

January 21, 2016

Ms. Deborah Spitz
U.S. Department of Education
400 Maryland Ave. SW
Washington DC 20202

Re: Request for Information ED-2015-OESE-0130
Implementing Programs under Title I of the Elementary and Secondary Education Act

Dear Ms. Spitz,

We, the undersigned organizations, submit this response to the Secretary's Request for Information regarding implementing programs under Title I of the Elementary and Secondary Education Act (Docket ED-2015-OESE-0130). We appreciate the opportunity to provide input at this initial stage of the regulatory process and look forward to continued engagement as the U.S. Department of Education (USED) leads this process of providing regulations, guidance and other support to the field in the implementation of the Every Student Succeeds Act (ESSA).

We submit this letter of information as a group of organizations that are deeply committed to ensuring that education systems are designed to make certain that each student has the opportunity to develop the full range of knowledge and skills necessary for success in college, careers, and life. These "deeper learning" outcomes include mastering core academic content, thinking critically and solving complex problems, working collaboratively, communicating effectively, and being self-directed in one's learning and having a strong academic mindset. These critical outcomes of deeper learning are not new in education, but rather are already a priority for many accomplished and highly effective teachers and leaders and high-performing schools and are essential to ensuring that all students have equal opportunity for a high quality education.

Through ESSA implementation, USED has the opportunity to support state and local innovation and to promote equity in opportunities for deeper learning. It is in this spirit that we offer the following recommendations regarding USED priorities for regulations and guidance:

- 1. Alignment:** One of the most important principles in ESSA is that it anchors federal law in state standards and expectations aligned with college and career readiness, specifically by naming entrance requirements for credit-bearing coursework in public higher education and state career and technical education standards. We urge the Department to make clear that its interpretation and implementation of ESSA will rely on the demonstrable alignment of state and local actions to this larger goal – including, for example, with regard to high-quality assessments, accountability indicators, school improvement, and professional development, as well as in federal competitive grants.
- 2. Accountability:** Under ESSA, each state must develop new, revised systems of accountability based on multiple measures that are meaningfully aligned to the goal of college- and career-readiness. ESSA regulations should clarify that states have the flexibility to utilize accountability dashboards, not just indexes, in order to promote transparency, support the continuous improvement of all schools, and allow states to more effectively measure deeper learning. ESSA regulations should also clarify that states may incorporate measures for diagnostic purposes, in

addition to those they may use for identification purposes, to illuminate the root causes of student performance and support appropriate actions to improve performance.

3. **Assessment:** USED should ensure states implement high quality systems of assessments that measure the full range of challenging state academic standards, including higher order thinking skills. For example,

- USED should define the requirements for high quality assessments as assessments that measure critical thinking, complex problem solving, and depth of knowledge skills, consistent with the criteria USED has already published for assessment peer reviews.
- USED should clarify how portfolios, projects, or extended performance tasks can be incorporated into state assessment systems while complying with the statutory requirement for states to implement the “same” statewide assessment. As is true for standardized tests that are adaptive or use multiple forms, the “same” assessments should be defined as those that measure the same standards in ways that can be evaluated using common criteria to determine levels of performance.
- USED should prioritize the measurement of deeper learning skills in the 7-state assessment and accountability pilot. Further, USED should clarify that these innovative assessment pilots can be phased in over time rather than being fully operational during the first year of the pilot.
- USED should regulate that state assessment audits be designed to help states and districts not only reduce assessment burden but also build high-quality *systems* of assessment. Such systems can more effectively measure the full range of deeper learning knowledge and skills and reduce burden by eliminating assessments that are low-quality, duplicative, or misaligned with college-and career-ready expectations. To assure that higher order skills can be appropriately measured, calculations of time spent on testing should exempt the time spent on in-depth performance tasks and portfolios, which are typically embedded in the curriculum and part of the instructional process.

Finally, achieving deeper learning outcomes for all students will require fundamental shifts in teaching and learning. These cannot be achieved by a top-down compliance regime. Rather, they will require the development of true learning systems at all levels that can promote innovation, evaluation, and continuous improvement. We urge USED to prioritize periodic review and improvement (such as in state and local plans) to leave ample room for state and local innovation while also ensuring equity in opportunity and outcomes.

We thank you for your consideration of these priorities in implementing ESSA.

Sincerely,

Alliance for Excellent Education
Asia Society Center for Global Education
Buck Institute for Education
Californians for Justice
Career Ladders Project

ConnectEd: The California Center for College and Career
CRESST, University of California, Los Angeles
EDGE Consulting Partners
EducationCounsel LLC
EL Education
Envision Education
Friday Institute for Educational Innovation at North Carolina State University
Generation Citizen
Getting Smart
Internationals Network for Public Schools
Jobs for the Future
Learning Policy Institute
Los Angeles Area Chamber of Commerce
National Commission on Teaching and America's Future
National Public Education Support Fund
New Tech Network