

**Comments on the**

**US Department of Health and Human Services and US Department of Education Draft  
Policy Statement on Family Engagement from the Early Years to the Early Grades**

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On behalf of NAFSCE's Board of Directors, we want to commend the two Departments for a very thorough and well thought-out statement of policy on the importance of family engagement in their children's early years. On July 22, 2015, NAFSCE Board member Deborah Roderick Stark submitted our organization's remarks to the public input session sponsored by the Interagency Policy Board. It would appear that nearly every recommendation she made, all of which are rooted in a systems approach as recommended by the two excellent Frameworks that your agencies have developed, has found its way into this policy statement. In her remarks, Ms. Stark emphasized four critical points:

1. Family engagement is an essential strategy for promoting child development and improving student learning.
2. This is not about "fixing parents," it is about mutually respectful, culturally and linguistically responsive parent-teacher collaboration to support children's achievement.
3. Both educators and families need support to collaborate, as well as information about effective practice.
4. Family engagement is a shared responsibility -- this must be made clear.

All four of these points are embedded across the core principles and recommendations in the policy statement. Thank you.

In our first set of comments, we address a few points of clarity. In our final comment, we address a larger issue.

First, we feel it would be helpful to propose a clear definition of family engagement at the beginning of the statement. At NAFSCE, we use this definition:

Family engagement is a *shared responsibility* between home and school. When done well, early childhood programs, schools and other community organizations commit to working with families in *meaningful and culturally and linguistically respectful* ways, and families commit to supporting their children's learning and development. Family engagement is *continuous across a child's life* and *carried out everywhere children learn* – at home, in early childhood programs, in school, in after-school settings, in faith-based institutions, and in community programs. (Note that we have highlighted terms in our definition that are used throughout the policy statement.)

Second, we feel that the age range covered by this statement is too vague -- "across early childhood and early elementary settings." We recommend that the span be made explicit, and that it be from birth through third grade, or ages 0-8. This covers a critical developmental period in a child's life. Not only should children be kindergarten-ready at age five, and but also should be proficient in basic literacy and math skills at the end of third grade. Both are powerful predictors of future success in school and in life. In addition, the statement should clarify that its intent is to establish the foundation for continuing family engagement throughout a child's years in school, not just through third grade.

Third, we applaud the emphasis on children's social-emotional and behavioral health, but feel they do not take priority over intellectual development, which we feel is equally important,

especially in literacy and math. We believe in the development of the “whole child” and recommend that the policy statement make it clear that social-emotional health and cognitive development are deeply interconnected.

Finally, our last comment addresses a larger issue, to whom or what this policy statement applies. The statement lays out specific, detailed and useful recommendations for state and local agencies, as well as for schools and early childhood programs. It does not, however, stipulate what USDE and HHS should do to support the implementation of these recommendations. To paraphrase the Departments’ draft statement, *federal* policies and investments directly influence *state* investments, policies and practices. In turn, these influence *local* program and school policies that drive teacher and provider practices.

A policy should commit the agency that issues the policy to a course of action. We strongly recommend that the two Departments follow their own advice to states, and include recommendations for the leaders and staff of their own agencies in this statement, particularly in the following areas:

- **Plan and prioritize:** USDE and HHS should emphasize family engagement as a critical component of children’s learning and development across all their programs.
- **Invest and allocate:** Family engagement is central to children’s development, as this policy states. This priority should be reflected in the Departments’ budgets, in spending and research priorities, in ratings criteria for competitive grant programs, and in guidance on the use of federal funds.
- **Establish policies that support family engagement:** The Departments should conduct policy reviews to identify, strengthen and promote effective family engagement practices. In addition, USDE and HHS should incorporate research-informed family engagement indicators into monitoring protocols and quality rating systems to ensure that strategies and practices are well and fairly assessed.
- **Communicate consistent messages that support strong family engagement:** USDE and HHS should provide clear messages to staff, state agencies, local schools and early childhood programs, reinforcing that *all* families must be treated with respect and valued as experts on their children and as equal partners. In our increasingly diverse communities, providing linguistic access is critical to inclusive practice. For example hiring bilingual staff and having a system in place for interpretation and translation to ensure language accessibility for all families.
- **Establish workforce capacity building that supports family engagement:** Incorporating family engagement into all programs requires knowledge, skills and organizational support for staff at all levels. The Departments should provide professional development and technical assistance to build capacity for carrying out these recommendations and providing guidance and support for their own staffs as well as to states.
- **Develop and integrate FE indicators into existing data systems:** The Departments should collect data about the extent to which family engagement strategies and practices are being implemented in state and local programs. The data will be valuable for policy and program improvement efforts, guidance for future research and evaluation, and public accountability.

**Create an Office for Family Engagement within each agency:** To coordinate and oversee the implementation of this policy, we recommend that each Secretary create an Office for Family Engagement, headed by a senior-level staff member to serve as liaison between the Secretary and Departmental divisions to ensure that the policies are further developed and carried out. These offices would anchor a standing Interagency Task Force to coordinate the work of the two agencies and to connect the two Frameworks. Such an office not only would provide tangible

evidence that HHS and USDE are serious about elevating family engagement; it would also designate and hold accountable staff to carry out the assignment.

For the U.S. Department of Education, we strongly recommend that it develop a companion policy statement on family engagement that covers ages 9-18. Engaging families in children's learning and development from birth through career is critical to guiding children successfully through the system. We believe that the USDE should take the lead in emphasizing the need for continuous and well-articulated family engagement from birth through high school, and in connecting the two Family Engagement frameworks.

We appreciate the opportunity to comment on this important policy statement and look forward to collaborating with the department in disseminating the final version to the field.

Sincerely,



Vito J. Borrello  
NAFSCE Executive Director

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