



May 1, 2013

Commissioner Gladys Carrión, Esq.,
NYS Office of Children and Family Services
52 Washington Street
Rensselaer, NY 12144

Dear Commissioner Carrión,

Thank you for the opportunity to comment on the Child Care and Development Fund (CCDF) Plan for New York State for Federal FY2014-15 (the Plan). The New York State Afterschool Network (NYSAN) has been pleased to have the Office of Children and Family Services (OCFS) as a strong partner as we work to promote the safety, learning, and healthy development of children and youth outside the traditional classroom. This joint comment additionally introduces the New York State Cradle to Career Alliance (Alliance), recently launched by the State University of New York, which assists and supports cradle to career (C2C) initiatives throughout the state that bring together a broad spectrum of local stakeholders from both within-school and out-of-school settings for collaborative action and collective impact on student outcomes. This support could come in the form of providing technical assistance around building civic infrastructure and utilizing the Strive Theory of Action, a C2C community of practice, policy advocacy, and fundraising. NYSAN and the Alliance view OCFS as an ally in their work for improved outcomes and experiences for the children and families of New York State. We look forward to a relationship of continued and mutual support.

NYSAN and the Alliance wish to address an issue that was not included in the Plan but is crucial for building civic infrastructure, aligning New York State's out-of-school-time system with other initiatives at the federal, state, and local level, and supporting programmatic best practices across the state. New York State needs a comprehensive data system that tracks student-level data from participation in afterschool, summer, and other out-of-school programs (whether or not they are registered as school age child care programs).

Such a data system will allow community initiatives, such as those assisted by the Alliance and supported by federal grants (e.g. Promise Neighborhoods or C2C partnerships), to use that information to comprehensively approach meeting students' needs and to include information on the out-of-school-time systems in their data-driven planning process for systemic change. At the state level, such a data system would allow the first comprehensive picture of currently available services, leading in turn to a better understanding of need, the capacity to assess distribution of resources, and the ability to conduct high-quality longitudinal studies on the outcomes of participation in out-of-school-time programs. Having such a system would allow data about students' participation in out-of-school programs to be included in the P-20 data system that the State Education Department is building, enabling substantial, sophisticated research about the contributions of expanded learning opportunities to students' college and career readiness.

New York State's out-of-school-time system and C2C partnerships are generally funded through a patchwork of federal, state, local, and private funds, each with their own reporting

requirements and several with some type of data system, although none that are comprehensive. Many programs have had to choose to invest their scarce resources in their own student-level data system for both administrative and quality purposes because no state framework exists. Without a comprehensive, state-level data system, these disjointed and discontinuous attempts to collect student and program data only allow the state to have an isolated, fragmented picture of New York's out-of-school-time system and can hamper local collaborative action and collective impact efforts as youth services cannot be fully incorporated into data-based planning efforts.

The bottom line is that New York does not have an accurate count of how many of its students attend some form of afterschool, summer, or other out-of-school programming and therefore cannot accurately assess the extent of unmet student needs. It also cannot assess the long-term impacts of these programs on students' college and career readiness, although evidence from other states and individual program evaluations suggest the impact is positive and significant.

As the state considers possible models and solutions for such a data system, Strive's Student Success Dashboard (SSD) features specific characteristic and functionality that will allow its users to keep community partners, school leaders, and funders informed as they work toward systemic change. This model suggests that key components of a New York State system might be:

- A web-based tool that is not dependent on specific and expensive hardware requirements;
- A customizable environment that accommodates multiple categories of data and sources in anticipation of unique community resources;
- Simple and flexible analytics with the ability to illustrate overall impact of out-of-school services and programs on student learning in the classroom; and
- Centralized implementation around school district data.

National research on afterschool data systems and the experiences of NYSAN's partners across the state with a variety of databases point toward additional features that would be essential to the success of an out-of-school-time data system for New York State. These include:

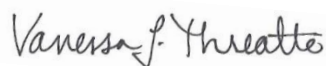
- Functionality to share data with other databases easily, and automatically whenever possible;
- Agreement on definitions of certain key data fields to allow valid aggregation; and
- Inclusion of outcome measures that reflect the full range of youths' developmental needs.

OCFS should add the development or acquisition of a comprehensive student data system that includes out-of-school-time programs and services to its Health and Safety and Quality Improvement Activities goals under the Plan. Doing so would have a meaningful impact on the ability of the state and its communities to serve and improve outcomes for students and effectively leverage the time students spend out of school—about 80 percent of their day.

Sincerely,



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