



**Comments/Recommendations in response to Department of Education Proposed Race to the Top Fund Rules in Federal Register Document ED-2009-OESE-0006.**

*Submitted by:  
Center for Law & Social Policy and Campaign for Youth*

Thank you for the opportunity to provide feedback on the proposed rules for the Race to The Top Fund. These critical resources through the American Recovery and Reinvestment Act of 2009 (ARRA) will pave the way for sustainable reforms that transform the educational experience for American students. We commend the U.S. Department of Education for its unprecedented stand on education reform as a central component to our nation's economic renewal and for its thoughtful work on the Race to the Top Fund. In particular, we support the following:

- Inclusion of the workforce system in the P-20 Coordination and Vertical Alignment Priority. In a 21<sup>st</sup> Century economy, education preparedness and job readiness are inextricable. This partnership will add relevance to classroom instruction and allow connections to work-based learning, internships, and other school-work partnership models. As we prepare youth for existing and emerging industries, workforce competencies and skills help ensure students are prepared for transition points in their educational careers and increase the likelihood of graduation from high school.<sup>i</sup>
- Priority given to school level conditions for reform, which is key. Reform is most evident when changes are effectively implemented at the local level, and where student learning can be directly and immediately influenced. Changes that have demonstrated positive impacts on students learning include flexibility in credit attainment by offering competency-based and applied learning approaches<sup>ii</sup>, collaborating with community-based partners to expand learning time through extended day and out-of-school time programming<sup>iii</sup>, and the provision of comprehensive services, i.e. family-related, health, mental health, and transportation<sup>iv</sup>
- Particular attention paid to high-need LEAs, high poverty schools, and achievement gaps. Fundamental systems change cannot occur without directly addressing the resource deficiencies of high poverty schools/districts and the abysmal achievement gaps among black, white and Hispanic students. High school graduation rates are particularly inconsistent among racial groups. Nearly three out of ten Hispanics are dropouts (27.5%)

and more than one in five blacks have dropped out of school (21%) compared with 12.2% of whites.<sup>v</sup>

- Equitable distribution of effective teachers and principals among all schools. One of the most important indicators of student success is effective teachers and leadership. Low-performing and high-poverty schools are usually the most under-resourced in terms of human capital. These schools tend to be staffed by the least-experienced teachers and have extremely high turnover rates. Districts must pay attention to equitable distribution of their staff to ensure quality teaching and leadership in ALL school settings.

We are, however, quite concerned that the Race to the Top Fund does not include targeted investments for dropout recovery or provide state education agencies (SEAs) and local education agencies (LEAs) with strategic direction to implement innovative models to reengage youth who have dropped out. On March 10, 2009, President Obama expressed support for such an education agenda, identifying investments for “new efforts to give dropouts who want to return to school the help they need to graduate and new ways to put those young men and women who have left school back on a pathway to graduation.” Barring a strong signal of commitment to this student population at the federal level, as evidenced through U.S. DOE funding initiatives and policies, we are doubtful that SEAs and LEAs will have the human and financial capital or the incentive to consider such reforms.

Our comments relate specifically to giving increased attention to struggling students and disconnected youth. Thank you for your consideration of our recommendations. If you have any questions or need further information, please contact Rhonda Tsoi-A-Fatt at CLASP (202-906-8014 or [rtsoiafatt@clasp.org](mailto:rtsoiafatt@clasp.org)) or Kisha Bird at the Campaign for Youth (202-906-8020 or [campaignforyouth@clasp.org](mailto:campaignforyouth@clasp.org)).

## **RECOMMENDATIONS**

### **1. Require states to show demonstrated commitment to addressing the issue of re-engaging high school dropouts.**

To appropriately address this crisis we must employ national and local efforts. The recovery of high school dropouts must be a central component to any serious systemic approach to education reform. In 2007, an astounding 16 percent of 16 to 24 year olds (nearly 6.2 million people) were high school dropouts.<sup>vi</sup> Many of these young people are seeking opportunities to re-enroll into school.<sup>vii</sup> These students deserve access to high quality education and an opportunity return to school. Intentional recovery options become particularly important as SEAs and LEAs move toward meeting the requirements for calculating four -year and/or expanded year (five-year and six-year) graduation rates. Without strategic approaches that intentionally integrate reengagement efforts, districts will not serve this population

effectively. This failure will be reflected in persistently low graduation rates and a weakened community economic structure.

