



September 15, 2021

Submitted via <https://www.regulations.gov/>

Institute of Education Sciences
U.S Department of Education
400 Maryland Avenue, SW
Room 4160, Potomac Center Plaza
Washington, DC 20202–7240

Re: Request for Information on the Department of Education’s Fiscal Year (FY) 2022-2026 Learning Agenda [Docket ID ED-2021-IES-0118]

Dear Commissioner Soldner:

Thank you for the opportunity to offer information in support of the U.S. Department of Education’s (ED’s) FY 2022-2022 Learning Agenda. We appreciate your commitment to creating a learning agenda that helps to establish a continuum of connection and engagement for students and families from prekindergarten through grade 12.

Attendance Works is a national, non-profit initiative that seeks to advance student success and narrow equity gaps by reducing chronic absence. We operate at the local, state and national level to build public awareness, advance innovative practice, advance effective attendance policy and also catalyze needed research. We use our work with local and state level educators and community partners to identify gaps in research and then leverage our strong relationships with researchers to bring these questions to their attention and solicit their further feedback. The questions outlined in this letter reflect that interactive process.

Broadly defined, chronic absence is missing so much school for any reason that a student is at risk of not reading in the early grades, lower achievement in middle school and dropping out of high school. Chronic absence data is best used for positive problem solving and early intervention rather than punitive action. It is a key data point for understanding the scope and scale of the impact of covid-19 on student learning and the effectiveness of our recovery efforts. At the same time, whether or not students show up to class as schools reopen offers

invaluable real-time information about whether students and families are engaged and if students are present to benefit from the teaching, curriculum and support being offered.

Early data on chronic absence from the pandemic already suggests that the pandemic is exacerbating existing inequities among Black and brown youth, students with IEPs and 504 plans, along with those eligible for Free and Reduced Meals or living in communities of concentrated poverty.

A proactive research agenda that deepens our ability to leverage available data on attendance and absences is key to a learning agenda that advances a just and equitable system of free public education that meets the needs of 21st century post-covid 19 learning. Such research must also allow schools to use data for the purposes of early warning even if they must shift to remote instruction in the face of challenges (e.g. pandemics, fires or inclement weather).

We encourage the US Department of Education to consider investing in research that helps answer the following questions:

1. **Does missing 10% of school days predict worse outcomes (at a minimum worse attendance) in distance and blended learning as well as in-person learning?** How does this vary by age (prek-12), student population, community demographics (rural, urban, suburban)?
2. **What explains the disproportionate levels of chronic absence experienced by student groups, Black, Latino, Native American, students living in poverty during the pandemic?** What is the connection to structural challenges (e.g. digital divide, lack of access to health care, unstable housing, lack of access to quality early childhood) related to the neighborhood and community or within schools and districts (e.g. dilapidated facilities, inequitable teacher compensation) ?
3. **What do we know about the students who experienced improvements in attendance during distance or hybrid learning or in-person learning during the pandemic?** For whom and under what circumstances did attendance improve? What were the contributors? What are the implications for future practice?
4. **What are the characteristics of the districts that stabilized or had relatively lower levels of chronic absence during the pandemic?** How did they use data to inform action? How did family and student engagement make a difference? To what extent did community partners play a role? What investments did they make in capacity-building of administrators and school staff?
5. **What are the most predictive early warning metrics for students in distance and blended learning?** (e.g. not logging on on a daily basis, failing to submit assignments,

not participating in virtual synchronous learning) How does this vary by age, student population, community demographics (rural, urban, suburban)?

6. **What are effective, evidence based practices for improving student attendance in distance and blended learning?** How does this vary by age (preK-12), student population, community demographics (rural, urban, suburban)? What are the most cost-effective approaches?
7. **How do attendance policies that define a narrow band of legal absences connected to a truancy system for all other absences contribute to student-push out, disengagement, and even criminalization?** To what extent is this adverse impact of such policies concentrated among students of color and affected by poverty. How is this further exacerbated by the challenges created by Covid-19?
8. **What is the long-term impact of preschool experiences on chronic absence and attendance in elementary school?** What is the effect of preschool suspensions and expulsions? Are there observable benefits from strategies such as attending to social emotional learning and deepening family engagement?

To learn more about the impact of chronic absenteeism on student outcomes and the relationship between attendance and conditions for learning, please read these reports.

- [Chronic Absence Patterns and Prediction During Covid-19: Insights from Connecticut](#) by Attendance Works and the Connecticut State Department of Education reveals troubling increases in chronic absence for remote learners, especially for Latino and African American students and found that chronic absence in the Fall predicted poor attendance later in the year.
- [Using Chronic Absence to Map Interrupted Schooling, Instructional Loss and Educational Inequity: Insights from School Year 2017-18 Data](#) by Attendance Works and the Everyone Graduates Center provides a national and state analysis of how many schools face high levels of chronic absence.
- [Using Chronic Absence Data to Improve Conditions for Learning](#), by Hedy N. Chang, David Osher, Mara Schanfield, Jane Sundius and Lauren Bauer describes how chronic absence and conditions for learning are interconnected issues that can have an impact on a child's educational success.

Thank you for considering our recommendations. For additional information, please contact Hedy Chang, Executive Director of Attendance Works at hedy@attendanceworks.org

Sincerely,

