

December 19, 2022

Miguel Cardona, Secretary of Education  
U.S. Department of Education  
400 Maryland Ave SW  
Washington, DC 20202

Re: Draft Bipartisan Safer Communities Act Stronger Connections Frequently Asked Questions – Nonregulatory Guidance (2022).

Dear Secretary Cardona,

I am writing on behalf of [Knowledge Alliance](#) (KA) with recommendations in response to the U.S. Department of Education’s (ED’s) request for comments regarding the draft [Bipartisan Safer Communities Act \(BSCA\) Stronger Connections Grant Program Frequently Asked Questions \(FAQs\)](#). Knowledge Alliance, a non-profit, non-partisan organization, is comprised of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Collectively, KA and its members promote the use of rigorous research to figure out “what works” and why and to improve student outcomes and then share those findings with policymakers, practitioners, and the general public.

Knowledge Alliance supports the creation and implementation of the Stronger Connections Grant program, which will provide critical investments nationwide to help states, districts, and schools create safe, healthy, and supportive learning environments. Our members are elated that ED has emphasized the importance of investing in the implementation and dissemination of evidence-based strategies and activities, as defined under the Elementary and Secondary Education Act (ESEA) Section 8101(21), to support the creation of safe and healthy schools. Additionally, KA applauds ED for recognizing, in Question B-7, the value of using the high-quality survey instruments developed by the Regional Educational Laboratories (RELs) to obtain input from educators and other school staff on how BSCA funds can be used in meeting the needs of individual schools. We have identified areas throughout the draft FAQs that could be further strengthened to encourage SEAs and LEAs to invest in high-quality evaluation and evidence-based resources to ensure the effective implementation of grant priorities. We appreciate the opportunity to provide feedback on the draft FAQs. Our comments on select questions below are numbered in order of how they appear in the original document.

## **Responses to Questions**

### **B-10: How might an SEA use its state reservation?**

Knowledge Alliance believes that ED could more explicitly mention that an SEA may use the five percent State reservation of Stronger Connections funds for evaluation purposes. We

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recommend adding a new sentence to clearly connect the five percent State reservation of funds to evaluation activities. Our proposed text is “SEAs may also use reservation funds for evaluations, such as for evaluation of the efficacy and impact of the grant program.”

### C-3: What should SEAs and LEAs consider in selecting evidence-based strategies supported by stronger Connections funds?

In addition to referring to IES’s What Works Clearinghouse, KA suggests that ED urge grant recipients to connect with their regional [Comprehensive Center](#), which provides high-quality intensive capacity-building services that help State clients to identify, implement, and sustain effective evidence-based practices. Additionally, this section of the FAQs (perhaps in the response to Question C-15) could highlight the [resources](#) provided by the entire Comprehensive Center network around trauma-informed practice.

### Additional Question Under Section C

Knowledge Alliance proposes that ED add a new question under section C of the draft FAQs: “How may funds be used to design and evaluate the use of funds to achieve intended goals?” Our membership believes strongly that investing in well-thought-out grant implementation with a well-thought-out logic model from the onset of receiving funds allows for more impactful programming long-term. Further, evaluation of the impact of activities that SEAs and LEAs carry out with BSCA funds depends on asking the right questions and implementing an evaluation methodology designed to answer those questions. We thus encourage ED to add the following FAQ:

C-X: How may funds be used to design and evaluate the use of funds to achieve intended goals?

The Department encourages SEAs to use funds to design and evaluate the efficacy and impact of the grant program in achieving its intended purposes. The Department recommends SEAs and LEAs invest in well-defined program implementation by designing their BSCA activities in a manner that begins with an understanding of the program’s goals and objectives. Various high-level questions can guide SEAs and LEAs through this process, such as: What is the program intended to accomplish? How would you know if it worked? If the program is a success, what would have happened? Once the program is defined, next is the process of creating a logic model that lays out the program’s theory by explaining how the program will work as well as intermediary and long-term outcomes. This specification of a well-thought-out logic model and the selection of high-quality, valid, and reliable outcome measures enables high-quality evaluation. SEAs are also able to invest funds towards ongoing, formative evaluation of their programs to ensure that the program is effectively supporting all students.

Evaluation is important in ensuring that the programs we are using in our schools and classrooms are successful. Instead of asking “Does my program work?” one might ask, “To what extent does the program work?” “Does the program always work?” or “Does this program work differently for different groups of students?” A common criticism regarding evaluation is that it takes time and resources that could be dedicated to educating students. However, evaluation, when done properly, can result in better-quality practices being delivered more effectively to establish safe, healthy, and supportive learning opportunities and environments. The Office of

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Elementary and Secondary Education's [Evaluation Matters: Getting the Information You Need From Your Evaluation](#) is a guide to help effectively build evaluation into program planning and decision-making. Additionally, SEAs and LEAs can engage evaluation partners through the RELs' program or other external partnerships to help develop and implement an evaluation plan that results in meaningful information that guides decision-making.

Please reach out to Rachel Dinkes at [rdinkes@knowledgeall.net](mailto:rdinkes@knowledgeall.net) with any questions.

Best,



Rachel Dinkes, President