

STATE OF ALASKA

Department of Education & Early Development

Office of the Commissioner

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United States Senate Committee on Health, Education, Labor and Pensions
Washington, D.C., 20510-6300

Dear Senators:

The Obama administration's blueprint for reauthorizing the Elementary and Secondary Education Act promotes an important goal: graduating students ready for careers and further education and training. Alaska came to the same conclusion in its own blueprint for reform, the Alaska Education Plan, created in November 2008 by hundreds of Alaskans from all walks of life.

However, Alaska is concerned that the Obama administration's blueprint for ESEA reduces school districts' and states' freedom and authority to address their students' needs based on what state and local educators see in the classrooms, where they can adjust strategies in a timely way. The states must be treated as equal partners in finding solutions to low-performing students and schools.

The Alaska Education Plan acknowledges a need for world-class academic standards, but we also need to develop in students the attributes -- such as flexible minds, the application of knowledge, and the ability to work in teams -- that the 21st century economy requires.

Alaskans are formulating detailed recommendations to improve teacher quality; we are coordinating early learning, developing a virtual school, creating a health and safety plan, and laying the groundwork to improve our standards; we are recommending ways to remove barriers to graduation; we are expanding career and technical education, and building models for school/community partnerships.

All of Alaska's schools, whether urban or rural, face challenges and would be affected by the ESEA blueprint. Some schools are in communities with high rates of violence, substance abuse and cultural disorientation, which follow students into school. Many of our lowest-performing schools are in small, remote communities in districts that have limited technical expertise.

The four intervention models in the ESEA blueprint do not serve Alaska well. In particular, they do not recognize the unique circumstances of rural Alaska. Sixty-eight of our 500 schools statewide have fewer than 20 students. Rural schools are isolated from each other and their central office, are inaccessible by road, and are in harsh climates. Some schools are in low-income communities, and may not be served by law enforcement personnel. Some Alaska communities engage in a subsistence lifestyle, which is little understood by federal regulators.

Native village schools serve cultures that often feel disassociated from educational institutions.

Shall we close the only school in a village? Shall we fire the hard-won principal and teachers – and replace them with whom? Shall we fly in strangers to run a village’s school? Under the blueprint, the most significant and sensitive relationship between the states and their districts – that of improving struggling schools -- would have the least flexibility.

These rural communities have a history of outside forces running their educational institutions. The blueprint for ESEA would impose more of that. It is our judgment, born of experience, that we cannot help rural schools if we alienate the communities we serve.

Our state system of support for struggling schools is focused on helping districts build their capacity to use researched-based practices in curriculum, assessment, instruction, supportive learning environment, professional development, and leadership. Only by building local capacity at both the district office and community level is long-term school improvement possible.

We have added to our staff and placed on contract Alaska experts who provide on-site assistance to schools in content (academics and the arts), instruction, curriculum alignment, and leadership. We employ trained mentors for new teachers and principals. We work with school boards and superintendents to be sure the conditions are in place to implement the district’s improvement plan.

Regarding the administration’s blueprint, we also are concerned about the difficulty of creating fair and valid methods of teacher evaluation that rely heavily on student test scores. The assessments were not devised for that purpose. Many teachers do not teach in assessed subjects. Some teachers teach all subjects. Teachers vary considerably in the composition of their classes.

This element of the blueprint risks furthering the pitfalls of No Child Left Behind: invalid application of statistical information, a focus on gathering information rather than improving instruction, narrowing of the curriculum and teaching methods, and holding teachers responsible for everything that affects learning, ranging from the home to the ballot box.

The blueprint assumes either that students and schools are not influenced by outside factors, or that teachers have the capacity to undo the effects on students of conditions such as substance abuse, physical abuse, and mental illness.

On the school level, the blueprint assumes that all schools are alike and can be held accountable in the same way. That was one of the flaws of the adequate-yearly-progress system of No Child Left Behind. The blueprint’s substitute for AYP is a system of Reward and Challenge schools and identification of lowest-performing schools -- a designation that would trigger the intervention models we have concerns about.