We recommend:

- “Comprehensive Approach to the Four Education Reform Areas” – Part I, Proposed Priority  
Require state comprehensive plans to include how they propose to reach out to youth who have disengaged from the education system, and to develop short- and long-term strategies for their reconnection.
- “Proposed Priority 3- Expansion and Adaptation of Statewide Longitudinal Data Systems”  
In addition to integrating data from “special education programs, limited English proficiency programs, early childhood programs, etc.,” this priority must support states in collecting student-level information about the points at which students exit, transfer in, transfer out, drop out, re-enroll, or complete P-16 education programs.
- “P-20 Coordination and Vertical Alignment” – Part I, Proposed Priority 4  
Revise this priority to specify re-engagement of high school dropouts and include *child welfare and juvenile/criminal justice agencies* in the partnership efforts that will “create a more seamless P-20 route” for students. While vertical alignment and coordination is indispensable to developmental learning and ensuring seamless transitions for students, horizontal alignment among all youth-serving systems (i.e. juvenile justice & child welfare) is just as significant, especially when taking into account those youth in high-need, high-poverty schools and districts. Other systems beyond education agencies have been quite successful in identifying and implementing solutions to reconnecting youth.<sup>viii</sup> Any applications considered under this priority should build on this learning.<sup>ix</sup>
- “School-Level Conditions for Reform and Innovation” Part I, Proposed Priority 5  
School-level innovations should clarify the definition of high-need students and include students who have left school prematurely and those over-aged and under-credited for on-time graduation. Revise this priority, element (v) to read “providing comprehensive services to high-need students, including those who have dropped out, are over-aged and under-credited (e.g., through local partnerships, internal staffing, and contracts with outside providers).”
- “Reform Plan Criteria” for “Overall Selection Criteria” – Part III, Section (E)(4)  
Include language that specifies re-engagement of high school dropouts. Also include language that specifies plans to work with community-based alternative programs and

other youth systems such as juvenile justice or child welfare to prevent dropout and re-engage youth who dropped out and are also being served by those systems.

- “Definitions”, Part IV

Add the following definition for “high-need students”: Young people in disadvantaged situations, including those who left secondary school without receiving a high school diploma, those at risk of not graduating with a diploma on time, runaway and homeless youth, youth in foster care and those aging out of care, formerly incarcerated and court-involved youth and young people with disabilities.

## **2. Explicitly support the use of multiple pathways and credit based on student performance rather than instructional time.**

Innovative school districts and communities have implemented instructional models that have yielded promising results for both high-performing and struggling students. Options that create flexibility for students without sacrificing rigorous learning are a key component of effective high school reform. School-work partnerships, diploma-plus programs, and dual-enrollment high school/community college programs, are examples of innovative approaches to creating multiple options that help students to graduate from high school and pursue additional educational goals. Many of these successful models are implemented in partnership with local community-based organizations with experience in educating struggling students and dropouts.

We recommend:

- “Reform Plan Criteria” for “Turning Around Struggling Schools” - Part III, Section (D)(3)

Edit these criteria to include language about expanding options for students in struggling schools by creating multiple pathways for students to complete high school graduation, such as credit recovery, awarding credit based on student performance, and dual-enrollment options. Partnerships with local community-based educational and workforce organizations may be particularly helpful in this regard.

## **3. Elevate importance of community-oriented supports for student achievement in struggling schools.**

The importance of community-based supports such as enrichment programs, family engagement activities, physical and mental health services cannot be overstated. Turning around struggling schools will require a comprehensive approach that includes all of the elements outlined in the proposal – community-based supports, new leadership, high quality

teaching staff, instructional reform, school-level autonomy, and extended learning time. Working together, each of these elements is essential to making a difference in academic outcomes for students.

We recommend:

- “Reform Plan Criteria” for “Turning Around Struggling Schools” - Part III, Section (D)(3)

Restructure criteria to place equal emphasis on inclusion of community-based supports in state applications. In this section, implementing a school transformation model that includes comprehensive instructional reform, extending learning time, community oriented supports, enrichment activities and family and community engagement is only an allowable approach if the other three approaches mentioned in this section are not possible. We recommend that implementing such a school transformation model should be one of the acceptable approaches, not just a fall back if the others are not possible.

