



To: U.S. Department of Education
From: Alliance for Excellent Education
Date: July 24, 2014
Re: Comments: Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs

The Alliance for Excellent Education (the Alliance) appreciates the opportunity to comment on the U.S. Department of Education's (ED's) proposed supplemental priorities and definitions for use in ED's discretionary grant programs. Funding from these grants provides opportunities to increase the number of students who graduate from high school with the requisite skills to be successful in college and a career.

The Alliance is particularly pleased to see an emphasis on projects that are fully aligned with standards that prepare students for both college and a career. For example, Proposed Priorities 2 and 3 would support projects that promote personalized learning and the development of competencies such as strong academic content and academic mindsets. Further, Proposed Priority 6 would support projects that integrate rigorous education and training in a career pathway program, which is reflective of the goals of the Obama administration's proposed High School Redesign Program.

Please find below comments from the Alliance in response to several of the proposed priorities. The Alliance can provide additional evidence or information in support of the comments if needed.

Proposed Priority 2: Influencing the Development of Non-Cognitive Factors

Recommendation: Support projects that develop means by which to measure non-cognitive factors and their impact on different subgroups.

Rationale: According to the National Research Council (NRC),¹ *interpersonal* competencies are among the range of competencies that support deeper learning among students. Competencies within the *intrapersonal* domain include three clusters of competencies (intellectual openness, work ethic and conscientiousness, and positive core self-evaluation). Each of these clusters includes competencies, such as flexibility, initiative, appreciation for diversity, and metacognition (the ability to reflect on one's own learning and make adjustments accordingly). *Interpersonal* domain competencies include two clusters of competencies: teamwork and collaboration, and leadership. These clusters include competencies such as communication, collaboration, responsibility, and conflict resolution. According to the NRC,² there is a need to support programs of research that more clearly define and develop assessments of these competencies. In particular, they should provide sustained support for the development of valid, reliable, and fair assessments of intrapersonal and interpersonal competencies.

Measuring "non-cognitive" skills are best demonstrated in the service of intellectual, or "cognitive" activities, not independent of those cognitive activities. For example, students should be persistent³ and set goals *while doing their work*. These abilities are not ends in and of themselves, but they make it

possible for students to perform higher levels of thinking and problem solving. Projects that develop a range of competencies should embed these opportunities for development within their academic programs. For example, the use of projects that are highly motivating to students requires students to (1) develop and complete long-range plans, (2) persist and make course corrections when faced with challenges, and (3) consistently assess progress.

It is important to be able to assess the development of these competencies and their impact on student performance, including by subgroups. ED should support the development of tools to measure interpersonal competencies, and where appropriate, projects receiving funding should promote and measure the development and impact of these competencies.

Proposed Priority 3: Promoting Personalized Learning

Recommendation: In addition to supporting projects (a) and (b) that use personalized learning to prepare students for mastery of college- and career-ready skills, this proposed priority should include projects that (c) implement models of professional development that support personalized learning and data use. The projects should be designed to help educators develop new skills in adaptive instruction, assessment literacy, and use of digital tools and programs.

Rationale: Data collection is a vital component of personalized learning, but educators must receive training in how to effectively use data in order to teach in a more personalized manner. For example, in 2007, Chicago Public Schools (CPS) initiated a reform to utilize data in order to prevent students from dropping out. Evidence shows that students who end their ninth-grade year on track to graduation are almost four times more likely to graduate from high school than those who are off track. Therefore, CPS promoted the use of data to monitor students' performance, help teachers intervene before students fell too far behind, and implement a variety of interventions to address the specific needs facing students as identified by the data. At the center of this effort were monthly data reports given to each high school that allowed educators to respond when students were heading in the wrong direction. As a result of this effort to effectively use data to keep students in school, the percentage of ninth-grade students who are on track to graduation has risen 25 points, from 57 to 82 percent, and graduation rates have increased 13 percentage points.⁴

As discussed in the Alliance publication, *Policies and Capacity Enablers and Barriers for Learning Analytics*, progress has been made in recent years with state-level and district-level data and assessment systems; however, the impact of data and assessment on day-to-day instructional practices “continues to be sporadic and inconsistent in most districts and schools across the country.”⁵ In some cases, there is an overwhelming quantity of data without an organized approach to using it; in others, useful data is not available in a timely manner. Data can allow teachers to differentiate instruction in ways that did not exist even a few years ago. Nonetheless, the lack of capacity in many states, districts, and schools to use data limits its effective use to personalize learning.⁶ Discretionary grant programs should therefore also support projects that provide educators with professional development on effective strategies for personalized learning and data use.