Such a system is not flexible enough to account for special schools whose enrollments are intentionally composed of students with disabilities. In the Anchorage School District, the Whaley Center is a group of special-education schools. It includes separate special-education day schools, services in psychiatric hospitals and residential treatment centers, services to students in correctional facilities, services to preschool students at home or at preschools, and services for students after high school. The highest-performing of these students transition to less-restrictive settings. Consequently, the Whaley Center is always composed largely of low-performing students. The very attribute that gives the Whaley Center its purpose condemns it to do poorly in

a federal accountability system and face disruptive consequences.

We also are concerned that the administration's blueprint funnels an increasing amount of funds into competitive grants, leaving a lack of formula funding for program areas such as literacy, technology, and safe and healthy students.

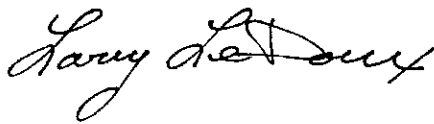
Small states, and small districts within states, are at an inherent disadvantage in applying for competitive grants, even if there is a rural or high-needs preference. At the state level, we have seen small districts decline to apply for competitive grants because of the time and expense.

Alaska's suggestions for the ESEA reauthorization are explained in detail in the attachment. In summary, we would like to see:

- Clear definitions of career-ready and college-ready
- Clarification of flexibility given to Challenge schools in Reward districts
- Clarification of what provisions apply only to Title I schools and districts
- Flexibility in intervention models and recognition of states' initiatives to improve schools
- Larger set-asides for state activities
- Formula grants and more funds for development of assessments
- Formula grants for teacher quality
- Increase the minimum amount for Title III grants for English language learners
- Formula grants for literacy programs
- Formula grants for science, technology and math programs
- Formula grants for arts, foreign languages, history and civics, financial literacy, environmental education and other subjects
- Formula grants for accelerated learning
- Formula grants for community outreach programs
- Formula grants for safety and health

Thank you for this opportunity to comment. We are ready to assist your committee in any way we can and to provide further information. Please call me at 907-465-2802.

Sincerely,



Larry LeDoux
Commissioner

Enclosure

| Renamed account for FY2011: College- and career-ready students (ESEA Title I Part A), FY2010 \$14.5 billion, FY2011 \$14.5 billion. | |
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| Comments | Blueprint Highlights |
| <p>Alaska welcomes and does not disagree with higher standards but does not want to be coerced into adopting standards just to be eligible for federal money. What is definition of college and career ready? Are they the same? Many of our standards are currently built upon the belief of preparing our students for the workforce. How is this different? Will these new standards tell us anything new about our students that we don't already know? What is the research that ties standards to an increase of student achievement? Dr. Grover Whitehurst's research seems to indicate a focus on curriculum would be a more effective way to truly impact student learning.</p> <ul style="list-style-type: none"> Our state system of support is built upon proven, research supported educational reforms- any consideration to current state initiatives in improving student achievement? Where is there a recognition of the many things that states have been doing or are currently implementing that are showing gains in student achievement? <p>This focuses mainly on the premise that adoption of common core standards is the "silver bullet" and funds are leveraged to this narrow road to achievement. States that have already limited educational resources have limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not reducing funds or further limiting their access to additional funds and flexibility.</p> | <p>ED proposes that all states adopt state-developed standards in ELA and mathematics that build toward college- and career-readiness by the time students graduate from high school, and high-quality statewide assessments aligned with these standards.</p> <p>States may either choose to upgrade their existing standards, working with their 4-year public university system to certify that mastery of the standards ensures that a student will not need to take remedial coursework...; or work with other states to create state-developed common standards that build toward college- and career-readiness.</p> |
| <p>It's unclear exactly how Reward districts will be defined and be given flexibility to implement interventions in their lowest performing schools. What if those schools in a Reward district are in the lowest 5% of the Challenge schools in the state? Will these schools have flexibility in a Reward district?</p> | <p>Every state will ensure that its [disaggregated] statewide system of accountability rewards schools and districts for progress and success, requires rigorous interventions in the lowest-performing schools and districts, and allows local flexibility to determine the appropriate improvement and support strategies for most schools.</p> |

