

COALITION FOR STUDENT ACHIEVEMENT

August 28, 2009

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: "Race to the Top" Docket ID: ED-2009-OESE-0006

Dear Mr. Secretary:

On behalf of the Coalition for Student Achievement (CSA), we are writing to comment on the U.S. Department of Education's proposed priorities, requirements, definitions and selection criteria for the "Race to the Top" (R2T) Fund. The CSA is committed to ensuring that federal education funds available through the American Recovery and Reinvestment Act (ARRA) are leveraged to both stimulate economic recovery and drive education reform that will dramatically improve U.S. student achievement. The members of the coalition are engaged with federal, state and local policy leaders to increase U.S. K-12 student performance, raise high school graduation rates and better prepare American students for college and the 21st century workplace.

The passage of the ARRA earlier this year provided nearly \$100 billion to fund education programs throughout the nation. The great promise of the ARRA for education was that providing an unprecedented infusion of federal aid could both save jobs -- teachers, principals and others -- *and* also jump start education reform efforts in America's lowest performing schools. From our vantage point, the ARRA appears to be making progress in its goal of staving off job cuts, but its attempt to stimulate reform has yet to produce measurable results. In fact, based upon our own analysis of approved State Fiscal Stabilization Fund (SFSF) applications, over 85 percent of the funds dedicated for education are being used to supplement prior state and local funding as opposed to supporting reform related initiatives. Furthermore, while every state that received SFSF funds is required to implement reform-oriented "assurances," it is extremely unclear how much attention is being devoted to ensuring that these commitments are actually being implemented on the ground.

This leaves the \$4.35 billion R2T Fund as the one real chance for education reform out of the billions of dollars that will eventually be spent on education. It is crucial that the Department make the most out of this opportunity by adhering faithfully to the major principles of reform that are embedded in the authorizing language that created this program. Since the creation of the U.S. Department of Education, no Secretary has had more resources, flexibility and power

at his or her disposal to shape a lasting reform agenda. Bold action is required to turn the potential of this program into reality.

With this in mind, the CSA has carefully reviewed these draft guidelines, and while in need of some improvement, we believe this proposal could potentially allow the Department to use the R2T Fund to drive real, measurable reform. Many of our organizations intend to write you individually with recommendations regarding specific components of this guidance. Collectively, however, we want to express our strong support for the emphasis the Department has placed in this draft on implementing such key education reform principles as: using data to improve student achievement and measure teacher, principal and school performance; improving state charter school laws; encouraging the creation of a common set of standards among the states; and reinvigorating state and local efforts to turn around low performing schools.

While there is much to commend in this draft, we remain cautious about the overall promise for successful outcomes as a result of this investment. Many of us are long time veterans of the education reform movement, and we have seen the various reforms come and go over the years. Each of these initiatives was well intended, and each, in its own way, achieved some success and helped to lay the groundwork for future improvements. Yet, none of these reforms fully lived up to their promise, largely because of the depth of change needed, the difficulty in finding the best solutions, and opposition from those with vested interests in the status quo.

That's why the Department's implementation of this program will be crucial to the ultimate success or failure of the R2T Fund. In that light, we urge you to consider the following recommendations:

Bolster your Commitment to Reform. We commend the Department for requiring states to address the four assurances in a comprehensive manner. In terms of focusing the program on systemic reform, this "absolute priority" is a very solid start. We believe however that the current language is much too ambiguous in making it clear exactly which provisions are truly "required" and which are merely suggested. For example, we urge the Department to make it absolutely clear that eligible states must be supportive of charter schools, adopt internationally benchmarked standards and assessments, be committed to making hard decisions needed to turn around low performing schools and reform outdated school personnel rules, among other things.

We urge the Department to be more specific in describing the expectations of this grant competition; ambiguous language opens the door to unintended consequences. For example, the guidance appears to set a new standard for accountability by requiring states to set "ambitious, but achievable" goals. Such language inadvertently invites states to justify very low expectations for performance, even below what is currently required in the No Child Left Behind Act (NCLB). Equally important, we urge the Administration to select peer reviewers with extensive knowledge and relevant experience, and to use a rigorous process for evaluating applications and annually monitoring those states that ultimately receive funding.

Strengthen the Department’s Technical Assistance to States and Districts. Successful implementation of this program – along with other ARRA programs – will not be easy. The Department needs to provide fair, clear and unambiguous guidance, technical assistance and oversight to recipients of these funds. This may mean devoting more resources, hiring more personnel and focusing more brainpower on this effort within the Department. The Department must also improve its efforts to describe exactly how the requirements in both the R2T and SFSF programs are to be coordinated with NCLB to reduce confusion and ease the burden of implementation on the ground. There are skeptics who do not believe the Department of Education is up to the effort. We urge you to prove them wrong.

Use the Leverage of Multiple Payments. Ongoing payments of R2T funds should be based on evidence of progress to assure real, demonstrable movement toward the goals. Common standards provide an example; without multiple payments based on demonstrated progress, R2T will provide no incentive for strong states funded in the first round to adopt the common standards in later months. If R2T is to truly generate strategies and resources that can be shared across states, a substantial portion of funds must be devoted to investments – including instructional tools, professional development and other investments – that are aligned with adopted common standards.

Improve Transparency. Finally, we encourage you to promote a higher degree of transparency with respect to the R2T Fund. In particular, we urge the Department to post on the internet all state applications prior to approval in addition to requiring that all states post their annual goals and annual reports in a timely and user-friendly format to the public. This transparency is crucial to ensure public confidence in the review process and to fully understand how states intend to implement reforms through this initiative.

Thank you for your consideration of our views. Please know we stand ready to help in any way, and appreciate your commitment to education reform.

Sincerely,

The Coalition for Student Achievement, Steering Committee

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