Proposed Priority 4: Improving Academic Outcomes for High-Need Students

Recommendation: The definition for “academic outcomes” should include student progress toward meeting standards for college and career readiness and indicators of deeper learning. This progress can be measured in part through use of student academic achievement and growth indicators (i.e., credit accumulation, grade-point average, enrollment and performance in Advanced Placement, International



Baccalaureate, dual enrollment, or early college programs), graduation rates, and postsecondary rates of enrollment, remediation, persistence, and completion. In addition to improving traditional academic outcomes, ED should promote the cultivation of key competencies, including critical thinking, problem solving, communication, and collaboration.

Rationale: American schools tend to offer a two-tiered curriculum. Too many students—primarily low-income and students of color—have focused almost exclusively on basic skills and knowledge, while primarily white and relatively affluent students have had opportunities for content mastery as well the ability to develop the crucial competencies of critical thinking, problem solving, communication, and collaboration. These “deeper learning” competencies, combined with mastery of rigorous academic content, comprise the outcomes of a K–12 education system focused on college and career readiness. “Academic outcomes” should include measures that are indicative of the development of the full range of skills necessary to be successful in college and a career.

Recommendation: The definition of “learning environment” should include indicators of a positive learning environment, such as access to rigorous and advanced course work, fair and equitable discipline policies and practices, multi-tiered systems of support, and effective teaching.

Rationale: The Office for Civil Rights (OCR) Civil Rights Data Collection (CRDC) collects and reports education access and equity data from the nation’s public schools on a biannual basis. The CRDC includes, among other data, information about the inequities in students’ access to and success in rigorous/advanced courses; distribution of experienced and licensed/certified teachers; and the application of school discipline policies. This data paints a disheartening picture of what is happening in many of the nation’s schools.

To fully assess a “learning environment,” projects should examine a variety of indicators as a whole. A series of reports by the Alliance finds correlations between access to rigorous course work, the presence of experienced and certified teachers, and rates of school discipline.⁷ For example, the higher a school’s percentage of students receiving free or reduced-price lunch or percentage of students of color, the lower the school’s percentage of students taking or passing Advanced Placement exams or being taught by experienced or certified teachers. Higher rates of school discipline incidents were statistically significant and positively correlated with having more low-income students or students of color. Projects should be required to identify and measure a comprehensive set of learning environment indicators, including access to equitable discipline policies, rigorous course work, and effective teaching.

Proposed Priority 5: Increasing Postsecondary Access, Affordability, and Completion

Recommendation: In addition to supporting the existing proposed projects (a) through (f), this proposed priority should include projects that (g) support the development and implementation of dual enrollment and early college high school programs.

Rationale: The Alliance appreciates that this proposed priority includes strong language regarding preparing students for college and a career. Dual enrollment and early college high school programs increase college enrollment, accelerate the time to degree completion, and reduce the total cost of college. Research shows that participation in dual enrollment can increase high school graduation rates and increase college enrollment and persistence.⁸ For example, a comprehensive evaluation of early



college high schools finds that 22 percent of early college students earned a college degree (usually an associate’s degree) compared to just 2 percent of comparison students who did not attend an early college high school.⁹ Moreover, students often earn college credit, free of charge, when participating in these programs, which can reduce their financial burden in college. Dual enrollment and early college high school programs align with this proposed priority to support discretionary programs that increase postsecondary access, affordability, and completion (see the Alliance’s recommended definitions for “dual enrollment” and “early college high schools” under the “New Proposed Definitions” section).

Recommendation: This proposed priority should include projects that (h) support the development and implementation of an ongoing feedback process between institutions of higher education and local educational agencies.