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| <p>Several categories of Challenge schools are identified and it's unclear if this will apply only to Title I schools. It would also make sense to find the lowest 5% of the Title I served AND eligible from one pool, rather than requiring them from two separate pools where one pool of schools might be higher performing overall than the other. The Blueprint talks about the "lowest 5%", the "next 5%", and so on for different categories of Challenge schools. If we are to truly choose 5% of the lowest performing, next lowest performing, etc., we need to be able to use a combination of grad rate and low academic achievement that works for our state, not just add the schools with low grad rates to the ones with the lowest academic performance. In the current definition of our "persistently lowest achieving schools," we had 6 schools in the lowest 5% academically, but with the addition of those with a graduation rate of less than 60%, the Tier I list expanded to 24 schools. It can have the effect of diluting resources that would be needed more at other schools. Also, we should be able as a state to consider not only the number of lowest performing schools, but the size of the schools so that the lowest performing schools with the largest numbers of students that could be positively impacted would be the schools targeted for the most rigorous interventions. Finally, we need flexibility in an intervention model that allows a school to keep, train, and evaluate a principal rather than automatically requiring replacement; flexibility and support to implement our SSOS fully.</p> | <p>USED proposes the goal of all students graduating or on track to graduate from high school ready for college and a career by 2020. ... Schools, districts, and states that are successful in reaching performance targets, significantly increasing student performance for all students, closing achievement gaps, or turning around the lowest-performing schools (at the district and state level) will be recognized as Reward schools, districts and states. At the other end of the spectrum will be Challenge states, districts, and schools.</p> <p>The first category of Challenge schools will be the lowest-performing 5% of schools in each state, based on student academic achievement, student growth, and graduation rates. In these schools, states and districts will be required to implement one of four school turnaround models. Both Challenge districts and states will face additional restrictions on the use of ESEA funds and may be required to work with an outside organization to improve student academic achievement.</p> |
| <p>We support larger, more realistic state set-asides for state activities and implementation and support of schools and districts. The blueprint also implies that districts will be required to set aside a portion of their own grant to serve schools in improvement, rather than requiring the state to take the set aside from its allocation and then re-allocate as SI funds. This would streamline that process quite a bit and put the responsibility on the districts for most of their schools.</p> | <p>ED proposes to allow States and districts to reserve funds to carry out such activities as (i) supporting and complementing the adoption of rigorous standards ...; (ii) supporting the more effective use of data ...; (iii) ... capacity ... to support the effective use of technology to improve instruction; (iv) coordinating with early learning programs to improve school readiness; or (v) carrying out effective family engagement strategies. LEAs will be required to set aside funds for school interventions and intervention training.</p> |
| <p>Will it take into account the different levels of experience and education of teachers at different places on the salary schedule? Right now it's very easy to find a way to show comparability. The Title I funding formula itself is quite complex. Unsure how any proposed changes would affect Alaska districts or schools but many rural sites have limited capacity to complete an additional report or data collection.</p> | <p>Districts will be required to ensure that their high-poverty schools receive state and local funding levels (for personnel and relevant nonpersonnel expenditures) comparable to those received by their low-poverty schools.</p> |

