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June 8, 2012

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

Dear Mr. Secretary:

ASCD, representing more than 160,000 educators, appreciates the opportunity to comment on the notice of proposed priorities, selection criteria, and definitions for the Race to the Top District (RTT-D) competition. We support the department's efforts to incentivize districts to personalize teaching and learning, encourage them to provide differentiated instruction, and require them to devise and implement effective evaluations.

We have several recommendations and questions that we hope will be addressed prior to posting the final application.

**Selection Criteria—Vision:** The RTT-D competition draft requires applicants to delineate a vision that “will translate into increased improved student performance...as demonstrated” by several specific indicators. However, the only indicators listed are those that pertain to college readiness. We hope that the Department does not intend to indicate a preference for college readiness over career preparation but recognize that both are legitimate paths for high school graduates. For many students, the measure of success after high school graduation will certainly be acceptance to and enrollment in college. However, for many more students, success will be post-graduation employment and so career-ready indicators should also be reflected in the district's vision statement.

An additional measure required in the applicant's vision statement is students' performance on summative assessments. College, career, and citizenship readiness are not limited to proficiency on state standardized reading and math tests, but they include all disciplines and the comprehensive knowledge and skills required of students after high school graduation. Providing challenging, comprehensive curriculum across all content areas is essential for college, career, and civic preparation. Accordingly, curriculum and instruction in all areas must demonstrate high expectations for students and reflect evidence-based strategies. Measuring student achievement in all core content areas would provide a more comprehensive picture of achievement and growth. Thus, we recommend broadening the performance measure required in the vision statement to include multiple measures of student achievement in all core academic subjects including, but not limited to, subject areas in which statewide summative assessments exist, as well as requiring



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districts and schools to publicly report student achievement in core subjects, however it is measured or collected at those levels.

College- and Career-Ready Standards: We applaud the requirement that applicants adopt standards and assessments “that prepare students to succeed in college and the workplace and to compete in the global economy” as part of the core educational assurance areas. ASCD supports high standards for students, educators and schools. A rigorous curriculum and high standards are the means by which our children will receive a world-class education enabling them to compete in our global economy.

The current definition of college- and career-ready standards in the draft executive summary provides two types of acceptable standards. One is that states may use standards that are “approved by a State network of institutions of higher education.” We would appreciate clarification about whether this needs to be a discrete and affirmative certification of the standards by the state network of institutions of higher education. The question arises if the institutions of higher education in a state network are members of the National Collegiate Athletic Association (NCAA), which requires adherence to the association’s initial eligibility requirements for prospective student athletes. These requirements are intended to ensure that students can handle the rigors of first-year college coursework and thus be considered college ready. Initial eligibility criteria include a certification that students have satisfactorily met the state-required secondary school courses necessary for graduation. Would a state network’s membership in the NCAA (and application of its initial eligibility requirements) be sufficient to meet the draft’s certification of standards requirement?

Evaluations: ASCD supports rigorous but fair evaluations for educators and school leaders. Any evaluation of a teacher’s effectiveness must be based on a combination of inputs, including, but not limited to, student performance, classroom observations, and parental feedback. In addition, such evaluations must be used for educators’ continual improvement and professional growth. Evaluations for teachers and school leaders should include valid, clearly defined, and reliable performance standards and rubrics. School leader evaluations should also be based on demonstrated leadership skills, including providing a clear school vision and direction; implementing rigorous curriculum and related activities; and supporting a culture of learning, collaboration, and professional behavior.

The RTT-D Executive Summary definitions of teacher and principal evaluation systems should reflect all of these components, in particular differentiating between those components relevant to teachers from those relevant to school leaders.

The teacher and principal evaluation system definitions identify “data on student growth for all students” as a “significant factor” in the evaluation criteria. We



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recommend language to ensure that student performance or “student growth” constitutes not more than 50 percent of this measurement.

The proposed superintendent and school board evaluations are required to reflect “student outcomes performance”, rather than the “student growth” language in the teacher and principal evaluations. Would aligning the language in the four evaluation requirements provide clearer guidance to districts as they develop these evaluation systems? There is significant variance between student growth and student outcomes performance, the latter of which could be construed to reflect only testing results in reading and math. In any case, we would again urge the Department to ensure that this component does not constitute more than 50 percent of the evaluation of superintendents and school boards.

Personalized Learning: ASCD is pleased with the RTT-D’s strong focus on personalized learning, directing districts to differentiate instruction to meet the needs of each child. ASCD believes that a comprehensive approach to learning recognizes that successful young people are knowledgeable, emotionally and physically healthy, safe and cared for, motivated, civically inspired, engaged in the arts, prepared for work and economic self-sufficiency, and ready for the world beyond their own borders. Together, these elements support the development of a child who is healthy, safe, engaged, supported and challenged. Given the recognition by the department of personalized learning as paramount to student success (as demonstrated by this proposed grant competition), a belief ASCD shares, we recommend that the department similarly elevate personalized learning by requiring its inclusion in school turnaround strategies promoted by the department.

Effective integration of student supports in the school environment is crucial to supporting the whole child. We are heartened that the Competitive Preference Priority would require districts to address the social-emotional, behavioral and other needs of students—which are important components of meeting the needs of the whole child. Thus, we recommend that the department consider making the integrated services option part of the core educational assurance areas to ensure that the services that districts provide to students are coordinated and delivered in a way that supports the whole child.

Teaching: ASCD strongly supports the draft’s requirements with regard to teaching. Effective teaching is the number one indicator of student success. Empowering educators to become effective in their role by enabling them to implement personalized teaching and learning for all students is an important step toward improved student achievement and success after graduation.



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ASCD has been a long-time advocate of a whole child approach to education for each child, in each school, in each community. Personalized learning strategies that best meet and support each individual student's needs are an essential component of a whole child education. We are gratified and commend the U.S. Department of Education for recognizing and promoting the importance of personalized learning as reflected in this competition proposal. True student success and effective school reform are dependent upon an education system that recognizes the individual needs of each student, accommodates the diversity of the school and the community it serves, and offers worthy educational opportunities for everyone. We look forward to continuing to work with the department toward the attainment of our mutual goals.

Cordially,

A handwritten signature in black ink, which appears to read "David Griffith". The signature is written in a cursive, somewhat stylized script.

David A. Griffith  
Director of Public Policy