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August 28, 2009

Office of Elementary and Secondary Education
Attention: Race to the Top Fund Comments
U.S. Department of Education
400 Maryland Avenue, SW
Room 3W329
Washington, DC 20202

[Docket ID ED-2009-OESE-0006]

Dear Secretary Duncan:

ASCD, representing more than 175,000 educators, appreciates the opportunity to comment on the notice of proposed priorities, requirements, definitions, and selection criteria (NPP) for the Race to the Top Fund (RTF). We are encouraged by the Department's efforts to provide states with incentives to think innovatively about the best ways to improve teaching and learning in our nation's schools and doing so by means of competitive grants.

Nevertheless, we have several important questions and concerns that we hope can be addressed in the final application. Notably, ASCD asks that

- the school-level conditions for reform and innovation (Proposed Priority 5) be elevated from an invitational priority to a competitive preference priority;
- the Department rethink its proposal to make adoption of the Common Core Standards a requirement for Race to the Top funds;
- the Department maintain provisions aimed at fostering cooperation between states and LEAs to encourage the use of data in school- and district-based decision making, but consider access and alignment of data systems beyond student performance indicators;
- states be required to ensure that the services they provide for children are coordinated and delivered in a way that supports the whole child;
- states be required to provide an annual state report card on the health, safety, and education of children and families;
- states be required to put in place policies aimed at improving teacher preparation programs, licensure or educator qualifications, and high-quality professional development activities, as opposed to elevating the status of alternative certification programs, and that these requirements be made a component of the state reform criteria; and
- states be required to disclose information regarding the number of charter school closures as evidence of the charter authorizers' and the state's commitment to the establishment of high-quality charter schools.

More detail on our specific comments are below. If there are any additional questions or comments, please contact me at 1-703-575-5621 or dgriffith@ascd.org.

Cordially,

A handwritten signature in black ink, appearing to read "David Griffith". The signature is written in a cursive, slightly stylized font.

David A. Griffith
Director of Public Policy

Proposed Priorities

ASCD is pleased to see the school-level conditions for reform and innovation are included as a proposed priority (Proposed Priority 5), but believe these criteria are so fundamental to effective and sustained education improvements that they should be given greater consideration in the selection process. Many of the ideas included in this section are ones advocated by ASCD members. We have been long-time proponents of reforms such as expanded learning time, rethinking the use of the Carnegie Unit (which promotes students based on instructional time rather than student performance outcomes), and providing comprehensive services (though we would prefer this reference be changed to “comprehensive learning supports”) to students through vehicles found both inside the school as well as within the larger community.

Indeed, the forward-thinking and highly visible Race to the Top initiative is the ideal vehicle for the Department to foster a new way of approaching education policy and practice—a whole-child approach to learning, teaching, and community engagement—in the states. The final grant criteria can play an important role to spur innovation in redefining time structures, coursework, instructional materials, teacher effectiveness, and assessments. We strongly encourage the Department to include the following criteria in the reform plan requirements:

- Collaborations among school and health and social service agencies to provide comprehensive services
- Effective health, nutrition, and school readiness programs
- Comprehensive school-based plans for fostering healthy school communities

The prospect that these types of reforms, which have shown great promise in many schools across the country, are relegated to the status of invitational priority—one in which the Department has an interest, but will give no preference to applications that include evidence of districts that have given schools the ability to implement such innovations—is disappointing. We believe all schools should be looking to reforms such as these to better serve their students. Given this, we would like to see this priority elevated to a competitive preference priority, allowing states to earn additional points for it in their applications. We believe this will encourage more states and LEAs to look at reforms such as these as feasible and attractive ways to bring about sound reform to their schools.