**4. When considering charter school expansion, place priority on schools that seek to create high quality pathways for “high risk” and reconnecting youth.**

States must ensure legislation is flexible enough to allow multiple routes to achieve a high school diploma—including the expansion of charters and partnerships with community-based organizations. There is growing evidence that public charter schools allow flexibility and innovation in education that can make for a successful learning environment for students, in particular for youth who have dropped out and are seeking to reconnect to school and those who can benefit from a smaller more supported environment.<sup>x</sup> These settings provide young people in disadvantaged situations with essentials that meet their unique needs, integrating practices such as individual learning, wrap around social services, non-traditional teaching to support learning styles, and work-based skills and techniques.

Therefore, we recommend:

- “Reform Plan Criteria” for “Turning Around Struggling Schools” – Part III, Section (D)(3)

Introduce language that places priority to states that set targets for the development of public charter school options for reconnecting students.

## ENDNOTES

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- <sup>i</sup> Michael Wald and Tia Martinez, *Connected by 25: Improving the Life Chances of the Country's Most Vulnerable 14-24 Year Olds*, William and Flora Hewlett Foundation Working Paper, 2003, [http://www.ytfg.org/documents/connectedby25\\_OOS.pdf](http://www.ytfg.org/documents/connectedby25_OOS.pdf)
- <sup>ii</sup> "Diploma Plus - Sampling of Outcome and Impact Data from March 2008", Report to the Bill and Melinda Gates Foundation, <http://www.commcorp.org/diplomaplus/documents/DPoutcome-impactdata-032008.pdf>
- <sup>iii</sup> *Making the Case: A 2008 Fact Sheet on Children and Youth In Out-of-School Time*, National Institute on Out-of-School Time, Wellesley Centers for Women at Wellesley College, 2008, <http://www.niost.org/pdf/Final2008FactSheet.pdf>
- <sup>iv</sup> Martin J. Blank, Atelia Melaville and Bela P. Shah, *Making the Difference: Research and Practice in Community Schools*, May 2003, Coalition for Community Schools, Institute for Educational Leadership, <http://www.communityschools.org/CCSFullReport.pdf>
- <sup>v</sup> *Left behind in America: The Nation's Dropout Crisis*, The Center for Labor Market Studies at Northeastern University and the Alternative Schools Network in Chicago, May 2009, [http://www.clms.neu.edu/publication/documents/CLMS\\_2009\\_Dropout\\_Report.pdf](http://www.clms.neu.edu/publication/documents/CLMS_2009_Dropout_Report.pdf)
- <sup>vi</sup> *Left behind in America*
- <sup>vii</sup> John M. Bridgeland, John L. DiIulio, Jr., and Karen Burke Morison, *The Silent Epidemic: Perspectives of High School Dropouts*, Bill & Melinda Gates Foundation, 2006, <http://www.civicenterprises.net/pdfs/thesilentepidemic3-06.pdf>
- <sup>viii</sup> *YouthBuild USA's Youthful Offender Project: Project Overview*, 2007, 1-2
- <sup>ix</sup> Linda Harris, *Learning from the Youth Opportunity Experience*, Center for Law and Social Policy, 2006, 17-20.
- <sup>x</sup> Nancy Martin and Betsy Brand, *Federal, State, and Local Roles Supporting Alternative Education*, American Youth Policy Forum, June 2006, [http://www.doleta.gov/youth\\_services/pdf/AE\\_Current\\_Policy\\_and\\_Funding\\_Environment.pdf](http://www.doleta.gov/youth_services/pdf/AE_Current_Policy_and_Funding_Environment.pdf)

### ABOUT CLASP

The Center for Law and Social Policy (CLASP) is a national nonprofit that develops and advocates for policies at the federal, state, and local levels to improve the lives of low-income people.

### ABOUT CAMPAIGN FOR YOUTH

Housed at the Center for Law and Social Policy, the Campaign for Youth is an alliance of national and local youth-serving organizations who are concerned about the challenges confronting more than 5 million young people in this nation who are disconnected from education, employment and opportunity. For more information on the Campaign for Youth and the partnering organizations, please visit [www.campaignforyouth.org](http://www.campaignforyouth.org)