

June 8, 2012

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

Re: Race to the Top District Competition

Dear Secretary Duncan:

On behalf of College Summit, the nation's largest provider of college going culture and a service provider to 170 high schools in 13 states, we write to comment on the Department of Education's proposed criteria for the Race to the Top District (RTT-D) Competition. We applaud the Department for emphasizing college readiness in the latest round of the RTT competition by including college enrollment rates (CER) as one of the measurable goals identified in the "Vision" section of the RTT-D proposal. As you work to finalize the requirements of the program, we offer three recommendations:

- 1) In addition to CER, Districts and schools should be asked to set goals for improvements in their credit accumulations rate (CAR), as states were in the first round of RTT;
- 2) CER and CER should be added to the performance measures section of the application;
- 3) There should be an additional competitive preference within the competition for applicants that outline a detailed plan for assisting students with the transition from high school to college.

Recommendation 1: Setting a goal to improve persistence or credit accumulation

Setting postsecondary outcomes as the focus of the nation's high schools is the single most important shift to accelerate college access and success. As outlined in our 2011 White Paper, [Seizing the Measurement Moment](#), "In order to improve college students' readiness, high schools need to know what is working, and what is not. Yet, educators rarely have access to that information....In a 2010 survey conducted by the professional services organization Deloitte, fully 92 percent of high school educators said that having data on students' academic performance in college was critical for evaluating the effectiveness of high school curriculum and instruction. Moreover, 83 percent said that having that data would help them decide which subjects to improve. By contrast, only 13 percent of high school educators said they actually received information from school-wide reports; to the extent educators received any feedback on student performance, it was anecdotal and from former students or parents."

Inspired in part by the Department's efforts in the NCLB waiver process and earlier rounds of RTT, states are making progress in their public reporting of enrollment and persistence. Fifty

states have already committed to publishing college enrollment and credit accumulation data in 2012. Forty-eight states have the technical capacity to measure postsecondary outcomes, and 30 states already issue high school feedback reports. Just this week, Colorado became the latest state to embrace the importance of public reporting on these issues, enacting a new law that will result in publicly reported CER and academic achievement, disaggregated by school, district, and other important characteristics. It is essential that schools begin referencing the data as they set goals and outline reform measures. Even in states where the data is not yet readily available, goal setting should include a consideration of student performance once students enroll in college, not simply graduation and college enrollment. Accordingly, the Vision section should include credit accumulation goals in addition to CER.

Recommendation 2: CER and CAR should be added to the performance measures section of the application

Once in college, low-income students are failing at alarming rates: even though they appeared college-ready at admission time, too many were unprepared for the rigor of college-level work. As a result, ensuring actual college readiness has become the primary goal of K-12 education. In line with that goal, RTT-D's absolute priority 1 includes an expectation that an LEA "increase the rates at which students graduate from high school prepared for college and careers." There is no better indicator of whether schools are graduating students that are actually prepared for college than to track and evaluate student performance in the post-secondary setting. For the reasons noted in Recommendation 1, and based on our experience raising enrollment and achievement among graduates of low-income high schools, we recommend that applications describe the extent to which the applicant has established annual ambitious yet achievable annual targets for CER and CAR.

Recommendation 3: A competitive preference for applicants that outline a detailed plan for assisting students with the transition from high school to college In order to further the Department's objectives for individualization and college readiness, we recommend the RTT-D program include a competitive preference for applicants that outline a detailed plan for assisting students with the transition from high school to college. Applications should include a plan for how a district will:

- a. support a college-going culture through setting school-level goals for college enrollment and persistence,
- b. ensure all students create postsecondary plans, beginning in 9th grade
- c. provide individualized coaching by staff, volunteers, and other student peers;
- d. provide students with support for the college application and financial aid processes through a postsecondary planning course or expanded counseling programs;
- e. use postsecondary performance and remediation data to strengthen high school instruction; and
- f. provide professional development to educators on effective practices in supporting the transition between high school and postsecondary education.

The RTT-D program focuses on two powerful instruments of educational change: data and individualization. We applaud the Department for focusing on those two important priorities, and we encourage you to further embed those priorities in the performance measures and competitive preference sections of Race to the Top.

Sincerely,
J.B. Schramm
CEO and Founder