| Comments | Blueprint Highlights |
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| <p>Assessing achievement (ESEA VI-A-1): FY2010 \$410 million, FY2011 requested \$450 million.</p> <p>EED would support the formula grants for assessment development and would support an increase in those funds. As stated in the April 27 letter to Secretary Duncan signed by rural state chiefs: "Our rural states, like all of America, have been hit hard by this recession. Our state agencies' budgets were already small, but with recent further cuts, we have lost significant portions of our staffing, and school budgets continue to shrink. By forcing our already stretched agencies to participate in such a rigorous competitive grant application... is detracting from the very real issues that need our immediate attention, and actually takes away from the services our students and schools need and deserve." Rural states that have limited educational resources are further penalized by not having access to additional federal funds.</p> | <p>Maintain support for state efforts to improve the quality of their assessment systems, and to develop and implement the upgraded standards and assessments required by the College- and Career-Ready Students program.</p> <p>The program also will support competitive grants to consortia of states, and to other entities working in partnership with states, for research on, or development and improvement of, additional high-quality assessments to be used by multiple states.</p> |
| Comments | Blueprint Highlights |
| <p>School improvement grants (ESEA section 1003(g)): FY2010 \$545 million, FY2011 \$900 million.</p> <p>This language seems to replicate the current SIG program, with the exception of allowing funding for two additional years. The current regular funding for these grants will not provide sufficient funds to implement major reforms in more than a few schools each year. As stated in the April 27 letter to Secretary Duncan signed by rural state chiefs: "...many of our districts are considered frontier. We articulated challenges faced by districts in the remote areas regarding recruitment and retention of principals and staff. The challenges of these lowest performing districts do not rest solely on the backs of their principal, and we struggle to find quality administrators willing to take the helm of a school in such dire circumstances. Further, the idea of firing half the staff at these schools and finding replacements is a virtual impossibility. We are asking for flexibility for intervention programs that work in the specific communities that can truly address the roots of the issues our students face, such as extreme poverty, isolation and lack of quality services." Alaska requests flexibility in an intervention model that allows a school to keep, train, and evaluate principals / teachers rather than automatically requiring replacement; flexibility and support to implement our SSOS fully.</p> | <p>ED would make available significant grants to help states, districts, and schools implement the interventions required in each state's lowest-performing Challenge schools in the CCRS account.</p> <p>The ONLY interventions are: transformation model, turnaround model, restart model, school closure model. Under the grant, LEAs and their partners will receive 3 year awards to implement one of the intervention models and will be eligible for two additional years of funding. [USED has noted that they are willing to revisit the models to inject more flexibility].</p> |

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| Neglected and delinquent children and youth education (ESEA I-D): FY2010 \$50 million, FY2011 \$50 million. | |
| Comments | Blueprint Highlights |
| No comment at this time. | ED's proposal will ask districts to reserve funds received under the College- and Career-Ready Students program to support programs conducted by locally-operated institutions and to improve the direction of funds to support those programs. |
| Homeless children and youth education (MVHAA Title VII-B): FY2010 \$65 million, FY2011 \$65 million. | |
| Comments | Blueprint Highlights |
| Homeless Children and Youths Education, currently Title VII Part B. No comment at this time. | Formula grants to help states and districts put in place systems and services to meet the educational needs of homeless students. ED proposes better target funds to serve homeless students by allocating funds on the basis of counts of homeless students rather than by shares of Title I allocations. ED proposes to remove barriers to effective services. ED proposes to clarify provisions of the current statute |
| Impact Aid (ESEA VIII, section 8002, et. seq.): FY2010 \$1.27 billion, FY2011 \$1.27 billion. | |
| Comments | Blueprint Highlights |
| No comment | ED will continue significant formula grant support designed to compensate districts for the expense of educating federally-connected children and for the presence in their districts of tax-exempt federal property or other property removed from the tax rolls by the federal government. [How the calculations are made is under review]. |

