

November 6, 2009



Office of Innovation and Improvement
Attention: Investing in Innovation Comments
U.S. Department of Education
400 Maryland Avenue, SW
Room 4W321
Washington, D.C. 20202

Re: Investing in Innovation Comments, Docket ID ED-2009-OII-0012

To Whom It May Concern:

This letter provides comments and recommendations in response to the notice of proposed priorities published in the *Federal Register* of October 9, 2009 regarding the U.S. Department of Education's Investing in Innovation (i3) Fund under the American Recovery and Reinvestment Act (ARRA). These comments and recommendations are submitted by College Summit,¹ which applauds the goals of the Fund and provides these comments to strengthen the methods used to achieve these goals.

America's competitive position in the global economy requires increasing our college attainment rate, and high schools have an increasingly significant role to play in facilitating postsecondary success. Recognizing this role, President Obama has challenged our nation to achieve the highest percentage of college graduates in the world by 2020, and has called on all students to complete at least one year of postsecondary education.²

The American Recovery and Reinvestment Act emphasizes the importance of postsecondary attainment for achieving economic growth.³ i3, too, recognizes this core goal of the Administration by establishing "College Access and Success" as Competitive Priority 6. Yet, there is a critical gap in the design of i3 which risks undercutting the postsecondary gains our nation requires and that ARRA sets forth to achieve: **While i3 calls acknowledges College Access and Success as a competitive priority, the fund does not go far enough in setting postsecondary attainment as a goal of our high schools.** To strengthen this essential message, several changes must be made throughout the i3 Fund's proposed guidelines.

First, and most importantly, the purpose of the program itself must be amended to recognize the necessity of postsecondary education in line with the President's vision. Reorienting the Fund in this way will encourage educators and school leaders to cease viewing high school as the end-game that it no longer is. ***Postsecondary attainment should be included in the definition of student achievement so that the purpose of the fund aligns with consensus national expectations.***

Second, and along these lines, ***Competitive Preference Priority 6 should be upgraded to be an Absolute Priority.*** Doing so would not negate the supremacy of the original four Absolute

Priorities, but would rather recognize that postsecondary education is indeed coequal with these priorities in a 21st-Century marketplace.

Finally, the ***assessments described in the i3 Fund should be modified such that they do not completely draw from the current Elementary and Secondary Education Act, and instead draw from the above-described definition of student achievement.*** Not doing this would entrench the existing standards of accountability articulated in the current ESEA. Recent discussion regarding ESEA, including comments made by Education Secretary Duncan himself, indicate a consensus that the focus on tests has not proved useful in the effort to fully reform and revitalize the education system.⁴ Education programming must shift to a focus on enabling students to engage in the type of higher-level thinking that will lead them to college and career success; using ESEA assessments in i3 will not effectively allow this shift to occur.

College Summit commends the Administration and Congress for their leadership in making the connection between education and economic health and the connection between high school education and postsecondary attainment. We offer broad support to the i3 Fund and its focus on innovation. The specific recommendations attached in the Appendix below are intended to help strengthen the extent to which the national consensus on the importance of postsecondary attainment is reflected in the i3 Fund as an essential approach to driving student success and American economic recovery.

Kind regards,

J.B. Schramm
Founder and CEO
College Summit

APPENDIX

PART A: HIGH-PRIORITY RECOMMENDATIONS TO STRENGTHEN PROPOSED REQUIREMENTS:

Purpose of Program

The Notice states that the purpose of the i3 program is to “expand the implementation of, and investment in, innovative practices that are demonstrated to have an impact on improving student achievement or student growth . . . for high-need students.”

Recommendation 1

The greatest step that can be taken to create a competitive American workforce and strengthen the economic health of this nation is to ensure that all American high school students graduate readily able to enroll in postsecondary training. Therefore, student achievement must be considered in relation to the extent that such achievement advances college enrollment and proficiency. ***College Summit thus recommends that the definition of “student achievement” be amended to include an explicit reference to college enrollment and proficiency (as defined in previous contexts by the Administration).*** Specifically, a third sub-part (c) should be added, which states “For graduating high school students, the extent to which such students enroll in an institution of higher education, including both two- and four-year colleges, as well as trade and vocational schools, and complete one year’s worth of college credit within two years.”

