



CIVIC
ENTERPRISES



April 7, 2017

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

Dear Secretary DeVos:

The Alliance for Excellent Education, America's Promise Alliance, Civic Enterprises, and the Everyone Graduates Center, the four organizations leading the GradNation campaign to raise the national high school graduation rate to 90 percent by 2020, write to welcome you to the U.S. Department of Education (ED) and offer our assistance.

As you know, for over a decade, raising the nation's high school graduation rate and preparing students for postsecondary education and the workforce has been a bipartisan priority of governors, mayors, President George W. Bush and President Barack Obama, and leaders in the U.S. Congress. Thanks to the diligent work of educators and communities at the state and local levels, the nation reached the highest high school graduation rate on record of 83.2 percent in 2015, up from 71 percent in 2001. Over this period, 2.8 million more students have graduated rather than dropped out, with significant implications to them, the economy, and society.

These efforts have been spurred and reinforced by federal education policy promulgated on a bipartisan basis, ranging from the 2008 regulation issued by the Bush administration on graduation rate accountability to the 2011 policy of the Obama administration implementing comprehensive reform in high schools with a graduation rate below 60 percent. Yet significant graduation rate gaps remain among various student subgroups and progress must accelerate over the next five years if the 90 percent goal is to be met equitably.

As your administration implements the Every Student Succeeds Act (ESSA), we ask you to pursue the following policies that support local efforts as the nation continues toward a 90 percent high school graduation rate for all students, including those traditionally underserved.

1. Ensure high schools with a four-year adjusted cohort graduation rate (ACGR) at or below 67 percent receive comprehensive support and intervention.

ESSA requires all high schools that fail to graduate one-third or more of their students to be identified for comprehensive intervention [§1111(c)(4)(D)(i)(II)]. The statute also includes a specific definition of the graduation rate [§8101(23) and §8101(25)] that is consistent with regulations promulgated by the Bush administration in 2008. It is critical that states identify low graduation rate high schools using the accurate four-year ACGR; otherwise, many students will not receive assistance they need to succeed. For example, if a state identifies high schools where one-third of twelfth graders fail to graduate from high school instead of using the four-year ACGR defined in the statute, high schools with large numbers of students who dropped out in grades 9, 10, and 11 will not be identified for support.

Prior to the Bush regulation of 2008, many states used inaccurate graduation rate calculations that masked low performance.¹ To ensure that low graduation rate high schools are appropriately identified, it is important that ED ensures states use the accurate four-year ACGR to identify and support high schools.

2. Ensure intervention when traditionally underserved students have low graduation rates.

Underserved students should not be required to fail on multiple indicators before being identified for targeted support. ED should clarify this point to ensure struggling students receive assistance when needed.

Specifically, ESSA requires evidence-based, targeted intervention in schools with a consistently underperforming subgroup based on all indicators in the state accountability system [§1111(c)(4)(C)(iii)]. It is important for ED to clarify that states must review performance on all indicators in the state accountability system; however, students need not fail on all indicators to be identified for support. Rather, identification for targeted intervention is permitted if a subgroup does not meet or is not on target to meet a state-set goal or interim measure of progress on a single indicator such as a low graduation rate.

This clarification is critical because data² suggests that low subgroup performance will be masked if performance on multiple indicators is combined to identify consistently underperforming students. Many high schools have high proficiency rates but low graduation rates. Many other high schools have high graduation rates but low proficiency rates. For example:

- In Virginia, there are fifty-four high schools where reading proficiency is above 80 percent for African American students, but the graduation rate for this group of students is at 60 percent or below.
- In Washington state, there are twenty high schools with a graduation rate at 80 percent or above for students with disabilities, but the reading proficiency rate for this group of students is at 50 percent or below.

3. Ensure all high schools, including alternative, charter, and virtual schools, are included in state accountability and improvement systems.

The 2016 *Building a Grad Nation* report found that alternative, charter, and virtual schools comprise only 10 percent of high schools nationwide, but they make up more than 50 percent of high schools with graduation rates at or below 67 percent.³ ESSA allows schools that predominantly serve students who have dropped out of high school or are significantly off track to graduation to implement differentiated improvement activities, recognizing that some high schools serving these special populations may have lower graduation rates than regular high schools but are nonetheless effective educational institutions.

It is important that this flexibility not become a loophole. ED can ensure this by clarifying that *all* high schools with a graduation rate at or below 67 percent must be included in state accountability and improvement systems by requiring states to describe within their ESSA plans (1) the circumstances in which they would utilize this flexibility, and (2) the types of interventions that may be implemented under these circumstances.

Strengthening high school graduation rates is primarily a state and local responsibility. There is, however, a limited but crucial role for the federal government in making sure that traditionally underserved students receive the support they need. The GradNation campaign is eager to work with you and your team to maintain and accelerate progress in raising high school graduation rates.

Sincerely,



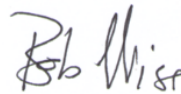
Bob Balfanz
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John Bridgeland
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John Gomperts
President and Chief Executive Officer
America's Promise Alliance



Bob Wise
President
Alliance for Excellent Education

¹ U.S. Government Accountability Office, *No Child Left Behind Act: Education Could Do More to Help States Better Define Graduation Rates and Improve Knowledge About Intervention Strategies*, GAO-05-879 (Washington, DC: Author, September 2005), <http://www.gao.gov/new.items/d05879.pdf> (accessed March 17, 2017).

² Unpublished analysis of state accountability data conducted by the Alliance for Excellent Education, School Year 2013–14.

³ J. L. DePaoli, J. M. Bridgeland, and R. Balfanz, *Building a Grad Nation: Progress and Challenge in Raising High School Graduation Rates* (Washington, DC: Civic Enterprises, Everyone Graduates Center at the School of Education at Johns Hopkins University, America's Promise Alliance, and Alliance for Excellent Education, 2016), http://www.gradnation.org/sites/default/files/civic_2016_full_report_FNL2-2_0.pdf (accessed July 28, 2016).