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February 2, 2015

The Honorable Lamar Alexander
Chairman, Senate Committee on Health, Education, Labor and Pensions
615 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Alexander:

Thank you for your leadership in prioritizing reauthorization of the Elementary and Secondary Education Act (ESEA) in the 114th Congress. ESEA is the cornerstone of federal education policy, and it is crucial that Congress passes an ESEA reauthorization bill that provides stability and a long-term vision for our education system. ASCD calls on federal lawmakers to align federal education policy with a coherent system that supports each student from early childhood through graduation; promotes accountability systems that provide a more comprehensive picture of student achievement, school success, and educator effectiveness; and ensures educators are supported throughout the career continuum to enhance their effectiveness, capacity for school leadership, and ability to influence student achievement.

ASCD appreciates the opportunity to review and comment on the draft and to provide you and the committee with our views and recommendations on specific provisions that are important to ASCD and its members.

Accountability

The true measure of student proficiency, educator effectiveness, and school quality must be based on more than just student test scores on a few state standardized tests. The No Child Left Behind (NCLB) Act's current accountability requirements have resulted in a narrowing of the curriculum, an emphasis on test preparation, and inappropriate school personnel decisions. Furthermore, although allowed, no states have incorporated other accountability measures into their federally mandated systems because the law doesn't provide a reward for meeting or exceeding such additional goals, and these goals serve only as further obstacles for schools to miss meeting the adequate yearly progress (AYP) requirement.

Although the discussion draft eliminates AYP and continues to allow the use of "other measures" in state accountability systems, we are concerned that not requiring states to include such additional measures will merely perpetuate the current practice of basing student, educator, and school accountability on test scores alone.

ASCD recommends that the bill include language stipulating that state test results should not be the sole measure of student performance, educator effectiveness, or

school quality, and should not be used for high-stakes purposes, such as personnel decisions or measuring school success. A new section 1111(b)(3)(G) could be added to the discussion draft that says “may not be relied upon as the only determinant of student performance, educator effectiveness, or school quality, and shall not be used for school personnel decisions or other high-stakes purposes.”

At the very least, ASCD strongly encourages the committee to provide more concrete examples of the measures states should use to evaluate student achievement, educator effectiveness and school quality. Examples include the following:

- For student performance: student work samples, progress on individualized growth objectives, student-centered evidence of learning, and performance-based demonstrations of understanding
- For educator effectiveness: data from student growth in the subject the educator teaches, observations, student and parent surveys, peer reviews, and self-reflection
- For school quality: school culture and climate, social and emotional supports, educator effectiveness, access to challenging experiences, and parental and community engagement

Assessments

The discussion draft proposes two options for student assessments: maintaining the currently required testing regimen, or allowing states to implement grade-span testing, use a combination of formative assessment results, use competency-based tests, rely on a system of local assessments, or even create new testing systems. As mentioned above, the use of state standardized tests in just two subjects for accountability purposes does not provide a comprehensive picture of student learning or address other factors that affect student engagement and well-being. When considering testing options, policymakers should consider the following questions:

- What are the purposes of regularly testing every student in reading and math?
- What is the ideal frequency of such state testing to meet state goals?
- How useful are test results for students, educators, and the public, and is their usefulness commensurate with the time and expense involved?
- Is grade-span testing a viable option or are there other alternatives?
- What existing state and local measures would provide a clear indication of how all students are doing in the absence of state tests?
- What measures of cognitive growth, social and emotional learning, and civic readiness would reveal how well schools are supporting the whole child?
- What information will help schools and communities identify strengths and challenges and promote continuous growth?

Supporting Teachers and School Leaders

Teachers and school leaders are the two most important in-school factors affecting student achievement. Thus, the foremost strategy and funding priority for federal education policy must be adequate and effective preparation and ongoing professional development for educators to improve student outcomes. Support for educators begins with preparation and practical training. Formal internships or induction will help beginning educators gain exposure, build capacity to address a broad array of challenges, and receive and act on constructive feedback. Throughout their careers, all educators should also receive personalized, job-embedded opportunities to build their capacity for improving student achievement and overall school quality.