| The Excellent Instructional Teams account is a new \$3.8 billion consolidation that takes nine FY2010 line items, including the Improving Teacher Quality State grants (ESEA 11-A), and proposes to consolidate them into 3 new, broader, competitive sub-accounts. | |
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| Comments | Blueprint Highlights |
| <p>Sub account 1: Effective Teachers and Leaders.</p> <p>This would be a formula grant that consolidates 2 programs (teacher quality state grants and ready to teach) and is an extension of the planning and reporting required under ARRA SFSE phase 2 data collection and reporting requirements. EED would support the formula grants for Teacher quality grants that support current state led initiatives. Process for approving state definitions is concerning- will there be people with rural experience on the review team?</p> | <p>States and districts may choose how to spend [these formula] funds to meet local needs, as long as they are improving teacher & principal effectiveness and ensuring the equitable distribution of effective teachers and principals. Key: Statewide definitions of "effective teacher," "effective principal," "highly effective teacher," and "highly effective principal," developed in collaboration with teachers, principals, and other stakeholders, that are based in significant part on student growth and also include other measures. This requires State level data linking teachers and student academic growth and it requires district-level evaluation systems.</p> <p>ED will require transparency around the key indicators of whether students and schools have effective teachers and principals and whether teachers have the professional supports they need.</p> |
| <p>EED would support formula grants for Teacher quality that support current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process.</p> | <p>Competitive grants for states and school districts that are willing to implement ambitious reforms to better identify, recruit, prepare, develop, retain, reward, and advance effective teachers, principals, and school leadership teams in high-need schools.</p> <p>May use funds to reform compensation systems to provide differentiated compensation and career advancement opportunities to educators who are effective in increasing student academic achievement, who take on additional roles and responsibilities in their schools, and who teach in high-need schools, subjects, areas, and fields.</p> |
| <p>EED would support formula grants for Teacher quality that support current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process.</p> | <p>Competitive grants to LEAs to improve and strengthen the recruitment and preparation of effective teachers, principals, and other school leaders by nonprofit organizations, colleges and universities, and school districts, through high-quality preparation programs that prepare educators for high-need districts, schools, subjects, areas, and fields.</p> <p>ED's proposal includes competitive grants for ... leadership teams to turn around persistently low-performing schools. This includes a substantial residency or field-based component and induction support for new principals and other leaders to succeed.</p> <p>Secretary would be allowed to reserve up to 5% of funds from this program for a national teacher recruitment campaign.</p> <p>[The account includes the Principals and School Leadership Teams program that would fund competitive grants to States and LEAs to support the recruitment, preparation, and retention of effective principals and school leadership teams who are able to turn around low-performing schools.]</p> |

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| <p>Special Education IDEA grants to States, including grants to States (IDEA-B-611) and preschool grants (619). FY2010 \$12.5 billion, FY2011 \$12.8 billion.</p> | |
| <p>Comments</p> | <p>Blueprint Highlights</p> |
| <p>As with many of the proposed changes in ESEA, Alaska requests flexibility that allows a school to keep, train, and evaluate principals / teachers; flexibility and support to implement our SSOS fully.</p> | <p>ED's proposal seeks to help ensure that teachers and leaders are better prepared to meet the needs of diverse learners, that assessments more accurately and appropriately measure the performance of students with disabilities, and that more districts and schools implement high-quality, state- and locally-determined curricula and instructional supports that incorporate the principles of universal design for learning to meet all students' needs.</p> |
| <p>English Learner Education (ESEA III, Part A), FY2010 \$750 million, FY2011 \$800 million.</p> | |
| <p>Comments</p> | <p>Blueprint Highlights</p> |
| <p>The Blueprint indicates continuation of "significant formula grants" but the current amount of Title III funding received is minimal to serve English Language Learners (ELLs, otherwise known as LEP students). Consider eliminating the current funding threshold of \$10,000 to receive a formula grant. Our districts must have almost 300 LEP students currently to receive a minimum \$10,000 grant.</p> <p>Alaska would support consistent criteria for statewide identification of ELLs, and especially a more reliable funding formula nationally based on accurate state level identification of ELLs. Another issue in the current law that needs to be addressed in reauthorization is the supplement, not supplant requirement that makes Title III funding supplemental to Title I. Title I funds are not available to serve LEP students in non-Title I schools, and this requirement complicates the way districts may use the funds effectively to serve students. The Title III funds should only be supplemental to state and local funds and should be able to be used in conjunction with Title I funds as applicable. ELLs should be held accountable under Title III only for making progress and achieving proficiency in learning English. They are already held accountable under Title I for academic proficiency in reading/language arts and math. Consider more flexibility to determine when an ELL student has achieved sufficient proficiency in English to take the content assessments in English. Right now the student only has 1 year of exemption from the language arts test and is never exempted from math, no matter what the level of English is.</p> | <p>Significant formula grants to help states and school districts implement high-quality language instruction educational programs to improve the education of English Learners.</p> <p>To ensure that formula grant assistance in these areas supports the conditions needed to foster English Learners' success, ED will require states to: Establish new criteria to ensure consistent statewide identification of students as English Learners; Implement a system to evaluate the effectiveness of language instruction educational programs, and to provide information on the achievement of subgroups of English Learners.</p> <p>New competitive grants to states, districts, and nonprofit partners to support the development of innovative programs, build the knowledge base about promising practices, and scale up effective practices.</p> |

