



Harvard Family Research Project

Heather B. Weiss, Director

November 9, 2009

The Honorable Arne Duncan
Secretary
U. S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Docket ID: ED-200-OII-0012

RE: Investing in Innovation: Comments from the Harvard Family Research Project

Dear Secretary Duncan,

We at the Harvard Family Research Project appreciate this opportunity to submit comments on the U.S. Department of Education's Federal Register Notice regarding the Investing in Innovation Fund's proposed priorities, requirements, definitions, and selection criteria. As a members of the National Working Group on Family, School and Community Engagement we endorse the Working Group's comments that were submitted on November 6, 2009.

Since 1983 the Harvard Family Research Project (HFRP), housed at the Harvard Graduate School of Education, has helped stakeholders develop and evaluate strategies to promote the well-being of children, youth, families, and their communities. We work primarily within three areas that support children's learning and development: early childhood education, out-of-school time programming, and family and community support in education. Underpinning all of our work is a commitment to evaluation for strategic decision-making, learning, and accountability.

Given the solid research base that correlates family engagement with positive student outcomes, we strongly recommend funding promising family, school and community engagement innovations as part of validation and development grants. We acknowledge that there have not been sufficient public or private investments in high-quality evaluations of family, school, and community engagement programs and initiatives and, as a result, the field is not well positioned for scale-up grants; however, it is ready for validation and development grants.

We also recommend, should validation and development grants include a family engagement component as part of a comprehensive intervention, that appropriate designs isolate the added value of the family component. HFRP's review of family-strengthening interventions designed to address children's behavioral and academic outcomes—interventions evaluated with experimental or quasi-experimental designs—showed that few of the interventions specifically isolated the impact of the parenting component relative to the total intervention. The interventions, which were directed at parents and children, had positive impacts on parenting and family engagement as well

as on students' academic and behavioral outcomes. (See Lessons from Family Strengthening Interventions: Learning from Evidence-Based Practice, <http://www.hfrp.org/publications-resources/browse-our-publications/lessons-from-family-strengthening-interventions-learning-from-evidence-based-practice>).

We wish to express our concern here that easily controlled, short-term programs—rather than more long-term, systemic approaches—will be elevated through the innovations funds Tier One scale-up grants, thereby limiting understanding and development of more systemic, sustained family involvement. There is a danger that the scale-up grants, designated to receive the bulk of innovation funds, may go to programs that are narrowly focused and that easily lend themselves to randomized control trials, whereas the four priority areas embody complex issues and require complex, systemic solutions. We define systemic solutions as those that embody individual, organizational, and policy changes at several levels of an implementation chain. For example, in a review of workforce development and child outcomes in the human services sector (early childhood, social work, after-school and juvenile justice workers), HFRP created a logic model to conceptualize the linkages and pathways in workforce development (training/professional development, organizational capacity and policy supports) and child outcomes. The research from which the model was developed revealed that professional development was the most common strategy, but that it was not sufficient to guarantee program quality and staff retention. Many complex factors—ranging from compensation to supervisory structures and organizational culture—affected whether the skills imparted through professional development could make a sustainable difference in practice (see *The Evaluation Exchange*, Vol. 11(4) 2005/2006).

Regarding the proposed selection criteria, we have two comments in relation to effect size. First, in considering the merit of proposals, we urge the Department to consider effect size in the context of the evaluation question being posed. It is not enough to ask what works; the conditions under which the program works best must also be examined. Through this approach, specific program characteristics are related to effect sizes, thereby providing insight into what works for whom under what types of conditions. Second, there is no agreement among evaluators from various disciplines about the interpretation of effect size. Any interpretation must occur in an intervention's wider context. Physicians, for example, prescribe aspirin to adult patients even if the effect size of aspirin in reducing heart attacks is .03; their advice is based on the small cost and potentially large benefit of the intervention (see McCartney and Dearing, *Evaluating Effect Size in the Policy Arena*, *The Evaluation Exchange*, Vol. 8(1) 2002).

We appreciate the opportunity provided by the Secretary and the Department to provide feedback on its key reforms. Please feel free to contact me at (617) 495-9108 or weisshe@gse.harvard.edu if further clarification on this comment is needed.

Yours sincerely,



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