Competitive Preference Priority 6 – Innovations that Support College Access and Success

As stated above, there is a strong connection between the state of a nation’s education system and the economic health of that nation. A competitive workforce is a well-educated workforce. Therefore, to have a robustly skilled workforce, any attempt to improve the education system must focus on postsecondary education as the end-goal of student achievement.

Recommendation 2

College Summit recommends that, in accordance with the right reserved to do so, the Department should ***convert Competitive Preference Priority 6 into an Absolute Priority.*** Doing so would further integrate our education system into one which shepherds students from elementary, secondary, and postsecondary education to the workforce.

Recommendation 3

As currently written, Competitive Preference Priority 6 speaks generally of college access and preparedness. To be consistent with the fund’s goal of funding “what works,” it is important that this section refer to student success outcomes. ***College Summit therefore recommends that the language be amended to include explicit references to programs that “drive college enrollment rates” and programs that “drive college proficiency rates.”***⁵

Eligibility Requirement (2)

Requirement (2) states that an applicant must “have exceeded the State’s annual measurable objectives consistent with section 1111(b)(2) of the ESEA for two or more consecutive years or have demonstrated success in significantly increasing student achievement for all groups of students described in that section through another measure, such as measures described in section 1111(c)(2) of the ESEA...” This requirement once again illustrates the importance of adopting a more expansive definition of “student achievement” that is aligned with the recent movement toward higher, more uniform standards.

Measuring student achievement on the basis of the objectives that states created in accordance with ESEA is problematic because it enshrines goals set years ago that do not align with the Administration’s current goals, such as having the highest proportion of college graduates by 2020 and ensuring that all Americans attain at least one year of postsecondary.⁶ At a minimum, the guidelines should add *success outcomes* to the already included performance measures which largely concern *learning outcomes*. This would allow organizations to demonstrate program effectiveness by showing the extent to which students: sat for SAT exams; enrolled in postsecondary education; attained postsecondary proficiency; and others.

Recommendation 4

College Summit recommends that ***the guidelines adopt the revised definition of “student achievement” mentioned above***, including an explicit reference to postsecondary attainment as one measure of student achievement.

Recommendation 5

Furthermore, the language in Requirement (2) is currently unclear as to whether a more expansive definition of “student achievement” is already in place. This language currently recognizes that “another measure” may be used, “such as measures described in section 1111(c)(2) of the ESEA...” The quoted phrase currently seems to suggest that the measures described in section 1111(c)(2) of ESEA are only a few of many possible measures. College Summit recommends that the Department ***clarify that this is in fact what was meant by this language***, thereby permitting applicants to demonstrate success through other measures.

PART B: OTHER RECOMMENDATIONS TO STRENGTHEN PROPOSED APPLICATION REQUIREMENTS

Absolute Priority 1 – Innovations that Support Effective Teachers and School Leaders

College Summit commends the focus on the importance of teacher quality. One of the ways to improve teacher and student leader effectiveness is to help students understand the connection between their college and career goals and their academic work.⁷ Therefore, an attempt to improve teacher quality should extend to also improving teachers’ abilities to help students make this connection.

Recommendation 6

College Summit recommends that ***the definition of “highly effective teacher” be amended*** to include teachers who are “trained in helping students make the connection between the high school curriculum and postsecondary enrollment and readiness.”

Absolute Priority 2 - Innovations that Improve the Use of Data

To use data effectively, the correct type of data must be gathered, and the individuals who will be most affected by the data must be trained in how to interpret such data. One of the most common complaints among educators is that they have too much data, and too little support to make the data useful in the classroom.

Recommendation 7

College Summit recommends that this priority be amended to read as follows: “Department would provide funding to support strategies, practices, or programs that encourage and ***facilitate the evaluation, analysis, and use of student achievement, student growth, and college enrollment data by educators***, families, and other stakeholders, and train stakeholders in the interpretation and application of such data, in order to inform decision-making.”

Absolute Priority 4 – Innovations that Turn Around Persistently Low-Performing Schools

One of the targeted approaches listed in the proposed priority is “integrating student supports to address non-academic barriers to student achievement.”

