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February 22, 2024

Dr. Michelle Daley
U.S. Department of Education
400 Maryland Avenue,
Washington, DC 20202-6132

Dear Dr. Daley,

I am writing to provide the comments of Knowledge Alliance (KA) on the Notice of Proposed Priorities, Requirements, Definitions, and Selection Criteria (NPP) for the Comprehensive Centers (CC) Program as published by the U.S Department of Education (ED) on January 23. 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 to improve student outcomes and then share those findings with policymakers, practitioners, and the general public.

Thank you for the opportunity to comment on this notice. Knowledge Alliance believes that the next competition for CCs, and any reconfiguration of the current system for providing technical assistance and other services through those centers, must incorporate certain key elements. Specifically, the system of technical assistance, capacity-building, training, and professional development provided through the CCs must:

- Ensure that CCs deliver high-quality, high-impact technical assistance and capacity-building services that assist States, districts, and schools in addressing their most pressing needs, improving student achievement, and closing achievement gaps and educational inequities;
- Ensure and sustain strong cooperation and sharing of expertise across the centers on important issues addressing challenges of policy and practice;
- Provide services efficiently and avoid duplication of effort;
- Promote innovative ideas and evidence-based strategies on important educational priorities;
- Support states, districts, and schools in addressing priorities and challenges in evidence-based ways that fit the specific local context and needs;
- Ensure that the CCs support each State, including rural and native communities, that could be overlooked when resources are stretched thin within a region;
- Allow for technical assistance provided by CCs to be locally driven and primarily derived from the needs identified by the State, local educational agency (LEA), or school; and
- Include a unifying body that assists with coordination of efforts across all centers and that is nimble so as to address common issues and needs across States as they arise.



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Knowledge Alliance supports several of the key elements of the system provided for in the NPP. We support the various foci and priorities designed to ensure that the CCs provide support and assistance to schools serving students with the greatest need, students from low-income families, and traditionally marginalized students. Additionally, KA supports the focus of this NPP on ensuring that the work of the CCs is responsive to the needs of schools, districts, and States by requiring stakeholder engagement and needs-sensing activities. We believe that, if technical assistance is driven by the needs of those the centers serve and if resources are targeted to populations most in need, the CCs will play a vital role in improving our education systems for all students.

Reconfiguration of Comprehensive Centers and New Content Centers

The NPP proposes a reconfiguration of the regions served by the Regional Comprehensive Centers (RCC), replacing the 19 current regions with 14 regions and four Content Centers. While we generally take no position on the proposed reconfiguration of regions or content centers, KA supports a region dedicated to serving the needs of Bureau of Indian Education (BIE schools). The annual appropriations acts have annually directed the Department to ensure that the BIE schools have access to CC assistance, and because those schools educate a persistently underserved population and have a major need for high-quality technical assistance, Knowledge Alliance supports ED's decision to stand up an RCC dedicated to serving the needs of BIE schools. In addition, KA believes that the National Comprehensive Center (NCC) serves as a coordinating centralizing body for the CC system and supports the inclusion of the NCC in this competition. While Knowledge Alliance generally takes no position on the inclusion or topics of the Content Centers, we do note the importance of the regional needs identified by the Regional Advisory Committees and expect the CCs to address such needs.

Clarifying Questions for ED

Funding Question: KA emphasizes the imperative for increased financial support to effectively cater to the needs of States, districts, and schools, particularly in small and rural areas. We are curious about the methodology the Department will employ in formulating the funding distribution. Could you provide insights into the formula's specifics and how it will distinguish between regional, content, and national center allocations? We strongly encourage the Department to allocate increased funds to these centers in the fiscal year 2025 budget request, as the CCs play a crucial role in providing the only State-directed technical assistance in the country.

FTE Requirements: KA agrees with the language in the NPP stating that successfully managing a Center, developing deep customer-focused relationships with States, and managing complex projects with varied stakeholders requires significant investment of personnel time and leadership. However, under the proposed program requirements, there is a requirement that Centers must strive to achieve as close to full-time equivalency as practical for all personnel in key leadership and service delivery roles. Unlike



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previous years, this NPP requests that service-delivery roles are as full-time as possible. This approach will require that staff on CCs agree to work at-risk because they would be devoted to a single project with an end date. Many organizations avoid single project staffing because it can lead to fluctuations in workforce size and make it challenging to maintain stability within an organization. In addition, for employees, the lack of a sense of long-term stability in their work can lead to stress and increased turnover rates. Thus, KA recommends removing the requirement for close to FTE for staff in service delivery roles.

Evaluation and Performance Management Plan: The term “performance management plan” is not defined in the NPP and appears to be used inconsistently. Also, we note that in the 2019 CC NPP, ED required applicants to present a proposed evaluation plan for the project. In the current NPP, ED requires applicants to present a performance management plan that describes the applicant’s proposed approach to meeting the program requirements. KA would appreciate clarification from ED on the difference between a performance management plan and an evaluation plan and why ED decided to switch to requiring a performance management plan instead of an evaluation plan. We encourage ED to include an evaluation plan requirement as evaluation is a critical tool for assessing the impact of the program and for identifying successful practices that can lead to improvements in the CC program.

Performance Measures: In the 2019 CCs competition, ED included performance measures, as required under the Government Performance and Results Act of 1993 (GPRA), and ED subsequently used those measures to determine the effectiveness of each Center. We note that while, this NPP, under Program Requirements, states, “The performance management system must include strategies to report on defined program performance measures,” the NPP does not specify the performance measures against which the centers will be required to collect data and measure progress. We thus seek clarification on whether the 2019 measures are still applicable or, if not, what GPRA performance measures the Department is intending to use in measuring the performance of the new CCs.

Organization of Proposal Guidance: The NPP contains numerous proposed priorities, requirements, definitions, and selection criteria. For example, an application to operate a Regional Center will be judged against approximately 12 selection criteria (including numerous sub-criteria) and will need to address:

- 7 focus areas for services
- 4 Proposed Priorities for Regional Centers
- 9 Proposed Program Requirements for All Centers
- 8 Proposed Program Requirements for Regional Centers
- 8 Proposed Application Requirements for All Centers
- 2 Proposed Application Requirements for Regional Centers



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Given the number of priorities, program requirements, and application requirements, KA suggests that ED provide guidance on the point values for each of the criteria and further suggest that ED provide guidance on how applicants can best organize their proposals. This guidance would help the field produce higher-quality applications.

Thank you again for the opportunity to comment on this notice. If I can be of any assistance, please do not hesitate to contact me.

Sincerely,



Rachel Dinkes
President and CEO