Rationale: Of students who enroll in college, 20 percent need at least one remedial course.¹⁰ Postsecondary remediation increases student’s time and costs of obtaining a degree. Collaboration between K–12 and higher education is needed to identify students who are not on a path to postsecondary success. This proposed priority should support development and implementation of an ongoing feedback process between institutions of higher education and local educational agencies to strengthen instruction and reduce the need for postsecondary remediation (see the Alliance’s recommended definition for “ongoing feedback process” under the “New Proposed Definitions” section).

Proposed Priority 6: Improving Job-Driven Training and Employment Outcomes

Recommendation: In addition to supporting existing proposed projects (a) through (e), this proposed priority should include projects that (f) modernize the high school experience through districtwide efforts that integrate rigorous academic preparation with career-based classroom learning, real-world workplace experiences, and wraparound student supports.

Rationale: Proposed projects (a) through (e) are important as individual endeavors; however, research and practice demonstrate that these elements need to be implemented comprehensively and systemically—not simply as individual projects or programs within a school—in order to maximize outcomes for students. For example, the James Irvine Foundation initiated a comprehensive high school reform effort in California called Linked Learning that systemically integrates rigorous academic preparation with career-based classroom learning, real-world workplace experiences, and wraparound student supports. Evaluations of Linked Learning show that, compared with their peers, students in certified Linked Learning pathways earn more credits, are more likely to be on track to graduate from high school ready for college,¹¹ and are more likely to graduate from high school and enroll in a four-year college.¹²

In addition, as currently drafted, it is unclear whether ED intends for this priority to be applied to high school students. Considering the evidence demonstrating the impact of Linked Learning, career academies, and other reform efforts that provide a work-oriented approach to high school reform, ED should clarify its intention to apply this priority to projects supporting high school reform.



Proposed Priority 8: Implementing Internationally Benchmarked College- and Career-Ready Standards and Assessments

Recommendation: Subsections (b) and (c) support projects that develop and implement professional development and instructional strategies that are aligned with college- and career-ready standards. These projects should be specifically designed to develop teacher capacity to implement opportunities for deeper learning (i.e., learning opportunities for students to think critically, apply strong content knowledge, communicate effectively, collaborate with peers, and be self-directed).

Rationale: Projects should provide professional development opportunities that help teachers develop and implement multi-tiered instructional frameworks designed to maximize college- and career-ready skills. Specifically, (1) instructional strategies that support student mastery of rigorous content knowledge and the ability to apply this knowledge; (2) creating lessons that provide students with opportunities to utilize critical thinking skills and solve complex problems; (3) creating opportunities for students to work collaboratively with their peers; (4) providing a variety of means for students to communicate and demonstrate learning; (5) creating a classroom environment where students can be self-directed; and (6) providing ongoing feedback to students based on student data.

It is important to note that instructional strategies that support these standards need to vary at the middle and high school levels, focusing on making students' work more relevant to college and career readiness; increasing teacher competency in specific content areas; developing ways to support the connection between rigorous content and practical experience; and using project-based learning aligned with college- and career-ready standards.

Such opportunities should include support for teaching in designing and implementing project-based and applied learning opportunities that are fully aligned with college- and career-ready standards; the effective use of curriculum-embedded performance measures that support students in demonstrating these deeper learning competencies; and effective use of data from assessments to inform and adjust instruction and learning activities.

Recommendation: Subsections (b) and (c) support projects that develop and implement professional development and instructional strategies that are aligned with college- and career-ready standards. These projects should be specifically designed to enable teachers to improve literacy instruction.

