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February 21, 2024

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Comments from The Wallace Foundation on *Proposed Priorities, Requirements, Definitions, and Selection Criteria-Comprehensive Centers Program*

Dear Secretary Cardona:

I am writing on behalf of The Wallace Foundation in response to the invitation to submit comments on the Notice of a Proposed Rulemaking published in the Federal Register on January 23, 2024, titled *Proposed Priorities, Requirements, Definitions, and Selection Criteria-Comprehensive Centers Program*.

The Wallace Foundation is a non-partisan, independent, and endowed charitable foundation. Through our work, we seek to develop and share research evidence that can inform practice and policy in three areas: K-12 education leadership, afterschool and summer learning, and the non-profit arts sector. Since 2000, one of our main goals has been to provide reliable, credible evidence on the role of leadership in school improvement and ways to improve principals' performance and its impact on teacher and student outcomes. We adhere to the principle that "we say more, only as we know more," limiting any recommendations we make to what the evidence supports.

Based on the evidence, we are writing to recommend that if the final rule includes a Center on Strengthening and Supporting the Educator Workforce then you should more clearly and fully define the focus on "educators" to include "principals and other school leaders." We also suggest that you include educators involved in out-of-school time programs, such as 21st Century Learning Communities.

First, in defining the scope of the Center on Strengthening and Supporting the Educator Workforce, the Department should clearly include and use the words "teachers, principals, and other school leaders" in place of the word "educator." This language is consistent with the Elementary and Secondary Education Act and subsequent Department regulations and guidance, as well as findings from the Department's Regional Advisory Committees. There is strong evidence that principals and other school leaders play important roles in student success, school climate, and school outcomes. For example, a 2017 review of research found, "school leadership can be a powerful driver of improved education outcomes" and that "activities designed to improve school leadership demonstrate positive impact on student, teacher, and principal outcomes, based on research that is consistent with ESSA evidence tiers."¹ Research on an initiative funded by Wallace demonstrated that when six large districts developed comprehensive and

¹ [School Leadership Interventions Under the Every Student Succeeds Act: Evidence Review: Updated and Expanded](#), Rebecca Herman, et al., RAND, 2017.

aligned processes to develop and support principals, students benefited. After three years, pipeline-district schools with newly placed principals outperformed comparison schools in other districts by more than 6 percentile points in reading and almost 3 percentile points in math, based on a comparison of 1,100 pipeline schools with more than 6,000 comparison schools, with comparisons made within the same states; researchers noted that “we found no other comprehensive district-wide initiatives with demonstrated positive effects of this magnitude on achievement.”²

Second, we recommend that the Center – in aiming to provide all students with highly qualified educators across the P–12 continuum and to support ongoing professional learning – expressly include teachers, principals, and other school leaders who are working in school-based summer and afterschool programs. Research led by the RAND Corporation published in 2019 found that high quality out of school time programs, including on-grade level school teachers providing academic supports, improved student outcomes.³ A National Academies of Science and Medicine report from 2019 found that summer programming can be a key strategy for addressing disparities and inequities for young people.⁴

We hope that these evidence-based recommendations are helpful. Please let us know if you have any questions or would like any additional information on these issues.

Sincerely,



Will Miller
President, The Wallace Foundation

² [*Principal Pipelines: A Feasible, Affordable, and Effective Way for Districts to Improve Schools*](#), Susan M. Gates, et al., RAND, 2019.

³ [*Investing in Successful Summer Programs: A Review of Evidence Under the Every Student Succeeds Act*](#), Jennifer Sloan McCombs, et al., RAND, 2019.

⁴ [*Shaping Summertime Experiences: Opportunities to Promote Healthy Development and Well-Being for Children and Youth*](#), Martín-José Sepúlveda and Rebekah Hutton, National Academies of Sciences, Engineering, and Medicine, 2019.