

**Comments on the Secretary of Education's Priorities for Discretionary Grant
Programs Docket ID ED-05-2010-0011
RIN 1894-AA00**

Community Anti-Drug Coalitions of America (CADCA), which represents more than 5,000 community coalitions nationwide, appreciates the opportunity to provide comments on the Secretary of Education's Priorities for Discretionary Grant Programs (Docket ID ED-05-2010-0011; RIN 1894-AA00).

CADCA commends the Department of Education (the Department) for its efforts to "focus Federal financial assistance on expanding the number of programs and projects Department-wide that support activities in areas of greatest educational need." CADCA is concerned, however, that without an explicit focus on drug prevention (defined as the prevention of underage drinking, illegal drug use and/or the misuse/abuse of over-the-counter and prescription medications and products), the Department may not in fact achieve its goal.

Below are specific recommendations for the explicit inclusion of drug prevention in relevant priorities outlined in the Federal Register.

Proposed Priority 2

Proposed Priority 2 is aimed at projects that are "designed to support the implementation of internationally benchmarked, college- and career-ready academic standards held in common by multiple States, including projects in one or more of the following priority areas: (a) The development or implementation of assessments aligned with those standards; (b) The development or implementation of instructional materials aligned with those standards; (c) The development or implementation of professional development or preparation programs aligned with those standards; and (d) Strategies that translate the standards into classroom practice."

CADCA recommends that the following underlined language is added to letters (b) and (c):

(b) The development or implementation of instructional materials, **including those that teach youth about workplace pre-employment standards such as drug testing**, aligned with those standards

(c) The development or implementation of professional development or preparation programs, **including those that will educate teachers about workplace pre-employment standards such as drug testing**, aligned with those standards

Rationale

Drug use is a critical determinant of the academic success or failure of our youth, as well as their future employability. Youth with an average grade of D or below were more than

four times as likely to have used marijuana in the past year as youth with an average grade of A, and those who use alcohol may remember 10% less of what they have learned than those who don't drink. Additionally, when compared to their non-using peers, high school students who use alcohol or other drugs are up to five times more likely to drop out of school.

Drug use and serious disciplinary action in schools also are closely linked. In fact, 31% of serious disciplinary actions in the schools can be attributed to the distribution, possession or use of illegal drugs and alcohol. Disciplinary actions taken for these offenses rival those taken for physical fights, which is 32%, and is the most common offense for which action is taken against a student. Therefore, if the underlying issue of drug use is not addressed in schools, it will be nearly impossible to achieve a positive school climate, much less to increase the academic performance of our youth.

Substance use and employability also are very closely, but inversely linked. Without effective school based drug prevention/intervention programming, the goal of having U.S. high school graduates career ready may not be achievable. According to the 2009 *Monitoring the Future (MTF) Survey*, 5.2% of high school seniors use marijuana on a daily basis; and 20.6% of high school seniors used marijuana in the past 30 days. This means that if one of these students attempts to obtain a job from one of the more than 6,000 companies, and scores of industries nationwide that require a pre-employment drug test, they could fail and not be hired.

All high school aged students need to understand that 1) drug use can negatively impact their academic achievement, and therefore hamper their ability to go to college; and 2) workplace pre-employment and random drug testing are common and widely used. Therefore, drug use can result in a positive test, which in turn, can result in losing job opportunities in many employment sectors and national companies that currently require drug testing.

This is particularly important in light of the fact that drug use is on the rise. *Pride Surveys 2009 National Summary of Adolescent Alcohol and Drug Use* shows small, but significant increases in 30-day prevalence for all drug categories in all grades 6 through 12. Additionally, according to the *2009 National Youth Risk Behavior Surveillance Survey*, past 30 day use of marijuana among high school students increased at a rate of 5.6%, from 19.7% to 20.8% percent between 2007 and 2009.

