and research demonstrate that the first five years of a child's life are critical in terms of physical, social, emotional, and intellectual development. Quality ECE programs can play a pivotal role in setting children up to succeed in the K-12 system and beyond.

When reauthorized in 2015, the Every Student Succeeds Act (ESSA) shifted significant discretion to states and districts, presenting opportunities to expand early learning. While ESSA does not mandate spending on ECE, states and localities can bolster ECE in numerous ways to meet the needs of their community. We support the U.S. Department of Education's draft guidance to clarify how states can use 21st CCLC funds to support our youngest learners. FFYF applauds the inclusion of support services for pre-kindergarten children in section E-9 and suggests that the guidance go further to encourage states to invest 21st CCLC funds into ECE, support collaboration between state education agencies and CCDF administrators, and encourage partnerships with existing child care providers.

Encourage and Expand Investments in ECE

Section E-9 of the guidance clarifies that 21st CCLC funds may be used to support services for pre-K children, explaining that children who are not yet school-age but live within the service area of the program can be served to ensure kindergarten readiness. 21st CCLC should support state efforts to elevate, expand, and better integrate quality early learning in non-school hour programming. FFYF recommends that the guidance explicitly encourages states to serve children under age six who are

not yet eligible for kindergarten. Doing so will significantly contribute to 21st CCLC's goal of ensuring students are prepared to thrive in kindergarten and beyond.

E-9. May 21st CCLC funds support services for pre-kindergarten children?

"Yes. 21st CCLC programs primarily serve students in schools eligible for Title I schoolwide programs. Although "students" are designated in statute as the intended beneficiaries of the program, younger children who are not yet eligible for kindergarten and live in the attendance area of the schools being served **should be encouraged to** ~~may also~~ participate in program activities designed to ensure those children enter kindergarten ready to succeed."

Support Collaboration Between State Education Agencies and Child Care and Development Fund Administrators

Section C-6 of the draft guidance describes how state education agencies (SEAs) and Child Care and Development Fund (CCDF) administrators can work together to better serve the needs of children and families. Given both 21st CCLC and CCDF support children during out-of-school time, it is critical to ensure these federal programs collaborate and coordinate effectively. This is particularly necessary given that the federal programs have different funding flows, eligibility requirements, and administrative processes. By coordinating two of the largest funding sources for afterschool programming, states can effectively maximize supports and services for children and their families. Sixty-four percent of children served by CCDF are under the age of six, and young children are a critical population in need of quality programming.¹ FFYF suggests the following changes to Section C-6 to reflect this.

C-6. May an SEA collaborate with a Child Care and Development Fund (CCDF) Lead Agency to provide quality programming before and after school and during the summer?

".....Although there are meaningful differences between 21st CCLC and CCDF, including around eligibility and administration, both programs represent critical Federal resources available to support ~~school-age~~ children, **starting at birth**, during out-of-school time, making them ripe for collaboration and coordination. For instance, CCDF administrators **should** ~~could~~ work closely with the SEA to identify geographic areas where the need is greatest for out-of-school time programming, and direct contracts and grants to those areas using CCDF funds to ensure program stability while extending access to those ~~children students~~ who need help most, **including young children from birth through 5.**"

Encourage Collaboration with Existing ECE Providers

It is common for ECE programs to blend and braid funds from various sources to meet the needs of the children and families in their community, whether it is to extend hours of care, provide enrichment services, or increase the reach of their programs. The guidance should make clear when ECE providers are eligible to apply for 21st CCLC funds and should encourage recipients to prioritize partnering or collaborating with existing ECE providers who know the needs of children in their programs and are often eager to enhance the quality of their services.

¹ ACF, ["FY 2020 Preliminary Data Table 9 - Average Monthly Percentages of Children In Care By Age Group"](#)

D-1. What entities are eligible to apply for 21st CCLC funds?

“An “eligible entity” is defined as an LEA, community-based organization, **child care provider (as defined by the Child Care and Development Block Grant)**, Indian tribe or tribal organization (as such terms are defined in section 4 of the Indian Self Determination and Education Act (25 U.S.C. 450b)), another public or private entity, or a consortium of two or more such agencies, organizations, or entities. (Section 4201(b)(3)). An educational service agency, which is a regional public multiservice agency authorized by State law to develop, manage, and provide services or programs to LEAs (e.g., a 13 Board of Cooperative Educational Services (BOCES)), is also an eligible entity. (Section 8101(18)). Similarly, charter schools are eligible to apply.”

Enable States to Serve Pre-K Children During Regular School Hours

The previous guidance issued in 2003 included a section, G-6 (as shown below), that clarified that activities targeting pre-kindergarten children and adult family members may take place during regular school hours. This information has been omitted in the 2023 draft guidance and FFYF strongly recommends including this in the most recent guidance to ensure stakeholders understand this important provision and can serve young children and their families at times that are most convenient for them.

G-6. Can 21st CCLC activities take place during the regular school day?

“~~No.~~ The statute specifically indicates services are to be provided outside the regular school day or during periods when school is not in session, e.g., before school, after school, evenings, weekends, holidays, or summer. The program may offer services to students during normal school hours on days when school is not in session, e.g., school holidays or teacher professional development days. However, activities targeting pre-kindergarten children and adult family members may take place during regular school hours, as these times may be the most suitable for serving these populations.”

We believe it is of paramount importance that the 20-year-old guidance around 21st CCLC be updated and appreciate the opportunity to provide comments. While formal public schooling may not begin until kindergarten, children are learning at birth and often need support long before they are school-age. Considering studies show that ECE can have a 4X-9X return on investment per dollar, supporting our nation’s youngest children, including infants and toddlers, is a long-term investment that ensures children can build foundations for success. To support a robust continuum of care and education, investments in school-age children need to be paired with investments in ECE. The guidance should explicitly include and encourage investments in ECE so that states understand how to use 21st CCLC to support children starting at birth.

Sincerely,



Sarah Rittling
Executive Director
First Five Years Fund