Rationale: Middle and high school subject-area teachers need extensive training and support to interact with students in ways that deepen students' understanding of a subject area by connecting thinking and understanding with strategic reading and effective writing. The act of reading and writing within content areas expands students' conceptual understanding while improving their abilities to read informational text, communicate effectively, and write persuasively. Yet high schools vary considerably in the degree to which reading and writing are incorporated into all students' course work. According to a national survey of writing practices at the high school level, students were rarely asked to complete writing assignments involving analysis and interpretation; assignments requiring more than a single paragraph occurred less than once a month in half of all high school classes.¹³



According to the Alliance publication, *Advancing Adolescent Literacy: Pennsylvania's Keystones to Opportunity Comprehensive Literacy Program*, effective models of professional learning—job-embedded, ongoing, and research-based—should provide teachers with expertise in literacy instruction specific to their content area.¹⁴ Teachers need knowledge and skills to (1) increase the effectiveness of teaching their subject area by focusing on the use of literacy and reasoning practices within the content areas; (2) provide more and varied opportunities to read in class; (3) increase their use of formative assessment, which has been shown to produce substantial learning gains, particularly for low-achieving students;¹⁵ and (4) provide support for students practicing new literacy skills while developing their ability to direct and monitor their own learning.

Proposed Priority 9: Improving Teacher Effectiveness and Promoting Equal Access to Effective Teachers

Recommendation: Require projects to demonstrate the quality, validity, and effectiveness of their teacher evaluation and improvement system. In addition, this should include the means by which such a system is capable of assessing the preparation and skill level of early career teachers for whom there is insufficient student data. Such indicators may include performance on edTPA, a validated teacher performance assessment developed by the Stanford Center for Assessment, Learning, and Equity in partnership with the American Association of Colleges of Teacher Education. An edTPA provides early career teachers with the opportunity to demonstrate their ability to be effective in the classroom.

Rationale: Equitable distribution based on state performance systems is only as effective in meeting the goal of equity as the system is for measuring teacher performance and building capacity. A nationwide study of twenty-nine districts by the Institute of Education Sciences demonstrates that there are persistent gaps in access to effective teachers, yet most districts do not use evaluation data for system improvement and to improve the capacity of teachers to be effective.¹⁶ Moreover, as states and districts move toward the implementation of teacher evaluation systems, concerns arise regarding the quality of these systems. For example, a report by the American Psychological Association to the Council for the Accreditation of Educator Preparation (CAEP) Commission states, “The vast majority of protocols for observing teacher performance in present use, whether in teacher preparation or for practicing teachers in the field, lack evidence of reliability and validity. Most are ‘home-grown’ assessments derived from focus groups or consensus. If they are ‘off the shelf,’ then the evidence for psychometric properties may well be lacking. In short, the ‘market’ for selection and use of observational protocols lacks the very contingencies that would drive selection of appropriate instruments or the use of them in ways likely to produce results that are fair, valid, or useful for evaluation or improvement.”¹⁷

Further, according to a 2013 report by the National Council on Teacher Quality, there is significant variation in state performance evaluation systems and the extent to which data is used to inform policy and practice.¹⁸ If equal access is based on determinations of effectiveness, the systems that serve as the basis for that evaluation must be rigorous, comprehensive, aligned with college- and career-ready standards, and able to drive continuous improvement of practice. Otherwise, not only will students of color and students from low-income families continue to have less access to effective teaching, the magnitude of the disparity may never be fully captured and addressed.



Proposed Priority 11: Leveraging Technology to Support Instructional Practice and Professional Development

Recommendation: In addition to supporting existing proposed projects (a) through (d), this proposed priority should include projects that (e) develop and implement a comprehensive plan for technology integration. This plan should include curriculum planning, teacher training, technology planning, and the reallocation of resources aligned with the goal for personalized, student achievement.

Rationale: Schools and districts are facing enormous pressure to purchase technology and effectively deploy digital learning strategies as a means of personalizing instruction. Nonetheless, digital resources, data platforms and personal Internet devices will not achieve the desired results without proper district and school level planning aligned to this new paradigm of personalized learning.

This proposed priority should support the development and implementation of a comprehensive plan for technology integration. Schools and districts must think systemically as they integrate technology into their education systems. A report from the Alliance for Excellent Education, *Creating Anytime, Anywhere Learning for all Students: Key Elements of a Comprehensive Digital Infrastructure*, urges that adequate broadband access be accompanied by a comprehensive “digital infrastructure” that unlocks the potential of technology to enhance student learning.¹⁹ The report adopts a broader definition of digital infrastructure that includes professional learning, changes in pedagogy, parent and community engagement, and assessment and data systems.²⁰ This notion of a digital infrastructure is also supported by the Aspen Institute’s report on Student Centered Learning in a Digital World.²¹

Recommendation: This proposed priority should include projects that (f) develop and implement models of professional development for educators on how to effectively use digital resources and student data.

