

# **Forum on Educational Accountability**

[www.edaccountability.org](http://www.edaccountability.org)

Re: Race to the Top Fund – Notice of Proposed Priorities, Requirements, Definitions and Selection Criteria – Docket ID ED–2009–OESE–0006

## **Draft Guidelines for ‘Race to the Top’ Has Some Good Ideas, But Priorities Need Changing**

*Re Regulatory Alternatives Considered, pp. 48-49*

The Forum on Educational Accountability (FEA) appreciates the opportunity to respond to Education Secretary Duncan’s “Draft Guidelines” for the “Race to the Top Fund.”

Fundamentally, FEA concludes that a number of the priorities in the Draft Guidelines must be considerably revised.

FEA’s comments are rooted in its two statements, the “Joint Organizational Statement on No Child Left Behind (NCLB) Act” (2004) and “Empowering Schools and Improving Learning: A Joint Organizational Statement on the Federal Role in Public Schooling” (2009); and its two reports, “Redefining Accountability: Improving Student Learning by Building Capacity” (2007) and “Assessment and Accountability for Improving Schools and Learning: Principles and Recommendations for Federal Law and State and Local Systems” (2007). The first two documents are appended to the end of these comments. All published FEA materials are on the web at <http://www.edaccountability.org>.

FEA is an alliance of national education, civil rights, religious, disability, parent, union, and civic organizations supporting comprehensive public school reform. For the Race to the Top (RTTT) Guidelines to advance that goal (*I. Proposed Priority 1, pp. 10-11*), the federal government should encourage states’ applications to answer a central question: Which systemic changes would significantly improve schools’ capacity to successfully teach a challenging curriculum in the classroom and parents’ capacity to support high level learning at home? Building those capacities is the heart of successful public school reform.

In evaluating state applications, the Department should give the most weight to the factors most critical to strengthening teaching and learning (*III. Selection Criteria, 1<sup>st</sup> paragraph, p. 23*):

- improving the quality of assessments;
- providing for effective professional development of teachers, principals and other educational staff;
- ensuring equity and opportunity to learn for all children;
- enhancing family support for student learning and family involvement with schools; and
- building state capacity to assist systemic improvements in public schools.

## **Assessments:**

*III(A)(2), (A)(3), and (B)(3)(i), Proposed Selection Criteria, pp. 26-28 and Definitions, “Formative Assessment,” p. 40, “High-quality assessment,” p. 41, “Student achievement,” p. 43 and “Student growth,” pp. 43-44.*

The Guidelines’ emphasis needs to be on states overhauling their assessment systems in line with FEA’s published recommendations, including as follows. (FEA takes no position on “common standards.”)

- The Guidelines must emphasize that state assessments – or any national assessments or common assessments created by consortia of states based on new common standards - need to go beyond using predominantly multiple-choice tests to incorporating performance assessments. In the words of President Obama, these can show student ability to “use technology, conduct research, engage in scientific investigation, solve problems, present and defend their ideas.” New assessment systems also should include the use of locally-based evidence of student learning, in addition to state level exams. Further, state evaluations of “student achievement” need to incorporate additional data, such as high school graduation rates.
- New systems also need to help teachers develop and use classroom-based “formative assessments.” These provide teachers with prompt feedback on what their students do and do not understand, and they enhance teachers’ skills in adjusting instruction accordingly to meet the needs of individual students.

## **Data Collection/Opportunity to Learn:**

*III(B)(1)(2)(3), Proposed Selection Criteria, pp. 27-29, III(C)(3), pp. 30-31 and Definitions, “High-quality assessment,” p. 41, “Student achievement,” p. 43 and “Student growth,” pp. 43-44.*

FEA supports the Guidelines’ having states expand their collection of “statewide longitudinal data systems” to include out-of-school factors such as students’ health and postsecondary experience. The Guidelines should also call on states to collect and publish data on resource inequities (disparities in the opportunity to learn), such as the extent to which not only qualified staff, but also buildings, libraries and other material resources necessary for a high quality education, are being provided in some public schools in the state and not in others. Then, the states need to be required to develop strategies to overcome the inadequacies and inequities. In line with our Assessment recommendations, data on student learning must use standardized test scores as only one modest component, relying more on other information about student learning and progress.