Proposed Selection Criteria—Standards and Assessments

Committing to the adoption of a common set of K–12 standards that are internationally benchmarked and college- and career-ready is one of the state reform conditions criteria being proposed in order for states to apply for Race to the Top funds. ASCD supports high standards for our students, educators and schools. A rigorous curriculum and high standards are the means by which our children will receive a world-class education that can place them on par with their peers abroad. While we appreciate the eloquence with which Secretary Duncan has made the case for both higher and more uniform academic state standards, we believe it is both premature and inappropriate for the Department of Education to require states to adopt a set of “common core” (i.e., “national”) standards as a condition to be eligible to apply for and receive this federal grant.

Rather than requiring the adoption of common core standards, the Secretary should give those states he believes already have high standards and rigorous proficiency levels additional credit in

the grant-award process. Along those same lines, given the Secretary's conviction in the importance of standards, his strong statement that "far too many states ... are fundamentally lying to children," and the NPP's emphasis on existing reform conditions, the selection criteria should discount applications from states the Secretary believes have lied or "gamed" the accountability and assessment systems or whose recent reading and math assessment scores are dramatically inconsistent with their National Assessment of Educational Progress (NAEP) results.

We are also very concerned about the timing of the Race to the Top requirements relative to the development of a common core of standards. The only such project we are familiar with is the Common Core Standards Initiative (CCSI), a joint effort of the National Governors' Association (NGA) and the Council of Chief State School Officers (CCSSO). To our knowledge and based on the statements and documents from the Initiative, the K-12 standards in reading and math have not yet been developed and will only begin being drafted in mid-September. It is difficult to recall the U.S. Department of Education, much less any federal agency, making a grant award contingent on state adoption of a policy or program that has yet to be created.

More broadly, we are concerned that the proposed requirement that states adopt the common core standards will preempt what, up to now, has been a state-led process and call into question the voluntary nature of state adoption of the standards that has allowed the CCSI to gain widespread support. This Department mandate on state standards, albeit limited to states receiving Race to the Top funds, does not bode well for a potentially more sweeping directive in the pending reauthorization of the Elementary and Secondary Education Act (ESEA).

Data Systems to Support Instruction

ASCD believes that data should be used to influence instructional decision making in the classroom and in the school building to drive curriculum decisions and planning aimed at improving teaching and learning. Research has shown the positive impact data can have on teachers as they decide how to deliver content and instruction in the way that serves their students best. Data also assists principals and education leaders in their curriculum planning and development. We appreciate that the Department included provisions aimed at fostering cooperation between states and LEAs to encourage the use of data in school- and district-based decision making.

We encourage the Department to consider access and alignment of data systems beyond student performance indicators. Truly innovative and useful data reform would require state and local governments to dismantle the obstacles to real collaboration between and among school systems and the social, health, and safety services that support children.

Race to the Top state reform conditions should require that states ensure that the services they provide for children are coordinated and delivered in a way that supports the whole child, and a critical first step is to make sure that state data systems allow appropriate decision makers to see both a comprehensive view of how children are being served throughout the state and an individual view of young people without going from agency to agency to find the information.

Coordinating data among state agencies is challenging because of the need to protect confidential information, incompatibility among data systems, and bureaucratic turf battles. But such

coordination is essential if states are to succeed at making sure all children are healthy, safe, academically and civically engaged, supported, and challenged.

Moreover, it is imperative that states provide to the public useful information and data derived from these systems. Reading and math scores are easy to obtain; measures of engagement, accomplishment and appreciation of the arts, or civic engagement require a different kind of assessment. This information is not as easily accessible and is often considered unavailable.

We recommend that reform plan criteria include annual state assessments of the health, safety, and education of children and families. An annual Whole Child State Report Card would be an important tool—a comprehensive look at the circumstances (e.g., hunger, poverty, crime, literacy, and health) of children in the state—to inform the public and policymakers about factors that influence student success. Adding this requirement would result in clear and concise reports available to the public, a better informed citizenry, and an improved policy environment. Policymakers would be able to easily identify the progress and areas in need of improvement to ensure that all of their children receive the education and supports they need for a productive future.