We recommend that the bill include language that ensures the following:

- The creation of systems to support educators throughout the entire career continuum. Section 2001(2) could be revised to add language at the end that says "...and ensuring the creation of systems of support throughout the entire career continuum."
- State-developed evaluation systems are not based solely or significantly on student test results. Section 2101(c)(3)(B)(ii) could be revised to say "Developing or improving teacher, principal, and other school leader evaluation systems that are based on multiple measures of student learning and growth, but shall not be based solely on state standardized tests."
- Educators are evaluated only in the subjects they teach. Section 2101(c)(3)(B)(ii) could be revised to add the following language: "Educator evaluation systems created under this section must evaluate educators only in the subjects they teach."
- Results of educator evaluations lead to professional development opportunities that build the capacity of educators to improve student outcomes. Section 2101(c)(3)(B)(ii) Could be revised to add the following language: "Results of educator evaluations created under this section shall be used to guide ongoing professional development that increases the capacity of educators to improve student outcomes."

Funding Flexibility

Giving school and district leaders flexibility in determining how best to spend limited federal dollars is crucial to meet individual school and district needs. ASCD appreciates your support of local education leaders and their ability to make decisions that are in the best interests of their students. However, it is also important to ensure robust funding for educator support in Title II and a financial investment in student health and safety in Title IV. Allowing 100 percent transferability of funds between Title II and Title IV programs, and from Title II or Title IV programs, would jeopardize the availability of funding for educator professional development and

supports for students' social and emotional well-being. The investments made through both Title II and Title IV help schools meet the federal mandate to ensure a high-quality education for all students, particularly the disadvantaged, for whom effective educators and nonacademic supports are particularly important. Thus, we recommend that the bill maintain current law's 50 percent transfer authority.

The role of the federal government in education has historically been to provide equity and access to educational opportunities for disadvantaged and underserved student populations. The federal Title I program directs funding to districts and schools with a large proportion of low-income, high-need students and enables them to take advantage of economies of scale to combine resources and target them where needed. The portability provision in the discussion draft would undermine both the formula that allows local education leaders to leverage these funds to meet the unique challenges of schools with a large proportion of low-income, high-need students. It would dilute investments away from the schools that truly need them and diminish the effectiveness of the current funding system. Moreover, it presents significant administrative difficulties and introduces considerable uncertainty into the planning and budgeting processes. Thus, we recommend that the committee instead authorize a study of the effects of reallocating federal education funds based on portability.

The Whole Child

Today's employers are seeking high school graduates who are prepared for college, career, and productive citizenship. A whole child approach to education helps to ensure that students have access to challenging and engaging instruction in all academic subjects; social and emotional learning opportunities; in-school physical and mental health services; and community-based activities and support. Such an approach actively engages parents and promotes meaningful community partnerships. Although we appreciate the bill's support in Title IV for student mental and physical health and well-being, the whole child approach extends beyond just mental and physical health and includes all of the components mentioned above. We urge the committee to ensure that any ESEA reauthorization addresses the comprehensive needs of all students to meet the goals of the "Every Child Ready for College and Career Act."

ASCD is a nonprofit, nonpartisan membership organization whose 125,000 members in more than 138 countries are professional educators from all levels and subject areas—superintendents, supervisors, principals, teachers, professors of education, and school board members. ASCD is dedicated to a whole child approach to education, that ensures that each child in each school in each community is healthy, safe, engaged, supported, and challenged.

Thank you for the opportunity to share our policy priorities for ESEA reauthorization through these comments. For further information or if you or your staff has any questions, please contact ASCD Advocacy Manager Megan Wolfe at megan.wolfe@ascd.org or 703-575-5616.

Cordially,

A handwritten signature in black ink that reads "David Griffith". The signature is written in a cursive, slightly slanted style.

David Griffith
Public Policy Director