



August 28, 2009

Office of Elementary and Secondary Education  
Attention: Race to the Top Fund Comments  
US Department of Education  
400 Maryland Avenue, SW  
Room 3W329  
Washington, DC 20202

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Re: Race to the Top Fund Comments, Docket ID ED-2009-OESE-0006

To Whom It May Concern:

The Race to the Top (RTTT) Fund presents states with an historic opportunity to make dramatic reforms to their P-20 education systems and accelerate their efforts to graduate all high school students prepared for college and careers. Achieve commends the U.S. Department of Education (Department) for making a central feature of the Race to the Top criteria a state's commitment to developing and adopting common, college- and career-ready, internationally-benchmarked academic standards and assessments aligned to those standards. We also applaud the Department's efforts to reward states for developing a comprehensive strategy in which their plans in each of the core education reform areas are aligned to the goal of providing students with the knowledge, skills and support necessary to graduate high school prepared for postsecondary opportunities and success in the knowledge-based economy.

In the proposed RTTT notice, the Department aims to evaluate a state's capacity to achieve comprehensive education reform using a broad range of criteria. Given Achieve's specific expertise on a subset of issues within the proposed Race to the Top framework, we would like to offer recommendations in a few key areas that we believe will strengthen the quality of RTTT applications states submit, as well as improve the likelihood that states winning RTTT grants will increase the rates at which students – particularly students in low- or under-performing schools – graduate equipped with the knowledge and skills for success after high school.

#### **Proposed Priority 1: Comprehensive Approach to the Four Education Reform Areas**

As the Department evaluates how comprehensively states address all four assurances in their RTTT applications, **we encourage you to pay particular attention to whether and how a state weaves college and career readiness (as emphasized in the adoption of common, college- and career-ready, internationally-benchmarked standards and assessments required under Assurance A: Standards and Assessments) throughout its plans for the other assurances.** For example:

- To what degree does the state prioritize collecting, reporting, and facilitating the use of data on key indicators of college and career readiness, such as the percentage of students enrolled in and earning credit for a college- and career-ready course of study in high school?
- To what degree does the state ensure that its strategies for improving teacher and leader effectiveness will address critical gaps in schools'

capacity to graduate all students college- and career-ready, such as: the equitable distribution across schools of teachers at all grade levels with the content knowledge and pedagogical training necessary to prepare all students to reach college- and career-ready standards by the end of high school, including teachers prepared to teach rigorous, upper-level content in mathematics, science, and English language arts to all students?

- Does the state ensure its strategy for turning around the lowest-performing schools includes measures and metrics for school accountability – particularly for high schools – that are based on measures of progress towards college- and career-ready standards, rather than those currently in use in many states which aim lower?

### **Proposed Application Requirements**

Few states could successfully implement bold and innovative RTTT reform plans without sustained commitment from key state leaders, and the Department is right to require that applications carry the signature of the state’s governor, chief state school officer, and the president of the state board of education. However, commitment from and collaboration with higher education leaders is required for states to ensure that their college- and career-ready standards and assessments have credibility with the postsecondary community and that the standards will open doors for students after high school through admissions, placement, and/or other incentives.

**Therefore, we recommend that you add an additional competitive priority under the proposed application requirements to ask states to submit applications also signed by one or more of the state’s higher education leaders, such as the state higher education executive officer or the head of each of the state’s postsecondary systems.**

### **Proposed Selection Criteria: Overall Selection Criteria**

In addition to getting support for its RTTT application from higher education system leaders, states should be encouraged to mobilize the support of the state’s broader higher education community, as well as the business and employer community. While proposed **Overall Reform Conditions Criteria (E)(3)** does ask states to demonstrate the commitment of state and local leaders, Achieve believes the **Department should expand this criterion by asking states to demonstrate that the following constituencies are committed to supporting and participating in the design, implementation, and sustainability of RTTT reforms:**

- **Higher education community, including system, campus, and faculty leaders; and**
- **Business community, including the state’s leading employers, companies, and business organizations.**

Without engagement and collaboration from start to finish with these two stakeholder groups, states may find that the college- and career-ready standards and assessments upon which their RTTT plans are predicated will not have credibility in the world students must be prepared to enter after high school graduation.

### **Proposed Selection Criteria: Standards and Assessments**

Achieve is delighted that the Proposed State Reform Conditions criteria on standards and assessments ask states to demonstrate evidence of serious work towards adopting common, college- and career-ready, internationally-benchmarked standards and assessments. These standards will help align the high school curriculum with the demands of postsecondary education and careers, and the development of common assessments aligned to those standards gives states a significant opportunity to improve the quality of their assessments dramatically, as well as to reduce costs and allow for comparability of results across state lines.

