



April 5, 2011

The Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202

RE: Promise Neighborhoods – Comments on FY 2011 Proposed Priority

CFDA Number: 84.215P

Dear Secretary Duncan:

On behalf of the Coalition of Urban Serving Universities (USU), we are pleased to submit comments for the Promise Neighborhoods proposed priorities, requirements, definitions, and selection criteria as published in the March 10, 2011 Federal Register. USU was pleased that institutions of higher education were eligible to apply for Promise Neighborhoods planning grants in 2010. We look forward to working with you as you work to finalize the final priorities, requirements, definitions, and selection criteria for the Promise Neighborhoods Program.

USU is a network of 46 public urban research universities that represents every region of our country. University presidents created USU to improve urban life and America's competitiveness in the global economy. Our institutions are deeply committed to improving student academic performance and reducing achievement gaps.

USU members are leaders in their schools and districts and have developed cradle to career partnerships representing K-12 education, higher education, business, non-profit, philanthropic, civic, and faith sectors. USU and Living Cities, Inc. formed a national partnership to replicate a model cradle to career partnership created by the University of Cincinnati and others in Cincinnati/Northern Kentucky. This place-based neighborhood-focused model is currently being implemented by our member institutions in Oakland, CA, Indianapolis, IN, Houston, TX and Richmond VA. The national partnership is also supporting planning sites in additional cities: Phoenix, AZ, Fresno, CA, Portland, OR, Memphis, TN, and Albuquerque, NM, and State University of New York.

Urban universities also serve as anchors in their communities, leading efforts to assess, document, discuss, and solve many neighborhood and community problems. Their missions of research, teaching, and service also enable USUs to implement place-based policies like Promise Neighborhoods. In fact, California State East Bay, a member of USU, was selected as a grantee for a first-year Promise Neighborhood Planning Grant because of its vision to include education as an integral part of its surrounding community.

The federal government has a history of partnering with urban universities to meet the needs of their metropolitan areas and USU believes the Promise Neighborhoods Program can ensure community needs are being met by incorporating a greater emphasis on the role of urban university partners.

Therefore, USU recommends:

- Strengthening the role of universities in the development of Promise Neighborhood applications
- Reinforcing the importance of research, data-driven methods and rigorous evaluation of effective strategies.
- Establishing key research-based, data indicators of improvement and the regular collection, analysis, and reporting of these data.
- Ensuring applications for implementation grants are available to all applicants, not just to awardees of the first round of planning grants.

Specific language suggestions provided below with new language provided in italics.

Recommended language for “Purpose of the Program”

(5) Learning about the overall impact of the Promise Neighborhoods program and about the relationships between particular strategies in Promise Neighborhoods and student outcomes, including through a rigorous *research on successful practices* and evaluation of the program

Recommended language for “Background” for planning grants

Include after “(5) participate in a community of practice (as defined by this notice)”:

(6) Engage institutions of higher education in research and recommendations for best practices.

Recommended language for “Background” for implementation grants

Include after “(5) participate in a community of practice”:

(6) Engage institutions of higher education in

(a) Research on effective identification, collection and regular reporting of key performance indicators of improvement;

(b) Strategies and evaluation of program outcomes; and

(c) Partnerships with Promise Neighborhood grant recipients to create data frameworks of common, research-based performance indicators that are adopted and reported on by all partners

Recommended language for “Proposed Planning Grant Priorities”

Include in the requirements for an applicant’s proposal:

(6) A description of procedures and identified university partners for research on identification, collection, and regular reporting of key performance indicators of improvement and procedures for evaluation of implementation of selected program strategies.

Recommended language for “Proposed Implementation Grant Priorities”

Include in the requirements for an applicant’s proposal:

(6) A description of procedures and identified university partners for research on identification, collection, and regular reporting of key performance indicators of improvement and procedures for evaluation of implementation of selected program strategies

These comments are submitted on behalf of the Coalition of Urban Serving Universities.

For further information, please contact Shari Garmise, Vice President, the USU/A·P·L·U Office of Urban Initiatives (202-478-6064).