



Recommendations for the Reauthorization of the Elementary and Secondary Education Act

Recommendation 1

Codify the goal of graduating all students from high school on time, ready for college and careers.

College and career readiness—rather than the mere proficiency in basic skills—must be the goal of K–12 education. The Alliance supports the U.S. Department of Education’s *A Blueprint for Reform* (hereafter referred to as the “blueprint”) goal that state standards lead to college and career readiness by the end of high school. Certainly state adoption of the common core state standards would satisfy this requirement. In regard to any other proposed method of states certifying that their standards are college- and career-ready, it is important to have both higher education and business involved to ensure that this is a rigorous certification that students and parents can count on to signify readiness for success in college and careers. In regard to the state-developed common core standards, the Alliance recommends that ESEA reauthorization support, not require, state adoption.¹

Recommendation 2

Hold states, districts, and schools accountable for achieving the goal of college and career readiness.

ESEA reauthorization should require states to publicly report overall and for each subgroup at the school, district, and state levels: (a) the percentage of students who have demonstrated college and career readiness through assessments aligned to the college- and career-ready standards, and (b) the percentage of students graduating with a regular diploma according to the common definition provided by the U.S. Department of Education in its October 2008 regulations (Title 34 C.F.R. 200.19(b)(1)). Further, the revised accountability system must ensure the measurements of high school graduation and college and career readiness are accurate, reliable, and support instruction.

Graduation Rates:² The Alliance applauds the blueprint’s inclusion of graduation rates as a cornerstone of the proposed accountability system for states, districts, and schools. The Alliance recommends that ESEA reauthorization codify and strengthen key elements of the 2008 Title I regulations, including:

- *Definition of graduation rate:* All states, districts and schools should be required

¹ For more details on the Alliance’s recommendations regarding standards, read [Common Standards: The Time Is Now](#).

² For more details on the Alliance’s recommendations regarding graduation rate accountability, read [Every Student Counts: The Role of Federal Policy in Improving Graduation Rate Accountability](#).

to calculate the four-year adjusted cohort graduation rate for accountability purposes.

- *Extended-year adjusted cohort rate:* States, districts, and schools should be allowed to calculate and report one or more extended-year rate. However, the four-year rate must be the primary indicator used for accountability purposes. For example, if a weighted average of the four-year and extended-year rates will be permitted under the new law, we recommend that the four-year rate be assigned a significant portion of the weight.
- *Targets and growth goals:* The 2008 regulations require states to set graduate rate goals, as well as “continuous and substantial” growth targets. As included in the Every Student Counts Act (S. 618/H.R. 1569), the Alliance recommends that states, districts, and schools be required to have a graduation rate goal of at least 90 percent, and a growth goal of at least 3 percent annually for all students and each subgroup.
- *Equal weight:* Graduation rates must receive equal weight to test scores in the new accountability system.
- *Incentives for recovery:* With over one million students dropping out of school annually, action must be taken to identify and reconnect high school dropouts to education. ESEA reauthorization should include accountability incentives for schools and districts to recover dropouts and provide them with a rigorous course of study toward achieving a meaningful high school diploma. It should also include flexibility for alternative high schools predominantly serving dropouts or over-aged/undercredited students to be held appropriately accountable, and not be penalized for failing to meet the same high graduation targets and growth goals of “regular” high schools.

Assessments:³ ESEA reauthorization must ensure that high school accountability includes results from assessments that measure student progress toward college and career readiness and hold schools, districts, and states accountable for progress on those measures. This is reflected in the blueprint’s statement, “performance targets, based on whole-school and subgroup achievement and growth, and graduation rates, will guide improvement toward [the] ambitious goal” of college and career readiness.

An effective assessment system is critical to meaningful accountability and to the implementation of college- and career-ready standards. There is a growing recognition that accountability assessments by themselves cannot serve all of the purposes assessments need to serve. Therefore, the reauthorized ESEA should support states and state consortia in developing comprehensive assessment systems that include the following:

³ For more details on the Alliance’s recommendations around assessments, read [Principles for a Comprehensive Assessment System](#).

- *Formative assessments* that show what students truly understand and that can be used to tailor instruction toward students' individual needs.
- Data that informs school leaders about *teachers' effectiveness* at improving student learning and that suggests *professional development strategies*.
- *A mix of measures*, including projects, portfolios, and research papers, scored by teachers using a moderated scoring system. Such measures will help ensure that students are attaining the core learning goals expressed by college- and career-ready standards, and not simply low-level content and skills that are relatively easy to measure using multiple-choice exams.
- Where appropriate, assessments built on *learning progressions*, that is, the pathways students take toward mastering a subject area.

Recommendation 3

Support state- and district-led school improvement systems that are data driven; differentiate reforms and interventions to meet the specific needs of districts, schools, and students; and address the lowest-performing secondary schools.

