

Forum on Educational Accountability

www.edaccountability.org

September 5, 2007

George Miller
Chairman
House Committee on Education

Howard P. "Buck" McKeon
Senior Republican Member
House Committee on Education

Dale E. Kildee
Chairman
Subcommittee on Early Childhood,
Elementary and Secondary Education

Michael Castle
Senior Republican Member
Subcommittee on Early Childhood,
Elementary and Secondary Education

Dear Sirs:

The Forum on Educational Accountability (FEA) is a working group seeking to implement the Joint Organizational Statement on NCLB, now signed by 139 national education, civil rights, religious, disability, parent, civic, and labor groups, representing 50 million Americans. FEA applauds the House Committee on Education and Labor for making public a discussion draft of proposed revisions to the Elementary and Secondary Education Act/No Child Left Behind (NCLB). We are pleased that the Committee incorporated some of our major proposals. However, we believe more significant changes are necessary if the law is to fulfill its goal of ensuring all children succeed in high-quality schools.

FEA supports the Committee draft for including some new, important provisions, including:

- * authorizing states to use valid and reliable local assessments as part of their state assessment systems and a pilot project to help states develop such assessments;
- * allowing states to use indicators other than only reading and math scores in determining school and district progress; and
- * reforming the school improvement process to provide more assistance and give schools more time to implement necessary changes once they adopt an improvement plan.

These initiatives are valuable, but they do not go far enough. As the recent poll by Phi Delta Kappa/Gallup demonstrates, the U.S. public seeks fundamental reforms in NCLB, consistent with those proposed by FEA. The Committee draft falls short of that goal by:

- * overemphasizing testing at the expense of improving teaching and learning;
- * continuing to rely on sanctions that have no evidence they will be successful; and
- * paying too little attention to correcting NCLB's perverse incentives, which narrow curriculum and reduce education to test-prep, especially for the "left behind" groups.

The law, while improved, would remain too much a test and punish law. To ensure that the federal role becomes strongly supportive of genuine school improvement, FEA supports the following additional changes in ESEA:

- Replacing the goal that nearly all students score "proficient" by 2014 and the Adequate Yearly Progress mandate based on it -- targets that nearly all experts agree are impossible to attain -- with an accountability approach based on implementing systemic changes that will improve teaching and learning and on demonstrating steady progress in learning results consistent with the rates of improvement at the nation's better Title I schools.

- Increasing the weight given to indicators other than reading and math tests, so that schools will be supported in providing a comprehensive curriculum to educate the whole child.

- Giving schools sufficient time to implement improvement plans before more drastic steps are taken.

- Allowing districts and states more flexibility to develop effective solutions for schools that have not turned around since there is no strong evidence to support any of the required options for "redesign" proposed in the Committee draft.

- Offering adult literacy and parenting skills programs to build parents' capacity to support their children's learning at home and adult mentoring or similar programs for children without parents available, and strengthening the parent involvement provisions.

- Strengthening some aspects of the language on professional development, recognizing that most of the planned improvements in that area will be in Title II.

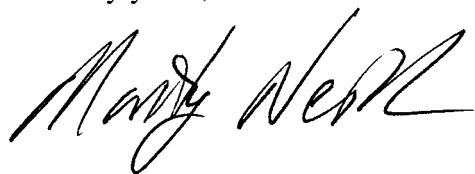
- Ensuring that sufficient funds are authorized to include all eligible children in Title I and to enable the implementation of the improvement initiatives in the law.

- Ensure that sufficient funds are authorized so include all eligible children in Title I and to support the many improvement proposals in the law.

FEA participants will be making additional recommendations to address concerns with the provisions specifically affecting English language learners, students with disabilities, and students with gifts and talents. We are particularly concerned that the assessments for many students in these groups will remain inadequate even with the changes proposed in the discussion draft, and that these assessments could lead to unfair and unhelpful actions taken against schools with significant numbers of such students.

We look forward to working with the House Education Committee to further improve ESEA. FEA participating organizations would be pleased to discuss our ideas and recommendations with you. The Joint Statement and the detailed FEA recommendations are on the web at www.edaccountability.org, or we would be pleased to send them to you electronically.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Monty Neill". The signature is fluid and cursive, with the first name "Monty" written in a larger, more prominent script than the last name "Neill".

Monty Neill, Ed.D.
Chair

Cc: all members of the House of Representatives