Great Teachers and Leaders

Research has shown time and again that the two most important school-based factors affecting student learning are the quality and effectiveness of their classroom teachers and school principal. Therefore, it is imperative that states and districts give significant thought and attention to ways in which they can recruit and retain the most qualified and effective educators as well as support the overall education profession using proven methods that bolster the quality of those who work in our nation's schools.

Therefore, it is disappointing that the Race to the Top proposal elevates alternative certification programs above all other teacher preparation strategies. ASCD supports policies and practices that hold educators responsible for providing a quality education to all students and for continuously improving the education profession and all public schools. To foster student learning, educators need a knowledge base of content matter; instructional and management strategies drawn from research on learning processes, brain functioning, child and adolescent development, and other related studies; and instructional intervention approaches that accommodate students' individual learning styles and capabilities. This type of knowledge cannot be garnered in a matter of a few weeks in a preservice training.

It is our strong belief that any program used to prepare teachers and principals for classroom service should be thorough and rigorous. Instead of only requiring states to make provisions allowing for alternative certification for teachers and principals, we believe the states and our children will be better served by also requiring states to put in place policies aimed at improving teacher preparation programs, licensure or educator qualifications, and high-quality professional development activities and have these requirements be a component of the state reform criteria.

In addition, we believe all credentialing programs should be held to the same standards and assessment of their quality and that if public reporting is to be done on the effectiveness of any

given program, all programs should be subjected to this requirement. Exempting programs that graduate fewer than 20 people per year from these proposed reporting requirements is a loophole that leads to an uneven accountability system. High standards should be expected of all educators, no matter the size of their graduating cohort.

Further, the definition for alternative certification routes provided in this NPP delineates that said programs should “provide a clinical/student teaching experience.” We believe that some guidance on the scope, quantity, and quality of this clinical experience is warranted given the wide variance in the amount of time required by traditional programs and alternative routes for this preservice work. One pathway or program leading toward licensure should not be favored over others. Instead, the states’ and the Department’s goal should be to ensure that the most qualified best trained individuals are allowed to become the educators that enter our nation’s classrooms.

Notwithstanding this focus within state reform conditions that apply exclusively to incoming teachers, we appreciate the inclusion of professional development as part of any evaluation system. We strongly caution the Department to be especially vigilant in reviewing and approving state plans for evaluating, reporting on, and compensating educators based on their “effectiveness” as measured, in part, by student growth data. ASCD supports not only a definition of educator effectiveness that includes, but is not limited to, indicators related to student growth and proficiency, but also differentiated recognition programs, including locally determined incentive and merit pay programs tied to educator effectiveness. But given the controversial nature of these concepts and the varying degrees to which states have developed these sophisticated systems (some states that are expected to apply for Race to the Top funding are still working to remove statutory impediments to linking student data to teacher assignments and have not yet established a robust evaluation model), it is imperative that the Department move prudently in this area lest problems that emerge and are associated with the Race to the Top initiative stunt the expansion of these programs in the future.

In addition, while we also appreciate the call for “providing effective support to teachers and principals” (section (C)(5)), we believe this section should be reworded so that that the emphasis is clearly on these vital supports and not on the rapid-time data that is to be used to inform it. We propose that this section read:

(C)(5) Providing effective support to teachers and principals: The extent to which the State, in collaboration with its participating LEAs, has a high-quality plan to provide teachers and principals with support and services (e.g., professional development, time for common planning and collaboration, and data analysis) in order to improve the overall effectiveness of instruction; and to continuously measure and improve both the effectiveness and efficiency of these supports through the use of rapid-time (as defined in this notice) student data.

Finally, we ask that the Department reconsider the use of the term “tenure” when discussing the reform plan criteria states must use for differentiating teacher and principal effectiveness based on performance (Reform Plan Criteria (C) (2) (iii)). The term “tenure” as it applies to K–12 education is too often mistaken by the public for the higher-education definition of a permanent appointment. Given the high-profile nature of the RTF, it would be helpful if the Department were more accurate in using this term and opting instead to use the phrase “continuing employment status.”