Achieve’s research has shown that, in most states, current high school assessments measure knowledge and skills students learn early in high school – or even middle school. Without sufficient emphasis on the advanced high school content students need to be successful in postsecondary education and training opportunities, state assessments will not provide the critical information that teachers, parents, and students need to evaluate students’ progress towards college and career readiness.

We recognize that the Department plans to provide more clarity around criteria for state assessments aligned to the common standards when it releases public notice on the proposed separate Standards and Assessments Competition. In that proposed competition and in this one, **Achieve wants to ensure that state assessment systems are anchored in college and career readiness, just as the standards will be.**

Central characteristics of such an assessment system include:

- Large-scale “anchor assessment(s)” pegged to college- and career-ready standards for the end of high school.
  - These assessments could take several different forms (e.g. end-of-course exams, cumulative assessments taken toward the end of high school), but they should be designed for the purpose of determining if students have met state college- and career-ready standards are ready to enter college and postsecondary training opportunities.
  - The anchor assessment(s) should measure whether students have gained the academic skills they need in reading, writing and mathematics to enroll in and succeed in credit-bearing, non-remedial, college courses. If they have not, the assessments should identify gaps in students’ knowledge and help educators identify what adjustments students may need in their high school course work to become fully prepared.
  - These assessments should also be validated by the postsecondary system and used to place students into credit-bearing, freshman courses.
- The entire K-12 assessment system should be vertically moderated to the anchor assessment(s), including any other assessments given statewide earlier in high school, so that “proficient” on these assessments means prepared, and so students, parents, and educators can determine whether students are on-track towards meeting the end-of-high school, college- and career-ready standards by graduation.

### **Proposed Selection Criteria: Data Systems to Support Instruction**

Achieve applauds the Department for evaluating states on the extent to which they have implemented the 12 elements of a longitudinal data system included in the America COMPETES Act. Robust P-20 longitudinal data systems will help policymakers and decision-makers have critical pieces of information about students’ progress towards college and career readiness. They help policymakers identify in which schools there are too few teachers prepared to teach high-level math courses to all students; in which districts too few ninth graders are on track to achieve at the college- and career-ready level on the statewide high school assessment; in which classrooms too many students are off-track to scoring proficient on end-of-grade or end-of-course exams in key subjects; and how many – and which – students across the state take a course of study that will develop the skills they need to succeed and persist in postsecondary education and the workforce.

The Data Quality Campaign, of which Achieve is a managing partner, has submitted more extensive recommendations regarding the proposed RTTT notice, which we support. However, we also have a few additional recommendations we would like to share with the Department.

To date, a significant majority of states have implemented about half of the data system elements included in the America COMPETES Act – including unique student identifiers, student-level enrollment and test data, and student-level graduation and dropout data – all of which are important for building the base of a robust system. However, too few states have implemented the data system elements most critical to measuring and reporting student progress towards meeting the college- and career-ready, internationally-benchmarked standards they are encouraged to adopt through RTTT. Therefore, **we encourage the Department to prioritize under Proposed Selection Criteria (B)(1) whether states have implemented – or plan to expedite implementation of – two of the data system elements most critical to measuring and reporting progress towards college- and career-ready goals:**

- ***Student-level transcript information, including information on courses completed and grades earned.*** States that require – or want to encourage – students to take a college- and career-ready course of study cannot do so without data that show – for schools, districts, and the state – in which courses students enroll *and* earn credit. According to Achieve’s research, only 17 states currently have this ability.
- ***The capacity to link K-12 data systems with higher education systems.*** Achieve’s research shows that only 23 states have the ability to match student records between K-12 and higher education, while only 12 annually match student records across systems. Without this ability, the state, districts, and schools cannot evaluate the progress of individual students through the K-12 system and into postsecondary, including critical information such as the percentage of students from each high school enrolling in institutions of higher education; taking remedial or developmental coursework in college; or the points at which students exit, transfer in, transfer out, drop out, or complete P-16 education programs.

As the Department rightly acknowledges in Proposed Reform Plan Criteria (B)(2), stakeholders – including educators, policymakers, parents, students, and the public – need access to transparent, easily understandable information about how well students are performing. Most states already use school, district, and state report cards to share with the public basic data about schools’ performance on current high school tests and graduation rates. However, in many states, these report cards are not sufficient indicators of readiness for success in postsecondary education.