ESEA reauthorization must replace NCLB's flawed, one-size-fits-all school improvement process with requirements for state- and district-led systems that are differentiated and data driven, and prioritize the lowest-performing high schools. The Alliance applauds the blueprint's differentiated approach, emphasis on the lowest-performing schools, and the flexibility given to the majority of the nation's schools to improve performance. In response to the blueprint's proposed structure of "Reward" and "Challenge" schools and districts, and four proposed reform models, the Alliance offers the following observations and recommendations:⁴

Data-driven Reform: ESEA reauthorization should leverage states to develop and/or employ comprehensive school improvement systems that utilize school performance data to differentiate among low-performing high schools, plan interventions, drive resources, and demonstrate progress toward college and career readiness. Such school performance indicators should be aligned to college- and career-ready standards and be used along with local school reviews to analyze school performance, determine the type of support needed for improvement, and guide the school improvement process.

With regard to high schools, the Alliance recommends including the comprehensive array of school performance indicators as proposed by the Graduation Promise Act (GPA) (S. 1698/H.R. 4181). GPA includes indicators of high school engagement and effort, student advancement, educator quality, and academic learning. Rather than prescribing federal reform models, ESEA reauthorization should emphasize—as GPA does—the use of local performance and school review data in driving decision-making about appropriate interventions. Further, the reauthorization should offer a

⁴ For more details on the Alliance's recommendations around the need to address the nation's lowest-performing high schools, read [Action Required: Addressing the Nation's Lowest-Performing High Schools](#).

range of reform options and allow local flexibility in determining the most effective research-based interventions to meet locally determined needs of districts, schools, and students.⁵

Supportive School Categorization: ESEA reauthorization should require states and districts to use data to differentiate among schools' needs. By categorizing the highest-performing schools as Reward schools, the lowest-performing schools as Challenge schools, and providing no label to schools with moderate performance, the blueprint offers a helpful structure in which a comprehensive school improvement system can be developed. Building upon this structure, the Alliance offers the following observations and recommendations:

- *Reward schools:* The Alliance concurs with the blueprint's intention of providing incentives for exemplary performance and offering avenues for high-performing schools to share and replicate best practices. However, the Alliance recommends using caution with the notion that such schools should receive additional financial resources or competitive advantages in federal grant competition because, by definition, Reward schools have fewer needs than lower-performing schools.
- *The unlabeled middle:* Under the blueprint, the vast majority of schools would be unlabeled and would not be required to take any specific action in order to strengthen performance. The Alliance finds this problematic for several reasons:
 - a) The majority of schools fall under this category and a significant number of these schools will be marginally higher performing than the Challenge schools. However, under the proposed structure, they are not required to take any specific action. The Alliance proposes that *all* schools not designated as Reward schools be required to implement a school improvement plan that is data driven and includes research-based interventions tailored to the needs of the individual school and the students attending such school.

Federal education policy need not require implementation of the specific interventions. However, it is appropriate for education policy to call upon all schools that are not excelling to implement reforms that will strengthen performance. Additionally, federal policy should offer guidance with respect to interventions that will strengthen district and school capacity to enhance teaching and learning. For example, a school in the "middle" category could be required to implement a targeted reform in response to the diagnostic analysis referenced above. This might include reorganizing the school day to allow for common planning time for teachers or block scheduling; using a college- and work-ready curriculum; personalizing the school experience through academic and social support; increased professional development, etc.

⁵ For more details on the Alliance's recommendations regarding the appropriate federal role in education, read [Reinventing the Federal Role in Education: Supporting the Goal of College and Career Readiness for All Students](#).

- b) The advantage of being categorized as a Reward school is ambiguous and is likely to be insufficient to drive reform among the unlabeled middle.
- *Challenge schools*: The Alliance applauds the blueprint’s emphasis on the lowest-performing schools and agrees that it is appropriate for federal policy to be more directive with regard to the reform activities pursued by chronically underperforming schools than by other schools. Challenge schools need robust action, not just another assessment of their poor performance. However, we urge consideration of the following observations with regard to the four turn-around models outlined in the blueprint:⁶
 - a) The strategy undertaken at each school should be driven by a robust analysis of the causes of the school’s poor performance, as well as the resources within the school, district, state, and community to support its improvement. School reforms should be implemented based on an analysis of need and capacity, not a firm federal prescription. The reauthorization of ESEA should more clearly delineate the elements of a diagnostic analysis of challenges and resources to be used in determining the most effective interventions within Challenge schools. Again, the Alliance supports the approach proposed in the GPA.
 - b) The centerpiece of two of the proposed reform models is the firing of the school principal (transformation and turn-around models) and the replacement of at least half of the teachers within the school (turn-around model). While the Alliance agrees that teacher/leader effectiveness is paramount to school success, it is unfamiliar with research suggesting that these strategies should be required as part of successful school reform. While the Alliance supports the notion that staff replacement may be a necessary, though difficult, component of reform, it calls upon the school improvement activities required by the reauthorized ESEA to be data driven and tailored to the individual district, school, and student.
 - c) Rural schools and districts may find it particularly challenging to implement one of the four reforms proposed in the blueprint. For example, attracting and retaining effective teachers and principals is a challenge in rural areas and significant staff replacement may not be a viable option in many rural communities. Again, school reforms should be implemented based on an analysis of need and capacity, rather than federal prescriptions for reform.⁷
 - d) Chronically low-performing schools will not improve unless changes are made to the *teaching* and *learning* within the school or its replacement. Merely mandating changes to governance and/or staffing will not address those needs. The reauthorization of ESEA should provide guidance about the types of teaching and learning strategies that should be the core of the reform plan. Again, the Alliance supports the approach proposed in the GPA.

