



August 28, 2009

Office of Elementary and Secondary Education
Attention: State Fiscal Stabilization Fund Comments
US Department of Education
400 Maryland Avenue, SW
Room 3W329
Washington, DC 20202

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Re: State Fiscal Stabilization Fund, Docket ID ED-2009-OESE-0007

To Whom It May Concern:

This letter provides several recommendations in response to the notice published in the Federal Register on the State Fiscal Stabilization Fund (SFSF) program. Achieve supports the U.S. Department of Education (Department) in its efforts to encourage states to publish data on indicators measuring progress towards the core education reforms of the American Recovery and Reinvestment Act (ARRA). Recognizing the additional resources required for states to collect and report data on new indicators, we would like to recommend a limited set of additional data that the Department should require states to provide.

Achieve believes that requiring states to report data around our additional proposed indicators will strengthen their ability to meet the requirements of Section 14005 (d)(4)(C) of ARRA. This section asks states to assure that they take steps to improve their academic content standards and student academic achievement standards consistent with the America COMPETES Act, including changes to high school graduation requirements, high school assessments, and other policies that align those policies with the knowledge and skills students need to be prepared to enter and succeed in entry-level, credit-bearing postsecondary coursework, the 21st century knowledge-based economy, and the Armed Forces. We believe that the Department's proposed metrics are necessary but not sufficient to providing the public with information about the steps states are taking to meet those goals.

To that end, we recommend that the Department consider adding the following two indicators regarding assurance (C) of the SFSF program, Standards and Assessments:

1. **The number and percent of students *in each grade* who are enrolled in and successfully complete a college- and career-ready high school curriculum (aligned with college- and career-ready standards), disaggregated by NCLB subgroup categories and reported at the state-, district-, and school-level.**

Taking a rigorous course of study in high school that reflects college and career expectations in English and mathematics improves access to and success in first-year, credit-bearing college courses; improves entry into and completion of postsecondary training programs; and is one of the strongest predictors of whether a student will ultimately earn a college degree. Yet low-income and minority students are less likely to have access to and enroll in a college- and career-ready

curriculum in high school than their more advantaged peers.

All 50 states and the District of Columbia have already defined for the Department what a college- and career-ready high school curriculum should look like through the Academic Competitiveness Grants Recognized State Rigorous Secondary School Programs of Study. In addition, 20 states and the District of Columbia have aligned their high school graduation requirements with a college- and career-ready course of study.

With the implementation of longitudinal data systems that include the 12 elements in the America COMPETES Act, states will be able to determine how many students are taking and succeeding in such a course of study. The Department should require that states report this information, disaggregated by subgroup at the state-, district-, and school-level, so state and local leaders can carefully monitor how many and which students take a college- and career-ready course of study, as well as how many and which students take a less rigorous curriculum.

2. The number and percent of students who graduate from high school (consistent with 34 CFR 200.19(b)(1)(i)), enroll in an institution of higher education, and are placed into one or more remedial courses during their first year at the institution, disaggregated by NCLB subgroup categories and reported at the state-, district-, and school-level.

The Department's proposed indicators already require states to report the number and percentage of students that graduate from high school (Indicator (C)(11)); the number that graduate from high school and enroll in higher education (Indicator (C)(12)); and the number that graduate and go on to complete at least one year's worth of college credit within two years (Indicator (C)(13)). Each of these indicators is important for evaluating whether schools are preparing students to complete high school with the knowledge and skills required for success in postsecondary education and training.

However, the Department should also require states to report on students' academic readiness for postsecondary-level work, which none of the currently proposed indicators will do. Data on the percentage of students placed into remedial or development courses in their first year of college measures students' academic preparation in high school – and excludes any interference from the social, financial, or other barriers to credit accumulation that may arise when students are enrolled in college.

We recognize that, in most states, there is not a common statewide standard for placing students into remedial courses, so this measure is not as precise as it should ideally be. But, requiring states to collect and report this data is a good way to encourage them to improve the measure itself.

The SFSF program requires states to make progress towards implementing statewide longitudinal data systems – including progress towards collecting data on our two proposed indicators of college- and career-ready course-taking and postsecondary remediation. **However, the Department's proposed SFSF notice does not require states to publicly report this critical information.** Achieve believes it is imperative that states publicly report schools' and students' progress on *all* of these indicators – those currently proposed by the Department and those we recommend. We strongly encourage the Department to add our proposed indicators under Assurance (C), Standards and Assessments, to allow parents, students, educators, state leaders, and the public to know whether and how well high schools are preparing students for success.

Thank you for the opportunity to review and comment on the proposed notice for the State Fiscal Stabilization Fund program. We encourage you to consider these recommendations and look forward to working with you in the coming months to ensure the SFSF helps states increase the rates at which students graduate high school prepared for their next steps.

Sincerely,

A handwritten signature in black ink that reads "Michael Cohen". The signature is written in a cursive style with a large, prominent "M" and "C".

Michael Cohen