Rationale: Educators need professional development on how to use digital resources and student data in order to fully realize the potential of those tools and information. In a study of the implementation of student information systems (SIS) and learning management systems (LMS), Gartner, Inc. found that almost 70 percent of information technology (IT) professionals reported that the use of data by the teacher was not a focus of the systems implementation plan.²² Discretionary grant programs should therefore also support projects that provide educators with professional development on strategies for utilizing digital resources while effectively using student data.

Recommendation: This proposed priority should include projects that (g) develop and implement district-level data privacy policies and training for all school and district staff.

Rationale: Educators need guidelines to follow regarding school district policies on data privacy. Districts need to develop strong privacy protection policies, data breach response plans, and designate a single point of contact on privacy. Policies and contracts regarding student data should be transparent and easy for parents and guardians to understand and access.²³ In an increasingly digital world and classroom, districts need to update their policies to meet these new learning environments, which are being supported in this proposed priority.



Proposed Priority 13: Improving School Climate, Behavioral Supports, and Correctional Education

Recommendation: Support projects that improve school climate by focusing on increasing student engagement and connectedness to learning. This should include projects designed to increase academic relevancy and support, such as opportunities for applied learning, and developing teacher capacity to connect with and support with diverse learners from diverse backgrounds.

Rationale: Strengthening relationships between students and teachers has shown positive effects on students feeling connected to their learning and on their academic achievement. Students who perceive their teachers and other adults in the school as creating a caring learning environment in which expectations are high, clear, and fair are more likely to be connected to their learning and school than those who do not.²⁴ For example, one study on increased student-teacher relationship interventions (which included weekly meetings, regular home phone calls, teacher praise, and consistent communication of high expectations), resulted in a positive effect in the grade point averages of low-income African American students.²⁵ Further, according to a recent study, student academic disengagement has the strongest relationship with disciplinary referrals across racial groups than with other preceding indicators.⁴

Highly disengaged students frequently fail to complete or turn in assignments, do not work up to their full potential, are tardy, and find school work difficult to understand.⁵ Disengaged students are less likely to aspire to higher educational goals and have lower grades.⁶ One longitudinal study finds lower academic achievement levels among students prior to suspension and significantly lower levels of academic gains throughout the three years after suspension.⁷ Projects that are designed to improve school climate need to address the underlying issues that contribute to or exacerbate disciplinary issues.

New Proposed Priority: Improving Secondary and Postsecondary Transitions

Recommendation: Include a priority for programs that support key points of transition (that often include students falling off track toward graduation), as well as efforts that focus directly on young people who are unlikely to earn a high school diploma without intensive intervention. Specifically, applications that address students' transition from middle to high school; students' transition from high school to college; and efforts to recover students who are over-age and under-credited, and disconnected youth should receive a priority.

Rationale: Many secondary school students are not prepared for college-level work by the time they graduate from high school. Furthermore, while a high school diploma was once sufficient to secure a stable job with benefits, almost two-thirds of new jobs in the fastest-growing sectors of the U.S. economy now require some postsecondary education and/or training.²⁶ According to ACT, just one in four high school graduates are ready for college-level work in the four subject areas tested.²⁷ The situation is worse for students of color. Only 5 percent of African American students and 14 percent of Latino students met all of the academic college-ready benchmarks.²⁸

College and career readiness requires focused attention at key stages of educational transitions. It also requires attention to be placed on students who are difficult to serve and often overlooked within federal education policy—students who are over-age and under-credited, and disconnected youth, the approximately 20 percent of youth, about 800,000 per year, who do not graduate from high school.²⁹ This



priority would be aligned with the Obama administration’s proposed High School Redesign program included in the President Obama’s Fiscal Year (FY) 2014 and FY 2015 budget request for ED. Further, with the recent passage of the Workforce Innovation and Opportunity Act and the legislation’s focus on serving out-of-school youth, new opportunities are presented for collaboration between the U.S. Department of Labor and ED to support these young people.