Recommendation 8

College Summit recommends that a clarifying definition of “non-academic barriers to student achievement” be produced. We recognize that a variety of non-academic barriers exist that impact a student’s ability to achieve. One such barrier for first generation college-goers is their lack of information on college application and access, which prevents them from furthering their education. We defer to the Department’s judgment in producing a comprehensive list of non-academic barriers, but suggest that, at a minimum, ***a definition of “non-academic barriers” should include the phrase “informational, socioeconomic, and cultural barriers to a student’s postsecondary attainment.”***

Note about Eligibility for an Entity that Includes a Nonprofit Organization

This note, which addresses the ability of nonprofits to meet the application requirements, states that “the nonprofit organization would have to demonstrate that it has a record of meeting those requirements through the assistance it has provided to one or more LEAs in the past.” As it currently stands, this note is unclear as to the burden of proof necessary to fulfill this requirement.

Recommendation 9

College Summit recommends that different eligibility requirements be used for nonprofits and for LEAs. Eligibility Requirement (2), which incorporates the assessment methods created under

ESEA, can be very problematic for nonprofits. As articulated above, it is unwise to further entrench ESEA assessment methods. Furthermore, measuring nonprofits by such standards could create a bias toward funding LEAs rather than nonprofits, as it can be difficult for a nonprofit to prove a causal relationship between its interventions and progress made in these assessments. Instead, ***a nonprofit should be required to “demonstrate that it has a record of driving student achievement and student growth through the assistance it has provided to one or more LEAs in the past,” using the definition of “student achievement” recommended above.***

Selection Criteria – Solicited Commentary

Within the notice, there was a direct solicitation of comments on “whether there are other methods of determining cost-effectiveness” that would be “more informative” or “less burdensome” than providing estimated start-up and operating costs for reaching the total number of students proposed to be served by the project, as well as to reach certain numbers milestones, such as 100,000, 250,000, 500,000, and 1,000,000 students.

Recommendation 10

Cost-effectiveness measures should require the reporting of “total cost per student” and “total cost per student per year”. Without this distinction, the Department will not be able to see the actual cost of interventions. For example, two different initiatives could both cost \$200 per student per year. Yet one could require 12 years of intervention to get the desired result, a \$2,400 total cost per student. The other could require only one year of intervention, and achieve the desired outcome for only \$200.

¹ A national non-profit founded in 1993, College Summit partners with school districts and states to increase their college-going rates by fostering a high school culture where college-going is the expectation, not the exception. College Summit is the largest provider of college-going culture in the United States, currently reaching 28,000 students at 170 schools in 12 states and the District of Columbia. College Summit schools have raised their enrollment rates an average of 15 percent over their baselines, and the second-year college persistence of College Summit alumni is 67 percent. College Summit helps its partners use a systemic, data-driven approach to increasing college-going rates, including professional development services, peer leadership training, and a postsecondary planning curriculum.

² Earlier this year, President Obama addressed Congress: “I ask every American to commit to at least one year or more of higher education or career training. This can be community college or a four-year school; vocational training or an apprenticeship. But whatever the training may be, every American will need to get more than a high school diploma.” President Barack Obama, Address to Joint Session of Congress (Feb. 24, 2009), available at http://www.whitehouse.gov/the_press_office/remarks-of-president-barack-obama-address-to-joint-session-of-congress/.

³ Recovery.gov, The Act, http://www.recovery.gov/About/Pages/The_Act.aspx (last visited Nov. 5, 2009).

⁴ In a recent speech on the upcoming reauthorization of ESEA, Secretary Duncan spoke of the 2002 “No Child Left Behind” authorization: “The biggest problem with NCLB is that it doesn’t encourage high learning standards. In fact, it inadvertently encourages states to lower them. The net effect is that we are lying to children and parents by telling kids they are succeeding when, in fact, they are not.” Secretary of Education Arne Duncan, Reauthorization of ESEA: Why We Can’t Wait (Sept. 24, 2009), available at <http://www.ed.gov/news/speeches/2009/09/09242009.html>.

⁵ College proficiency rate is defined as the rate at which high school graduates complete one year's worth of college course credits in two years, without remediation.

⁶ President Obama, *supra* note 2.

⁷ What Works Clearinghouse, Helping Students Navigate the Path to College: What High Schools Can Do 15 (2009) available at http://ies.ed.gov/ncee/wwc/pdf/practiceguides/higher_ed_pg_091509.pdf.