



MENTOR

February 28, 2022

Nicole White
U.S. Department of Education
400 Maryland Avenue SW, Room 3E326
Washington, DC 20202

Submitted via Regulations.gov
Re: [Docket ID ED–2021–OESE–0122]

Dear Ms. White:

Please accept the following comments to the Office of Elementary and Secondary Education in the Department of Education for docket ID ED-2021-OESE-0122, Proposed Priorities, Requirements, and Definition – Project Prevent Grant Program, on behalf of MENTOR. MENTOR is a national nonprofit with a mission of expanding and enhancing mentoring relationships for young people across the country. Research has proven it to be a unique, innovative strategy to address multiple protective factors at once and improve student education and workforce experiences. Mentoring has long been a staple of juvenile justice and violence prevention efforts, and can provide critical relational supports to young people who have been exposed to community violence.

Our comments below are organized by section in the federal register notice.

Program Priorities

Proposed Priority 1: Addressing the Impacts of Community Violence

We support this proposed priority as an *absolute priority*. Effective approaches to address youth and community violence encompasses strategies that are partnered among multiple institutions (i.e. local/county government agencies, nonprofits, private sector) to create systems of collective impact, in order to provide for other community needs, such as jobs, housing, and food. Further, youth who have been impacted by trauma must have comprehensive wraparound services, including mental health services.

Proposed Priority 2: Established Partnership with a Local Community-Based Organization

We support this proposed priority as an *absolute priority*. For community violence intervention work to be effective, there must be a strong initial, idiosyncratic, hyper-local mapping and research of the community, with the purpose of empowering the community to design interventions that will work for itself. This includes the community identifying the assets it already has, the programs that already exist, and solidifying partnerships between each of the key institutions, including schools, community-based organizations, and employers, when appropriate. We appreciate that this priority specifically calls for providing a memorandum of understanding between partners in the project, as it rewards already- or nearly-established assets and partnerships.

Proposed Priority 3: Supporting Children and Youth from Low-Income Backgrounds

While we support the concept of ensuring high-poverty schools, where students are more likely to be

exposed to community violence, be prioritized in these grants, the proposed priority language is unclear. Sections A-E repeat the same description with a different percentage of families below the poverty line. The department should select one of these percentages (likely at the higher end) and make this priority a *competitive preference priority*.

Program Requirements

Proposed application requirement, part (d), Evidence-based, culturally competent, and developmentally appropriate programs and practices, part 1.

We strongly support this application requirement. This question fits well within the necessary framing of differentiated, targeted support and programming for those most affected, with tiered approaches.

We strongly support ‘mentorship programming’ listed within subpart iii for interventions and services that target individual students who are at a higher risk. Mentoring has been proven to be one of the few prevention and intervention strategies that can effectively address multiple risk and protective factors simultaneously,¹ and has been rated as “effective” in reducing delinquency outcomes by the National Institute of Justice’s CrimeSolutions clearinghouse. It makes sense that relational supports, such as a mentoring, would be offered to youth in an integrated, multi-pronged partnership to address community violence.

Proposed application requirement, part (e), Framework for planning, implementation, and sustainability, part 3.

We support this application requirement. It is critical that grantees complete initial, hyper local mapping, research, and outreach so the community can design interventions that will work for itself. Through the needs assessment, resource mapping, and program selection processes that are required, applicants must identify the community’s problems, challenges, assets, and programs that already exist to help mitigate the problem. We suggest, however, that an additional question is added to reflect and compel community convening and collaboration. Without strong partnerships, a diverse array of partners, and community buy-in, these projects may have weaker outcomes.

To further support the effective implementation, success and sustainability of these efforts, we recommend the Department encourage grantees to utilize a federal resource that will support them in imbedding quality, evidence-based mentoring and mentoring-like practices into their programming via the [National Mentoring Resource Center](#) (NMRC). The NMRC is housed within the U.S. Department of Justice’s Office of Juvenile Justice and Delinquency Prevention and makes training and technical assistance available – at no cost – to any requesting organization or entity. The Department can list the NMRC as an effective and recommended resource available to schools and their community-based partners to support these efforts.

Proposed application requirement, part (f), Planning period.

We strongly support a 12-month planning period for funded projects. If funded projects have not already done so prior to applying for a grant, it is absolutely critical that they complete the community

¹ DuBois, D. L., Portillo, N., Rhodes, J. E., Silverthorn, N., & Valentine, J. C. (2011). How effective are mentoring programs for youth? A systematic assessment of the evidence. *Psychological Science in the Public Interest*, 12(2), 57–91.

mapping, outreach, and research that is required to achieve community buy-in and effectively support youth.

Definition of Community Violence

This definition could be strengthened by adding that community violence are intentional acts and often committed in public/outside areas.

Overall, we are thankful for the Department's efforts to frame this grant program to address one of the most important issues our young people are facing and especially encouraged by the focus on community-based partnerships and relational supports in addition to adding and strengthening school-based mental health supports.

Sincerely,
MENTOR National