



**To:** U.S. Department of Education ([OESE.feedback@ed.gov](mailto:OESE.feedback@ed.gov))

**From:** Abbie Evans, Vice President of Government Relations and Strategic Partnerships, MENTOR

**Subject:** MENTOR Comments on Draft Non-Regulatory Guidance for Title IV Part B, Nita M. Lowey 21<sup>st</sup> Century Community Learning Centers Program

**Date:** July 7<sup>th</sup>, 2023

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On behalf of MENTOR, our network of Affiliates, and youth mentoring programs across the country, we thank you for the opportunity to comment on the Non-Regulatory Guidance for the 21<sup>st</sup> Century Community Learning Centers Program. MENTOR is the unifying national champion for expanding quality youth mentoring relationships and connecting volunteers to mentoring opportunities in their local communities. Today, we know that approximately 1/3 of all youth in America want a mentor, but can't find one. Collectively, 2/3 of all youth will experience a period of time where they needed a mentor but did not have one. MENTOR seeks to close this "mentoring gap" and ensure our nation's young people have the connection and support they need to succeed at school, in the community, and in the workforce. We seek to leverage resources and provide the tools and expertise that local programs – including those within schools, community-based organizations, faith-based institutions, and the private sector – require to provide high-quality mentoring for young people who need it most, build greater awareness of the value of mentors, and positively inform public policy in order to bring support and opportunity to young people in need.

We appreciate your hard work in drafting this new guidance that will work to provide additional clarity for the field and examples and best practices of quality programming. We are especially encouraged by the support in this guidance of braiding funding. Allowing braiding of funds will be especially important given the coming sunset of funding sources that have helped grow and sustain youth mentoring programs (Elementary and Secondary School Emergency Relief (ESSER); Bipartisan Safer Communities Act). We encourage the Department to provide specific examples of successes in braiding funds to deliver quality programs throughout.

This guidance comes at a critical time. Young people are reporting mental health concerns, disconnectedness, disengagement, and a lack of relationships at concerning, growing rates. As noted in the Surgeon General's Advisory, "Our Epidemic of Loneliness and Isolation: the Healing Effects of Social Connection and Community," quality youth mentoring programs have the expertise and ability to help re-connect our country's social fabric. Furthermore, MENTOR's Affiliates, which provide free training and technical assistance to any mentoring program that requests it, are "external organizations" that SEA's could refer grantees to receive evidence-based training that ultimately help lead to the outcomes that we hope the 21<sup>st</sup> CCLC program will achieve.

Though the mentoring movement stands ready to serve, we are concerned that many effective programs – especially smaller, grassroots community-based organizations that lead high-quality work in high-need communities – are not being reached by 21<sup>st</sup> CCLC. As such, **we have two overarching requests: (1) That the final guidance is filled with many more examples and practices for the field – especially successful collaborations between mentoring programs and schools; and (2) That the**

**Department releases an additional round of draft guidance for public comment after this round of stakeholder engagement and input.**

- Administrators may have a difficult time conceptualizing how a school-based mentoring program would work in their community. It is important for potential grantees to have the knowledge that school-based mentoring is *highly customizable*: approaches could include one-to-one, group, peer, community-based, site-based, or hybrid models and adult (school personnel or volunteers from community-based providers/workplaces, etc.) or “near peer” student mentors. Further, resources – like OJJDP’s National Mentoring Resource Center (NMRC) – can help administrators design and implement their programs in accordance with quality standards and practice. Additional resources, like the Mentoring Connector, can help schools identify potential programs to partner with in their community.
- While the NMRC is mentioned in passing in the guidance in section D-18, we recommend adding additional language (either in D-18 or elsewhere in the document) describing the function of the Center and how it could help grantees. School-based and school-connected mentoring initiatives will need structure and support to help achieve the goal of facilitating academic gains or improving in school connectedness or attendance. The guidance could include reference to the six evidence-based *Elements of Effective Practices for Mentoring*: recruitment, screening, training, matching/initiating, monitoring/support, and closure best practices.
- Mentoring relationships are, at their core, what the 21<sup>st</sup> CCLC program is all about, and should be a part of every grantee’s application and strategy to achieve the purposes of this program.

Below are additional comments on the guidance, overall:

- **Expand on the importance of partnerships.** While the draft guidance includes referential language to collaboration with community-based organizations, additional language that makes explicit preferences for partnerships and identifies strong examples, such as those between mentoring programs and schools, would further help forge these relationships. Community-based providers as a category of subgrantees has fallen from more than 30 percent of all subgrantees 15 years ago to less than 10 percent in the 2020-21 school year. More can be done in this guidance to provide additional resources to address some of the challenges these providers experience, such as data-sharing policies and lack of support for the grant writing process.
  - Smaller and independent providers could especially benefit from examples of advanced/forward funding policies, shared services agreements, and liability insurance coverage.
- **Encourage community input.** 21<sup>st</sup> CCLC grantees are designed to be locally responsive to the students, parents, and the schools within a particular community. As such, there should be opportunities for community input at all levels:
  - *State advisory boards*, which could include experts in providing high-quality student experiences and representatives from grantees with the purpose of providing feedback to the state Department of Education and encouraging best practice and training.
  - *Local advisory boards*, to ensure sub-grantees are engaging with the community to determine program improvement, sustainability, and operations throughout the duration of the grant.

- *Student councils*, to help grantees direct funds to learning experiences that are interesting and relevant to them, and give students agency in the program.