| Indian, Native Hawaiian and Alaska Native education | |
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| Comments | Blueprint Highlights |
| <p>EED does not award these grants, direct to districts from USDOE. These grants are available to be used to support Native language immersion and Native language restoration programs. Sometimes this has caused a perceived conflict with the current requirements under Title III to test all limited English proficient students on the ELP assessment beginning in Kindergarten, even those that are only in Native language immersion programs. These two funding sources should be complementary, not contradictory.</p> | <p>ED will continue strong support – through formula and competitive grants to states; districts; Indian tribes; Indian institutions of higher education; Indian, Native Hawaiian, and Alaska Native educational and community-based organizations; and nonprofit organizations, agencies, and institutions – to help meet the unique needs of Indian students, Native Hawaiian students, and Alaska Native student</p> |
| Rural education (SEA VI-B), FY2010 \$174 million, FY2011 \$174 million. | |
| Comments | Blueprint Highlights |
| <p>As stated in the April 27 letter to Secretary Duncan signed by rural state chiefs: "We are asking for flexibility for intervention programs that work in the specific communities that can truly address the roots of the issues our students face, such as extreme poverty, isolation and lack of quality services." Currently, districts (not schools) defined as rural have several benefits. One benefit is to be eligible for additional formula grants under the SRSA or RLIS programs. These formula grants are awarded directly by USED and are currently very small. The largest in our state this year was \$43,000 and most are less than \$10,000.</p> | <p>ED's proposal seeks to improve targeting of [formula] funds by updating the method used to identify districts as rural and expanding the current "REAP Flex" authority....</p> <p>There is a need to better align the accountability requirements of the College- and Career-Ready Students program with the rural education program, so that the rural education program supports school improvement efforts in persistently low-performing districts.</p> |

| Education Improvement Programs account, \$1.9 billion for programs, an increase of \$251 million over the 2010 appropriation level. The increase represents a consolidation of many existing ESEA programs under 2 new broad program authorities: Effective Teaching and Learning for a Complete Education (which has 3 parts) & College Pathways and Accelerated Learning. | Comments | Blueprint Highlights |
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| <p>EED would support formula grants for strengthening our literacy program in our current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process.</p> <p>States that have already limited educational resources are further penalized due to limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not compete for funds to do so -if it is a federal requirement to adopt common core standards.</p> | <p>Competitive State and local grants to support the transition to higher standards by assisting states in strengthening their literacy programs and by providing substantial support to high-need districts in implementing high-quality literacy instruction....</p> <p>Priority will be given to states that have adopted common, state-developed, college- and career-ready standards. Priority will be given to districts that propose to align other local, state, and federal resources with their plan to improve literacy instruction....</p> <p>Competitive sub grants to high-need districts to support comprehensive literacy programs in the grades and schools with the greatest local need.</p> | |
| <p>EED would support formula grants for strengthening our math/science programs in our current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process.</p> <p>States that have already limited educational resources are further penalized due to limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not compete for funds to do so -if it is a federal requirement to adopt common core standards.</p> | <p>Competitive grants to support the transition to higher standards by assisting states in strengthening their STEM programs and by providing substantial support to high-need districts in implementing high-quality instruction in at least mathematics or science and may also include technology or engineering.</p> <p>Priority will be given to states that have adopted common, state-developed, college- and career-ready standards. Priority will be given to districts that propose to align other local, state, and federal resources with their plan to improve instruction in STEM....</p> <p>States will award competitive sub grants to high-need districts to support comprehensive STEM instruction in the grades and schools with the greatest local need.</p> | |