Turning Around Struggling Schools

One of the state reform criteria required for RTF applications deals with states' plans for increasing the supply of high-quality charter schools. Part of the required information requested in state applications is proof of "the extent to which the state has statutes and guidelines regarding how charter school authorizers approve, monitor, hold accountable, reauthorize, and close charter schools."

In addition to this information, we believe states should be required to disclose the number of charter schools a given authorizer and/or state has closed as evidence of the authorizer's and the state's commitment to the establishment of high-quality charter schools. We question whether increasing the number of charter schools is, in and of itself, an effective reform strategy. Doing so presupposes that all charter schools are high quality, but the NPP places no requirement upon charter schools, charter authorizers, or the states to increase the quality of charters as a condition for receiving RTF funds.

Overall Selection Criteria

Under the terms of the overall selection criteria, states are required to enlist the statewide support and commitment of key stakeholders such as "grant-making foundations and other funding sources." ASCD suggests that this provision be clarified to exclude funding and philanthropic support states receive for completing any grant applications. As you may know, the Gates Foundation has awarded fifteen states up to \$250,000 to hire business consultants to help complete their RTF applications. We do not think it is fair for states receiving such significant financial help also be given additional points in the selection process for this administrative support, especially since the criteria was obviously intended to consider funding for actual reforms to improve student achievement and not such a mundane bureaucratic use as applying for a grant.

Raising student achievement and closing gaps is clearly an objective of the RTF effort. The Reform Plan Criteria in section (E) (4) (i) seeks to measure this effort by relying on student reading and math scores on the NAEP. ASCD considers this a fundamental shift in the purpose of the NAEP and a significant change in the way in which NAEP scores are used. Predicating federal funding decisions on state student achievement gains benchmarked to NAEP is to utilize this respected assessment in ways for which it was never intended and is such a profound policy change that it is best to be made in the pending reauthorization of ESEA rather than through a federal grant application criteria.

With that in mind, the proposal should require state student achievement goals to be based on the existing Annual Yearly Progress (AYP) and percentage proficiency state targets required by the ESEA for both overall achievement as well as achievement broken down by subgroup. At the very least, should NAEP goals be included in the final criteria, these state targets should be no less than their ESEA proficiency goals.

Finally, we ask that the word "fiscal" be added to the list of those resources the state must utilize (section (E)(5)(iii)) in order to maintain reforms funded under the RTF grant monies after the funding period has ended.

Definitions

Under the section containing definitions for terms used within the NPP, ASCD seeks clarification on the following:

Effective principal: the definition states that an effective principal is one “whose students, overall and for each subgroup (described in section 1111(b)(2)(C)(v)(II) of the ESEA), demonstrate acceptable rates (e.g., at least one grade level in an academic year) of student growth (as defined in this notice).” By the use of “overall” do you mean *each* student in the school individually, as well as within their individual sub-groupings? The same question applies to the definitions of “effective teacher,” “highly effective principal,” and “highly effective teacher.”

Student achievement: in the definition of student achievement, the term “on track to graduate from high school” is used in section (b) when referring to nontested grades. ASCD seeks a definition of what the Department means by “on track” for non-high school grades as well as a clarification of what this definition means as it relates to students with special needs or limited English proficiency.

Clarification is also needed on the Race to the Top grant competition process as it is envisioned to operate at the state and local levels. For instance, it is unclear to what extent, if any, local districts that are statutorily required to receive 50 percent of a state’s Race to the Top funding are expected to affirm their support in writing to the state’s application or whether this expectation is only for districts working in partnership with the state as part of the other 50 percent of the funding to be used at the discretion of the state. Along those same lines, does the term “participating LEAs” refer to any local education agency receiving Race to the Top funding, or only to those districts working more closely and in formal concert with the state? Indeed, based on the language of section 14006(c) in the American Recovery and Reinvestment Act, it is not clear to us that any conditions can be placed on local districts to receive this share of fun