⁶ For more details on the Alliance’s recommendations regarding whole school reform, read [Whole-School Reform: Transforming the Nation’s Low-Performing High Schools](#).

⁷ For more details on the Alliance’s recommendations regarding rural high schools, read [Current Challenges and Opportunities in Preparing Rural High School Students for Success in College and Careers](#).

- e) School-site approaches must be accompanied by district-wide activities that are necessary to support school success. This includes improving data analysis and use, supporting the development and usage of formative assessments, developing multiple pathways for students, offering wrap-around services, and equitably distributing teachers and leaders.
- f) The blueprint calls upon Challenge districts and schools to “fully and effectively” implement one of the intervention models within three years, and offers two years of additional funding to support ongoing improvement if progress is being made. Research and experience demonstrate that the implementation of significant school reform can take between five and seven years to reach fruition. At a minimum, the Alliance recommends providing five-year grant awards, and allowing renewal grants based on effective performance.

Recommendation 4

Strengthen federal investment in secondary schools, including a formula-based funding stream to turn around low-performing secondary schools as proposed by the Graduation Promise Act.

Dedicated Funding for Secondary Schools: Roughly two thousand high schools produce more than half of the nation’s dropouts, and many more low-performing high schools are in need of significant support. As proposed by the Graduation Promise Act (GPA) (S. 1698/H.R. 4181) and Success in the Middle Act (S. 1362/H.R. 3006), the reauthorized ESEA must include a regular, formula-based funding stream to turn around low-performing secondary schools, and prioritize the lowest performing.⁸

Such a funding stream is critical for achieving the goal of college and career readiness for the nation’s students for several reasons:

- a) Due to underreporting poverty at the high school level, district-level decisions about the allocation of Title I funds, and the overall underfunding of Title I, high schools are largely unsupported by Title I funds. The nation’s high schools receive only 10 percent of Title I funding. However, these schools serve 23 percent of the nation’s low-income students. Further, the average Title I allocation per low-income high school student is 40 percent lower than in elementary schools. In order to support the nation’s high schools without undercutting existing efforts to support elementary schools through Title I, a separate, formula-based funding stream must be established as proposed by the GPA.
- b) The Alliance is concerned that the School Turnaround Grants are viewed by many to be the primary federal response to the nation’s lowest-performing high schools. However, 40 percent of the nation’s “dropout factories” are ineligible for Title I,

⁸ For more details on the Alliance’s recommendations regarding the nation’s dropout factories, read [Prioritizing the Nation’s Dropout Factories](#).

making them also ineligible for a School Turnaround Grant.⁹ Support should be provided to low-performing high schools regardless of Title I status.

- c) In addition, such a funding stream would support continuous improvement in these lowest-performing schools even after they have turned around, recognizing that research demonstrates that poverty drives much of a school's low performance, and the income level of students remains the same even if a school improves. Low-income students continue to require additional support to ensure that the school continues to be effective.

Support for Innovation: Funding should be provided to test and disseminate innovative approaches for high school reform, as proposed by the Secondary School Innovation Fund Act (S.968 and H.R. 2239).

Implementation of College- and Career-ready Standards: States are leading the development of common college- and career-ready standards, and states themselves will decide whether to adopt these standards. The strength and impact of the standards will be determined by their implementation. The reauthorized ESEA should support the implementation of college- and career-ready standards—whether or not a state adopts the “common core” standards—through such activities as aligned curriculum, assessment, and professional development.¹⁰

Strengthening Adolescent Literacy: The reauthorized ESEA should incorporate the Literacy Education for All, Results for the Nation Act (LEARN Act) (S.2740 and H.R. 4037) to support literacy throughout the grade spans towards preparing students for college and careers. Funding should be provided to invest in highly effective preparation and professional development to ensure that teachers have the knowledge and skills to provide literacy instruction as part of content-area course work.

Strengthening Data Systems: ESEA reauthorization must continue, expand, and improve the federal investment in state and district data systems that can collect and analyze student, school, and system performance data, as well as educator capacity to use that data to improve teaching, learning, and student outcomes.

The mission of the Alliance for Excellent Education is to promote high school transformation to make it possible for every child to graduate prepared for postsecondary learning and success in life.

The Alliance for Excellent Education is a national policy and advocacy organization, based in Washington, DC, working to improve national and federal policy so that all students can achieve at high academic levels and graduate high school ready for success in college, work, and citizenship in the twenty-first century.

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⁹ A “dropout factory” is a high school where 60 percent or less of the freshman class matriculates into senior year on time.

¹⁰ A detailed explanation of the Alliance’s recommendations regarding college- and career-ready standards, read [*Common Standards: The Time Is Now*](#).