Proposed Definitions

1. High-need students

Recommendation: The definition of “high-need students” should include students who have multiple disciplinary incidents.

Rationale: There is strong evidence of a positive correlation between the number of suspensions and academic disengagement. One related study shows that of all the factors measured, academic disengagement has the strongest relationship with disciplinary referrals,³⁰ resulting in a continual cycle of disengagement, disciplinary referrals, and loss of learning time. According to the Everyone Graduates Center at Johns Hopkins University, students who were suspended once in ninth grade dropped out of high school twice as often as their peers who were not suspended.³¹ Considering the significantly increased likelihood of a student who has had multiple disciplinary incidents dropping out of school, these students should be considered “high-need students.” Grant-funded projects should be designed to address their needs and the root cause of the high rates of discipline.

Recommendation: The definition of “high-need students” should include chronically absent students.

Rationale: According to the Everyone Graduates Center at Johns Hopkins University, 5–7.5 million students are chronically absent each year, yet states and local educational agencies can easily overlook the magnitude of the attendance issues if they do not collect chronic absenteeism rates.³² There is no federal definition for chronic absenteeism; however, it is traditionally defined as a student missing 10 percent or more of the school year. According to the Everyone Graduates Center, studies suggest course performance in the ninth grade as the strongest predictor of students graduating on time, and school attendance is by far the strongest predictor of course performance. Even moderate amounts of absenteeism had strong impacts on high school graduation rates.³³ Students struggling with attendance are less likely to graduate and need targeted intervention to address the root cause of the chronic absenteeism. Projects that address the needs of chronically absent students should be supported through grant funding.

Recommendation: The definition of “high-need students” should include students with low-level literacy achievement.

Rationale: Some form of postsecondary education in the United States has become a basic requirement to attain the necessary knowledge and skills for academic and career pursuits.³⁴ Ensuring that high school graduates have advanced literacy skills—the ability to read and write proficiently using print and digital media—essential to succeed in a competitive, twenty-first-century economy and workplace is critical. Unfortunately, low-level reading and writing skills significantly constrain graduates’ options in selecting a pathway to a sustainable future. According to the National



Assessment of Educational Progress,³⁵ 25 percent of eighth-grade students and 27 percent of twelfth-grade students scored below the basic level in reading, which means they do not have even partial mastery of the appropriate grade-level knowledge and skills. The Center for Social Organization of Schools at Johns Hopkins University finds that half of incoming ninth graders in high-poverty schools read three years or more below grade level.³⁶ A broad consensus exists among researchers and education leaders that “under-developed literacy skills are the number one reason why students are retained, assigned to special education, given long-term remedial services, and why they fail to graduate from high school.”³⁷

2. High-quality teacher evaluation and support system

Recommendation (Alliance-recommended edits to ED’s proposed definition are provided in red): Define “high-quality teacher evaluation and support system” as a **fair, transparent, and rigorous** system that **(1) is aligned with the state’s teaching standards that are research-based and that provide for continuous improvement of instruction; (2) differentiates performance using at least four three performance levels; (3) uses multiple valid measures to determine performance levels, including data on student growth (as defined in this notice) as a significant factor, along with and direct observation and other measures of professional practice; (4) evaluates teachers on a regular basis; (5) provides clear and timely feedback that identifies needs and guides individual professional development; (6) is developed with teacher and principal involvement; and (7) is used to inform personnel decisions.**

Rationale: Teaching quality is recognized as the most powerful school-based factor in student learning.³⁸ Efforts by high-performing systems to improve teacher effectiveness entail close and detailed attention to improving classroom instruction.³⁹ Systems to evaluate teachers should be grounded in a shared conception of teaching, articulated through professional teaching standards such as the *Interstate Teacher Assessment and Support Consortium Model Core Teaching Standards*.⁴⁰