Lastly, some specific suggestions to the current draft:

- **B-4: How does an SEA apply for its 21<sup>st</sup> CCLC application?**
  - *Recommendation: Include state advisory boards as a requirement or best practice.* Through state advisory boards, the Department can ensure that diverse programs from communities of all types can create an important communication loop with the SEA.
- **C-1: May an SEA reserve a portion of its funds for state use?**
  - *Recommendation: Further highlight the role that training and technical assistance plays in program quality.* Quality training can be found across agencies and at all levels of government. OJJDP's National Mentoring Resource Center, for example, can deliver evidence-based training to any 21<sup>st</sup> CCLC grantee requesting it, as long as they have an element of mentoring in their programming.
- **C-5: Must an SEA provide a list of pre-screened external orgs?**
  - *Recommendation: Provide examples to help clarify this language.* Specifically, examples of what external organizations have helped grantees to achieve and the specific support they were able to provide in training and capacity building.
- **D-1: What entities are eligible to apply for 21<sup>st</sup> CCLC funds?**
  - *Recommendation: Mention examples of specific groups within each eligible entity, such as nonprofits (nationally-affiliated or not); institutions of higher education, faith-based organizations, etc.* An example of a successful consortium of eligible entities could also be helpful.
- **D-2: What "private entities" are eligible for 21<sup>st</sup> CCLC funds?**
  - *Recommendation: Keep language from 2003 guidance around community and faith-based organizations.* Specifically consider including: "Faith-based and community-based organizations are encouraged to apply for local grants on the same basis as other applicants. Funds shall be used solely for the purposes set forth in this grant program. No funds provided pursuant to this program shall be expended to support religious practices, such as religious instruction, worship, or prayer. FBOs may offer such practices, but not as part of the program receiving assistance, and FBOs should comply with generally applicable cost accounting requirements to ensure that funds are not used to support these activities."
- **D-4: What must an SEA include in its local application?**
  - *Recommendation: With acknowledgement that this language is straight from the law, we encourage recommending additional questions about how the applicant would implement best practices that are not required by statute, but have been proven by research to achieve strong outcomes – such as youth voice in program design,*

community partnerships, program quality and training, whole child wellness, and relationship-centered practices.

- **D-9: Must a non-LEA applicant for a 21<sup>st</sup> CCLC subgrant collaborate with the schools that students who will be served by the 21<sup>st</sup> CCLC program attend?**
  - *Recommendation: Use this space, or a new section, to emphasize that collaboration with community-based organizations is critical to the program (it's in the name!). Provide resources that address some of the most common difficulties that community-based organizations face in these partnerships, such as data sharing.*
  
- **D-13: What process must an SEA use to review its 21<sup>st</sup> CCLC local applications?**
  - *Recommendation: Add examples of potential reviewers, such as training and technical assistance providers/experts; program providers, researchers, etc.*
  
- **D-18: May an SEA include other priorities in its local 21<sup>st</sup> CCLC subgrant application?**
  - *Recommendation: Alter the mentoring program example language to focus on the most up-to-date resources available. Many of the resources cited on the youth.gov website are outdated; as such, the site should be updated, or the guidance can simply encourage readers to visit the National Mentoring Resource Center for additional assistance.*  
Sample language:
    - “Establishing quality mentoring programs built on strong relationships among students, mentors, schools, community-based providers, and families. The Department’s You for Youth (Y4Y) website offered a webinar focused on how 21<sup>st</sup> CCLC grantees can partner with existing community-based mentoring programs or create one themselves. The National Partnership for Student Success provides free training and technical assistance for programs of all types through the National Mentoring Resource Center, which coaches on evidence-based best practices from the [Elements of Effective Practice for Mentoring](#). LEA’s and grantees can use the [Mentoring Connector](#) to identify, contact, and potentially partner with youth mentoring programs in their community.
  
- **D-24: On what basis does an SEA make continuation awards?**
  - *Recommendation: Bring back language from previous guidance “that, particularly in the start-up period of a grant, there are usually some carryover funds given that it often takes more time than initially thought to hire all staff, recruit program participants, and develop a broad range of program services.”*
  
- **E-5: How can 21<sup>st</sup> CCLC programs support increased student attendance and engagement, particularly in middle and high schools?**
  - *Recommendation: Shift focus in language to programs rather than individual relationships. Effective mentoring relationships that achieve student attendance and engagement are usually highly structured.*
    - *Sample language: “...improve student attendance by (1) enhancing students’ skills that increase their success at school and (2) establishing **school-based***

***mentoring programs or relationships with community-based mentoring organizations that focus on academic achievement.***

- *Recommendation: Engage student voice in all aspects of the design of this program.*
  
- **E-23: May a 21<sup>st</sup> CCLC subgrantee prohibit a student with a disability from participating in a 21<sup>st</sup> CCLC program?**
  - *Recommendation: Provide examples of best practice, technical assistance opportunities, and stories to help states and programs be better prepared to meet this important aspect of programming.*
  
- **F-2: What are the local evaluation requirements?**
  - *Recommendation: To meet this important requirement, provide additional information on how programs can implement continuous improvement processes and the appropriate infrastructure to evaluate their work, including grantee set asides.*

Thank you again for the opportunity to provide feedback on this important matter. Feel free to reach out to [aevans@mentoring.org](mailto:aevans@mentoring.org) if you have any questions.