#### **Proposed Selection Criteria: Turning Around Struggling Schools**

Achieve commends the Department for requiring states to develop plans to turnaround the lowest-performing schools through RTTT. For too long and in too many states, these schools have been responsible for producing a disproportionate number of students who reach adulthood unequipped for college or careers – despite requirements under the Elementary and Secondary Education Act for states to intervene in and turn around these institutions. If they do nothing else, states *must* develop a comprehensive strategy to turnaround their lowest-performing 5% of schools and, after successfully turning them around, support their continued success towards college and career readiness for all students. However, we encourage the Department to ask states to set higher sights.

In their comments on the Department’s proposed RTTT notice, The Education Trust, Center for American Progress, Democrats for Education Reform, and Education Equality Project present compelling evidence that, as currently proposed, the Reform Plan Criteria in Section (III)(D)(3) will severely limit the number of schools – and particularly high schools – in which states would be required to intervene through RTTT funding. According to their analysis, the proposed Reform Plan Criteria (D)(3) would lead to interventions at only 612 schools over the entire period of RTTT funding, rather than the 1,000 schools per year that U.S. Secretary of Education Arne Duncan has suggested RTTT will help. These

groups have also determined that this criterion would allow 27 states to intervene in *only 5 schools* throughout the entire RTTT grant period.

Given the unprecedented amount of resources that will be awarded to states through RTTT grants, Achieve believes it is insufficient to settle for supports and interventions in such a small number of schools nationwide. While unprepared students are concentrated in the lowest 5% of chronically struggling institutions, many students pass through other schools each year without gaining the skills and knowledge they need for their next life-steps. Even in high-performing schools, some students still drop out; others meet basic state proficiency standards and graduate, but do not demonstrate the knowledge and skills needed for success in college and careers. States that are serious about college and career readiness need to address both persistently low-performing *and* higher-performing, but still not adequate, institutions that fail to prepare significant shares of students for their next steps. It would be a serious missed opportunity not to challenge states to use these unprecedented resources to carry through on the college- and career-ready standards and assessments they are developing and adopting through RTTT.

**To that end, Achieve recommends that you add a Reform Plan Criterion under assurance (D) that encourages states to identify – in addition to the lowest performing 5% of schools – another priority group of schools with significant percentages or numbers of students who are not meeting college- and career-ready standards, and to provide differentiated supports and interventions tailored to those schools’ needs.**

To identify whether schools are preparing students for college and careers, we recommend that you encourage states to use the following strategies:

- Broaden the indicators used to assess school performance so they paint a more comprehensive picture of college and career readiness, including:
  - The percentage of students graduating high school, measured by the four-year cohort high school graduation rate;
  - The percentage of students taking and completing a college- and career-ready course of study;
  - How students perform on statewide assessments of college and career readiness;
  - How many students are earning college credit while in high school;
  - How many students enroll in postsecondary education after high school; and
  - How many students enroll in remedial courses in their first year of college.
- Set ambitious statewide performance goals tied to those indicators;
- Implement meaningful public reporting on those indicators;
- Value and incentivize performance on those indicators by including them in the metrics used for the state’s accountability determinations;
- Set a trajectory for each school from its current performance to what is needed to meet college and career readiness goals.<sup>1</sup>

As states raise standards to a more ambitious college- and career-ready level, the rising number of “identified” schools will make differentiation among schools all the more important: schools falling below the line will be very different from one another and require very different interventions and

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<sup>1</sup> In *Measures that Matter*, a joint publication by Achieve and The Education Trust, we present similar proposals in more detail and encourage you to refer to <http://www.achieve.org/measuresthatmatter> for more information and to read the full report.

supports. The chronically lowest-performing 5% of schools would still be identified as those farthest from meeting college- and career-ready goals and would still demand the most intensive and dramatic solutions. But states should also be prepared to meet the broader imperative to help all of their schools prepare students for college and careers and substantially increase the rates at which their students graduate prepared for their next steps.

Achieve recognizes that the strategies for intervening in and supporting the lowest-performing 5% of schools necessarily differ from those used in other institutions. States will need to develop a set of supports, interventions and consequences tailored to the problems and needs identified based on schools' progress against our proposed performance measures.

Thank you for the opportunity to review and provide comments on the Proposed Race to the Top Notice. We encourage you to consider these recommendations and look forward to working with you in the coming months to ensure RTTT helps states meet their goals of graduating all students prepared for college and careers.

Sincerely,

A handwritten signature in black ink that reads "Michael Cohen". The signature is written in a cursive, flowing style.

Michael Cohen