## **Teacher and Principal Quality:**

*III(C)(2), Proposed Selection Criteria, pp. 29-30 and Definition, “High-quality assessment,” p. 41.*

- It is important to strengthen the evaluation of educators, and evaluations may include "teacher and principal effectiveness based on performance." But it should be made clear that if systems use student "achievement" data in evaluating teachers and principals, then "achievement" must include evidence of student learning in which student scores on state exams are at most only a small portion.
- The Draft is correct that assessments should be appropriate for a full range of students, including students with disabilities, English language learners and other student populations that are the prime focus of federal improvement efforts.

*III(C)(5), Proposed Selection Criteria, pp. 31-32 and Definitions, "Instructional improvement systems," pp. 41-42 and "Persistently lowest-performing schools," pp. 42-43.*

- The Draft's section on "[p]roviding effective support to teachers and principals" needs to be greatly expanded. "Professional development" and "time for common planning and collaboration" are not merely necessary to help teachers and principals use quickly available ("rapid-time") formative assessments to "inform current ... instruction," but are critical to improving teacher and principal knowledge and skills generally. Likewise, mentoring is essential to meet educators' individual pedagogical and leadership needs. Career ladders must be established for mentor teachers and other specialists to support ongoing teacher and principal improvement. The Guidelines should require states to focus these improvement efforts on the highest poverty/lowest achieving schools among the "persistently lowest-performing schools," including how they will address the unique and challenging education needs of various specific student populations attending public schools, such as Native Americans and recent immigrants. In its NCLB reform proposal, FEA has emphasized that it is important for the Government to support such efforts by allocating substantial sums for those purposes (e.g., an amount equal to 20% of Title I funds).

### **School Turnaround:**

*III(D)(3), Proposed Selection Criteria, pp. 33-35.*

The Draft's priorities proposed for turning around struggling schools need to be reversed. Replacing school governance, converting schools to charters or private management, or closing them down should be de-emphasized. At a minimum, the five options allowed under NCLB should not be narrowed, as the Draft does. Primarily, emphasis must be on transforming schools by improving leadership and instruction through intensive professional development, peer collaboration, mentoring, career ladders and other educational supports for staff.

### **Family Engagement:**

*III(D)(3), Proposed Selection Criteria, pp. 33-35.*

Similarly, providing "mechanisms for family and community engagement" must be given a higher priority and should no longer be relegated to the last initiative in the Draft's lowest

ranking turn-around option. Specifically, States need to provide programs of adult literacy and parenting skills for parents of very low-performing students to increase parental support for student learning at home, as well as adult mentors for students without parents available. And states and school districts need to provide programs to engage families to be directly involved with the schools. This is essential so that staff and parents, or other responsible adults at home, will be working together to transform the children's learning. In its NCLB reform proposal, FEA has emphasized that it is important for the Government to support such efforts by allocating substantial sums for those purposes (e.g., an amount equal to 5% of Title I funds).

### **Improving State Capacity**

*III(E)(5), Proposed Selection Criteria, pp. 37-38.*

While the Draft soundly recognizes the value of building the capacity of state departments of education to support school improvement generally, the chief focus needs to shift. States qualifying for RTTT funds should be required to greatly expand their staffs' knowledge and skills in how to assist, and, where necessary, lead transformations of low-performing schools. In its NCLB reform proposal, FEA has emphasized that it is important for the Government to support such efforts by allocating substantial sums (e.g., an amount equal to 2% of Title I funds) to building states' capacities to assist districts and schools implement systemic change.

FEA recognizes that RTTT operates within the structure of NCLB. But, while NCLB has some strengths, it also causes serious harmful consequences (such as those identified in the attached Joint Statement), is ineffective in dramatically improving student learning and needs to be fundamentally overhauled. In its RTTT Guidelines, the Department should do all that it legally can to ameliorate the negative impacts of NCLB in the short term. Beyond that, the Department should work with Congress to write a new Elementary and Secondary Education Act that will put FEA recommendations for comprehensive, systemic school improvement at the center. FEA would be pleased to assist the Department in that process.

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Note: The Forum on Educational Accountability includes some of the organizations that have signed the *Joint Organizational Statement on No Child Left Behind*. Signers agree to the goals of the *Joint Statement* and seek to implement its recommendations. Additional statements made by FEA reflect this commitment, but may not reflect all individual positions taken by signatories.

The texts of both appendices are at <http://www.edaccountability.org>.

Appendix 1: Joint Organizational Statement on NCLB, with list of signing organizations.

Appendix 2: Empowering Schools and Improving Learning, with list of signing organizations.