At the same time, attitudes about the dangers of drugs are softening. For example, according to the most recent *MTF Survey*, among 8th graders, fewer students believe that smoking marijuana occasionally and regularly is dangerous; among 10th graders, fewer students believe that smoking marijuana occasionally and regularly; trying ecstasy once, twice or occasionally; having five or more drinks one to two times in a weekend; and using smokeless tobacco regularly is dangerous; and among 12th graders, fewer students believe trying ecstasy once or twice is dangerous.

Given that substance use and being college- and career-ready are closely related, it is imperative that the development or implementation of instructional materials, professional development programs or preparation programs with an explicit focus on workplace pre-employment standards, including random drug testing, be a key component of Proposed Priority 2. High school students entering the workforce must be educated about how drug use can impact their ability to become college- and career-ready; why they could be subject to drug testing in the workforce; what they could be tested for; how the results could be used then and in the future; and how to identify good employers as places to work by looking for the policies, practices, and resources to specifically help young adult workers.

Proposed Priority 10

Proposed Priority 10 is aimed at projects that are “designed to collect (or obtain), analyze, and use high-quality and timely data, especially on program participant outcomes, in accordance with privacy requirements in one of the following priority areas: (a) Improving instructional practices, policies, and student outcomes in early learning settings; (b) Improving instructional practices, policies and student outcomes in elementary and secondary schools; (c) Improving postsecondary student outcomes relating to enrollment, persistence, and completion and leading to career success; and (d) Providing reliable and comprehensive information on the implementation of Department of Education programs, and participant outcomes in these programs, especially by developing strategies with appropriate State agencies to use data from State longitudinal data systems or by obtaining data from reliable third-party sources.”

CADCA recommends that the following underlined language is added to letter (d):

“(d) Providing reliable and comprehensive information on the implementation of Department of Education programs, and participant outcomes in these programs, especially by developing strategies with appropriate State agencies to use data from State longitudinal data systems, **to include the core data set of incidence, prevalence, age of onset, perception of harm, and perception of social disapproval of drug use**, or by obtaining data from reliable third-party sources.”

Note: for the purpose of this priority, drug use is defined as the use of alcohol, tobacco, illegal drugs and/or the misuse/abuse of over-the-counter and prescription medications and products.

Rationale

With the recent elimination of the State Grants portion of the Safe and Drug Free Schools and Communities program, the collection of local school survey data has become an unfunded mandate and many schools can no longer afford to pay for/and or administer these surveys. This is highly problematical as drug use plays a major role in the overall school climate, as well as the academic success, and the college- and career- readiness of youth. It is therefore critical that the Department continue to place an *explicit* emphasis

on collecting the core data set of incidence, prevalence, age of onset, perception of harm, and perception of social disapproval of drug use (as defined above) by including it in Priority 10.

Collecting this core data set is necessary to ensure that schools/communities have reliable and valid local data that allows them to:

- understand their local issues and needs to be able to recognize and respond to them;
- pick appropriate programs, strategies, and policies to meet locally identified issues and needs;
- evaluate programs and progress over time;
- apply for new grants that require data and baseline statistics for comparison and to show progress over time; and
- compare data within and across states.

This data must be collected in such a way that it can be reported by local educational agencies (LEAs)/communities to states and from the states to the Secretary of Education and other federal agencies in a manner that is useable to show that progress has been made over time on addressing the core measures.

The intention is ensure that what LEAs/communities are implementing as far as programs and strategies can be tied back to their local data so that progress and outcomes can be tracked over time and attributed to what has been implemented.

Again, CADCA commends the Department of Education for its laudable goal to ensure that the United States will lead the world in the proportion of citizens with college degrees or other post secondary credentials by the year 2020. CADCA strongly believes, however, that this cannot be achieved if drug use is not specifically and explicitly addressed in the Secretary's priorities. Therefore, CADCA respectfully urges the Secretary to consider incorporating the above listed language into Priorities 2 and 10.

Thank you in advance for your consideration of these comments.