The primary purposes of evaluation and appraisal systems must be to (1) measure teachers on the practices that produce desirable student learning outcomes and (2) provide teachers with individual feedback that is sufficiently precise to foster specific improvements in their instruction.⁴¹ Evaluation systems should yield four performance levels to adequately differentiate teaching performance.⁴² For example, Massachusetts Task Force on the Evaluation of Teachers and Administrators, stipulates the use of four performance levels—“exemplary,” “proficient,” “needs improvement,” and “unsatisfactory”—in order to provide more useful feedback to advance the individual’s professional growth.⁴³ Results from state-administered surveys of educators’ perception of teaching and learning conditions⁴⁴ show that few educators agree that professional development is differentiated to meet the needs of individual teachers. According to the 2013 round of the *Teaching and Learning International Survey*, U.S. teachers report their professional learning has less impact on their instruction than it does for their international counterparts.⁴⁵

3. High-quality principal evaluation and support system

Recommendation (Alliance-recommended edits to ED’s proposed definition are provided in red): Define “high-quality principal evaluation and support system” as a **fair, transparent, and rigorous** system that **(1) is aligned with state leaders’ standards that are research-based and provides for continuous improvement of instruction; (2) differentiates performance using at least three four performance levels; (3) uses multiple valid measures to determine performance**



levels, including data on student growth (as defined in this notice) as a significant factor, **along with and direct observation and other measures of professional practice; (4) evaluates principals on a regular basis; (5) provides clear and timely feedback that identifies needs and guides individual professional development; (6) is developed with teacher and principal involvement; and (7) is used to inform personnel decisions.**

Rationale: Evaluation must be part of a coherent system of leadership development, based on extensive research that shows that among school-related influences on student achievement, school leadership is second in importance only to classroom instruction.⁴⁶ Evaluation and support systems should be centered on research-based standards for school leaders, such as the *Interstate School Leadership Licensure Consortium Policy Standards*⁴⁷ that emphasize instructional leadership and articulate a comprehensive range of effective leadership practices. The goal is to support principals in demonstrating effective practices and to provide them with useful, detailed feedback to advance the individual’s professional growth and effectiveness. To that end, evaluation should include direct observation of leadership practices that are known to produce desirable effects on teacher efficacy and pupil outcomes. Evaluation should meaningfully differentiate four levels of performance in order to inform individually targeted professional development and support.⁴⁸ For example, New York stipulates four performance levels for principal evaluation: “highly effective,” “effective,” “developing,” and “ineffective.”⁴⁹

4. Persistently lowest-achieving school

Recommendation: Section (a)(1)(ii) of the definition should identify a high school that has a four-year high school graduation rate as defined in 34 CFR 200.19(b) that is less than 67 percent over a number of years.

Rationale: The number of “dropout factories”—schools with an estimated Promoting Power⁵⁰ lower than 60 percent—fell from 2,007 in 2002 to 1,359 in 2012.⁵¹ While this is progress, the majority of these schools are still failing to graduate more than one-third of their students. According to U.S. High School Promoting Power data collected by the Everyone Graduates Center at John’s Hopkins University, in 2011, there were 1,424 high schools with a promoting power less than or equal to 60 percent.⁵² Although there were significantly fewer schools in 2011 than in 2002, when factoring in the schools with a promoting power between 60 and 66 percent, that number increases to 2,254 schools in 2011 and 2,947 schools in 2002 with a promoting power less than or equal to 70 percent. Projects should support schools that are still struggling to graduate more than one-third of their students. Otherwise, gains made in high school graduation rates and in reducing the number of dropout factories will stagnate.

Further, it should be clarified that the high school graduation rate trigger for identifying a low-performing school should be based on the four-year graduation rate. Using an extended-year rate for this purpose may not identify high schools with four-year graduation rates below the trigger that is set for identification, potentially preventing them from receiving needed intervention.

Recommendation: Section (a)(2)(i) of the definition should include schools identified as “focus schools” in addition to “priority schools” (the lowest achieving 5 percent of Title I schools).

Rationale: Focus schools are defined within the ESEA flexibility waiver requirements as the 10 percent of schools within a state that (1) have the largest within-school gaps between the highest-



achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, have the largest within-school gaps in the graduation rate; (2) have a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate; or (3) are Title I–participating high schools with graduation rate less than 60 percent over a number of years that is not identified as a priority school. These schools are identified due to their low performance or gaps in subgroup performance over a number of years. These schools are in need of support and should receive support from competitive grants that are designed to serve the students and schools with the greatest need.

