



CIVIC
ENTERPRISES



January 21, 2016

Deborah Spitz
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Ms. Spitz:

The Alliance for Excellent Education, America's Promise Alliance, Civic Enterprises, and the Everyone Graduates Center at Johns Hopkins University's School of Education are the four organizations leading the GradNation campaign to raise the national high school graduation rate to 90 percent by 2020. Thanks in large part to federal policy from the U.S. Department of Education (ED) with support from educators, families, state and community leaders and organizations, and the business community, the national high school graduation rate has reached an all-time high of 82.3 percent for 2014. To continue this progress, we urge ED to maintain strong support and accountability for graduation rates through regulations of the Every Student Succeeds Act (ESSA).

Without strong regulations to support increasing the high school graduation rate, the GradNation goal may not be met. Despite a record high school graduation rate, for the first time in four years, the country is not on track to reach the national goal of a 90 percent on-time high school graduation rate by 2020, missing it by just a few tenths of a percentage point. And while there have been significant gains in student subgroup performance, the nation continues to suffer from gaps in graduation rates between students of color, students from low-income families, students with disabilities, English language learners, and their peers.

To ensure a strong focus on high school graduation rates through ESSA regulations, we offer the below recommendations for (1) low-graduation-rate high schools; (2) subgroup accountability for graduation rates; and (3) graduation rates within accountability systems.

- 1. Require states to use the four-year adjusted cohort graduation rate to identify low-graduation-rate high schools.** ESSA requires action to improve high schools that fail to graduate one-third or more of students. The statute, however, does not specifically require states to use the four-year adjusted cohort rate to identify these high schools. Alternatively, states may raise the threshold for identification of low-graduation-rate schools above 67 percent and must be required to do so if they use an extended-year graduation rate.

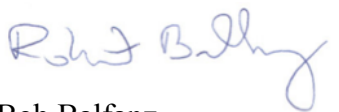
2. **Set parameters around the definition of “consistently underperforming” subgroups to ensure that state accountability systems do not mask the high school graduation rates of traditionally underserved students.** ESSA requires evidence-based, targeted intervention in schools with “consistently underperforming” subgroups. Under waivers issued by ED from No Child Left Behind (NCLB), fourteen states and territories had either no accountability for the graduation rates of student subgroups or such minimal accountability that a low graduation rate among a single subgroup would not lead to an intervention.¹ Unless parameters are set, this issue is likely to persist.
3. **Define “substantial weight” so that graduation rates carry sufficient weight within state accountability systems to trigger the implementation of meaningful, locally determined interventions in high schools with low graduation rates.** ESSA requires graduation rates and other academic indicators to carry “substantial weight” in state accountability systems. Under NCLB waivers, eleven states include graduation rates for less than 25 percent of the overall state index used for accountability purposes.²

The nation has made tremendous gains in high school graduation rates over the past decade and ESSA preserves several policies critical to these gains, including the common calculation of graduation rates, the disaggregation of data by student subgroups to help identify gaps, and graduation rate accountability. ESSA also focuses on low-graduation-rate high schools where one-third or more of students do not graduate.

These policies will be more successful if regulation and guidance issued by ED clarifies and strengthens their implementation. We believe the three recommendations provided above will help to ensure that the nation reaches the GradNation goal of a 90 percent high school graduation rate by 2020.

Thank you for your consideration.

Sincerely,



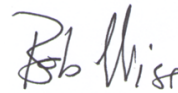
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¹ Alliance for Excellent Education unpublished update to *The Effect of ESEA Waiver Plans on High School Graduation Rate Accountability* (Washington, DC: Author, 2013).

² Ibid.