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| <p>EED would support formula grants for strengthening our art/foreign languages/history/ civics programs /etc. that support current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process. States that have already limited educational resources are further penalized due to limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not compete for funds to do so -if it is a federal requirement to adopt common core standards.</p> | <p>Competitive grants to states, high-need districts, and nonprofit partners to strengthen the teaching and learning of arts, foreign languages, history and civics, financial literacy, environmental education, and other subjects. . Priority will be given to applicants proposing to integrate teaching and learning across academic subjects; to use technology to address student learning challenges; and at the high school level, to work with colleges or universities to ensure that coursework is truly aligned with those institutions' expectations.</p> |
| <p>EED would support formula grants for strengthening accelerated learning opportunities in our current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process. States that have already limited educational resources are further penalized due to limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not compete for funds to do so -if it is a federal requirement to adopt common core standards.</p> | <p>Competitive grants to states, districts, and nonprofit partners to increase access to accelerated learning opportunities for students. At the high school level, these opportunities will include college-level work. At the elementary and middle school levels, these opportunities will include access to gifted and talented education programs. Would replace the current Advanced Placement, Javits Gifted and Talented Education, and High School Graduation Initiative programs Priority will be given to applicants that propose to serve high schools with low graduation rates and that partner with state higher education offices and institutions of higher education in a program that allows higher education credits to be portable beyond the individual partner institution or institutions. ED's proposal will continue to provide support to states to improve access to AP tests for low-income students.</p> |

| Comments | Blueprint Highlights |
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| <p>Promise Neighborhoods (ESEA V-D, subpart 1), FY2011 \$210 million</p> <p>EED would support formula grants for strengthening community outreach activities in our current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process.</p> <p>States that have already limited educational resources are further penalized due to limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not compete for funds to do so -if it is a federal requirement to adopt common core standards.</p> | <p>Competitive grants to support the development and implementation of a continuum of effective community services, strong family supports, and comprehensive education reforms to improve the educational and life outcomes for children and youths in high-need communities, from birth through college and into careers.</p> <p>Programs will be encouraged to take a comprehensive approach to meeting student needs, drawing on the contributions of community-based organizations, local agencies, and family and community members.</p> |
| <p>Successful, safe, and healthy students (SSHS), FY 2011 \$410 million.</p> | <p>Successful, safe, and healthy students (SSHS), FY 2011 \$410 million.</p> |
| <p>EED would support formula grants for strengthening successful, safe and healthy student activities in our current state led initiatives. Rural states that have limited educational resources may be penalized by not having access to these additional federal funds through the proposed competitive process.</p> <p>States that have already limited educational resources are further penalized due to limited access to resources and the ability to adequately adopt the common core. States that do not adopt should be given extra funds in order to adequately adopt them, not compete for funds to do so -if it is a federal requirement to adopt common core standards.</p> | <p>Competitive grants to support states, school districts, and their partners in providing learning environments that ensure that students are successful, safe, and healthy.</p> <p>Grantees will be required to develop and implement a state- or district-wide school climate needs assessment to evaluate school engagement, school safety (addressing drug, alcohol, and violence issues), and school environment, and publicly report this information.</p> <p>Priority will be given to applicants that propose to support partnerships between districts and nonprofit organizations, including community-based organizations. Priority will also be given to grantees willing to direct funds to schools with the greatest need, including Challenge schools.</p> |

21st century community learning centers (SEA IV-B), FY2010 \$1.17 billion, FY2011 \$1.17 billion.

Comments

While competitive grants are useful for some opportunities, there needs to be more balance between formula funding and competitive grants. We are concerned about the lack of any formula funding for some of the program areas such as literacy, technology, and safe and healthy students. Small states and small districts within states are at an inherent disadvantage in applying for competitive grants, even if there is a rural or high needs preference. We see this at the SEA level in terms of the types of LEAs that choose to apply for state-level competitive grants. Staff in small districts and states are usually wearing many hats and simply do not have the additional time to spend on competitive grants that may or may not be awarded. They often have difficulty in finding sufficient time to adequately prepare grant applications for formula funding. Even if the state receives formula funding, it puts an extra burden on staff at the SEA level to award the grants through a competition. The resources provided by the USED in terms of comprehensive centers and other technical assistance are appreciated, but not sufficient to overcome the lack of human resources on staff or the lack of funding to secure the outside assistance need to develop multiple competitive applications. While we appreciate the fact that a competitive grant attracts only those states or LEAs that are really interested in receiving the funding, we would encourage a portion of the grants to be formula driven, or awarded non-competitively to frontier, rural states.