5. Personalized learning

Recommendation (Alliance-recommended edits to ED’s proposed definition are provided in red): Define “personalized learning” as instruction **and activities that is are student-centered and aligned with rigorous college- and career-ready standards** where the pace of learning and the instructional approach are tailored to the needs, **skills, and interests** of individual learners. **The short-term learning objectives and content, as well as the pace, may all vary depending on a learner’s needs, however the long-term objectives and content shall not vary. Students have the time they need to learn at their own pace and demonstrate competency yet are provided with the support and guidance needed to progress at an overall pace that keeps them on track to meeting grade-level standards.** ~~In addition, learning activities are aligned to specific interests of each learner.~~ Data from a variety of sources (including formative assessments, student feedback, and progress in digital learning activities), along with teacher recommendations **based on student observations and data**, are often used to personalize learning. **Personalized learning includes implementing strategies for developing caring, consistent relationships between students and adults that communicate high expectations for student learning and behavior.**

Rationale: Edits reflect, in part, the definition of personalized learning used by the Bill & Melinda Gates Foundation.⁵³ According to a recent report on using innovation to prepare students for college and a career, “personalized learning ensures that students’ learning experiences—what they learn, and how, when, and where they learn it—are tailored to their individual needs, skills, and interests and enable them to take ownership of their learning. These learning environments also help students develop deep personal connections with their fellow students, their teachers, and other adults.”⁵⁴ Thus, personalized learning also ensures that “they are neither bored with assignments that are too easy nor overwhelmed by work that is too hard; instead, the goal is for students to identify the level and pace of learning that are just right for them.”⁵⁵ While the pace may be adjusted, it is critical that the standards they are required to meet remain the same. The suggested edits are intended to capture these goals of personalized learning.

New Proposed Definitions

1. Early college high school

Recommendation: Define an “early college high school” as a high school with a formal partnership between at least one local educational agency and at least one institution of higher education that allows participants, who are primarily from low-income families as measured under section 1113 of the Elementary and Secondary Education Act of 1965, to simultaneously complete requirements toward earning a regular high school diploma (as defined in section



200.19(b)(1)(iv) of title 34, Code of Federal Regulations, as such section was in effect on November 28, 2008) and earn not less than twelve transferable credits as part of an organized course of study toward a postsecondary degree or credential at no cost to the participant or participant's family.

Rationale: If ED includes projects that support early college high schools in Proposed Priority 5, it is important that there be a strong description of required criteria for those schools. The proposed definition included here was written by the Alliance and Jobs for the Future in consultation with a group of early college high school advocates.

2. Dual enrollment

Recommendation: Define “dual enrollment” as a course provided by an institution of higher education through which a student who has not graduated from high school with a regular high school diploma (as defined in section 200.19(b)(1)(iv) of title 34, Code of Federal Regulations, as such section was in effect on November 28, 2008) is able to earn postsecondary credit.

Rationale: If ED includes projects that support dual enrollment programs in Proposed Priority 5, it is important that there be a strong description of required criteria for those programs. The proposed definition included here was written by the Alliance and Jobs for the Future in consultation with a group of dual enrollment advocates.

3. Ongoing feedback process

Recommendation: Define “ongoing feedback process” as a process between institutions of higher education and local educational agencies that includes the sharing of academic outcome data, including the disaggregation of such data by student subgroups described in section 1111(b)(2)(C)(v)(II) of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 6311(b)(2)(C)(v)(II)), from the institution to the local educational agency, on the remediation needs of incoming students and subsequent use of that data by the local educational agency to strengthen instruction and reduce the need for postsecondary remediation.

Rationale: If ED includes projects that support an ongoing feedback process in Proposed Priority 5, it is important that there be a strong description of required criteria for that process. This proposed definition would support the development and implementation of an ongoing feedback process between institutions of higher education and local educational agencies to strengthen instruction and reduce the need for postsecondary remediation.



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