Blueprint Highlights

Competitive grants for states, school districts, nonprofit organizations, and partnerships to implement in school and out of school strategies that provide students and, where appropriate, teachers and family members, with additional time and supports to succeed. Priority will be given to applicants that propose to carry out programs to support the improvement of Challenge schools identified under the College- and Career-Ready Students program

| State wide Innovation Programs | |
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| Comments | Blueprint Highlights |
| See comments for 21st Century community learning centers | Competitive grants to states and school districts to take on ambitious and comprehensive reforms, and to encourage the broad identification, dissemination, adoption, and use of effective policies and practices. |
| See comments for 21st Century community learning centers | Builds on the 13 program launched through the American Recovery and Reinvestment Act of 2009, and will provide additional competitive grants to expand the implementation of, and investment in, innovative and evidence-based practices, programs, and strategies that significantly improve student outcomes. |
| Expanding educational options: \$490 million for the new consolidated Expanding Educational Options account. | |
| Comments | Blueprint Highlights |
| See comments for 21st Century community learning centers | Competitive grants aimed at increasing the supply of high-quality public educational options available to students. Charters: Competitive grants to states, charter school authorizers, charter management organizations, districts, and nonprofit organizations, to start or expand high-performing public charter schools and other high-performing autonomous public schools, with a priority for applicants proposing to start or expand high-performing public charter schools....Applicants will be evaluated based on their record of past success in funding, supporting, authorizing, managing, or operating (as relevant) high-performing public charter schools or other high-performing public autonomous schools; their record of cutting off funding to or closing low-performing charter schools or other low-performing autonomous schools; and their commitment to improving the quality of their schools. |
| See comments for 21st Century community learning centers | Choice: Competitive grants to districts, consortia of districts, and states in partnership with districts to expand high-quality public school educational options for students, especially students in low-performing schools, and ensure that students and families are aware of these options. |
| See comments for 21st Century community learning centers | Continue competitive grants to districts to support magnet schools under a desegregation plan ordered by a federal court, state court, or other authorized state agency or official, or approved by the Secretary. |

| Blueprint Cross Cutting priorities | |
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| Comments | Blueprint Highlights |
| ED wants to infuse tech throughout the law. The meaning of "infuse" is not clear. Will this be allowable or a required set aside? Technology is important, and while it may be encouraged or even required, a distinct funding stream specifically for technology is still important to ensure that it is addressed. | (1) Technology. Technology, effectively and thoughtfully deployed, can improve how schools work, how teachers teach, and how students learn. Priority may be given to programs, projects, or strategies that leverage digital information or communications technology to accomplish the stated goals of the grant. |
| (2) Evidence. As evidence develops in new areas, funding should be devoted to the areas with the most evidence of effectiveness in improving outcomes for students. Priority may be given to programs, projects, or strategies on the strength of their evidentiary base. | |
| (3) Efficiency. Particularly in the current economic situation, it is important to do more with fewer resources. Priority may be given to programs, projects, or strategies that are designed to significantly increase efficiency in the use of resources to improve student outcomes. | |
| (4) Supporting English Learners and Students With Disabilities. Schools, districts, and states must be held responsible for educating all students, including English Learners and students with disabilities, to high standards, but more work could be done to develop and scale up effective strategies for these students. Priority may be given to programs, projects, or strategies that are designed to specifically improve the performance of English Learners or students with disabilities. | |
| | (5) Supporting Rural and Other High-Need Areas. In new competitive programs, ED will be putting in place appropriate strategies to ensure that rural districts and other high-need districts are not disadvantaged and are able to receive the funding they need to help students succeed. Priority may be given to programs or projects designed to serve rural and other high-need areas. |