

The Civil Rights Project



Proyecto Derechos Civiles

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Thank you for this opportunity to comment on the Miller-McKeon “Discussion Draft” of the Reauthorization of the Elementary and Secondary Education Act” for the reauthorization of the No Child Left Behind Act. The Civil Rights Project's central focus has been educational opportunity and our research indicates that Title I can significantly improve outcomes for disadvantaged children throughout our nation but that potential has yet to be realized. Our research also shows that the No Child Left Behind Act falls short of its laudable goals in important ways. Therefore, we thank you for your tireless and bipartisan efforts to strengthen this law in this promising draft.

The core mission of the civil rights project is to bridge the worlds of ideas and action in service to the civil rights movement in America. We commission research and work with scholars across the country on education reform toward the pursuit of racial and ethnic equity. Specifically, we have conducted 19 studies during the initial congressional consideration of the law and ongoing studies of the NCLB implementation process in six states and 11 school districts. In addition our work on the book, *Dropouts in America* and on regional reports and conferences around the country on this issue has put us in the center of the movement to lower the scandalous loss of students in our high schools. We believe that the breadth and depth of our research, always centered squarely on issues of racial justice, makes us well positioned to comment on the draft. Our research informs our testimony.

We believe the draft proposal contains changes that can be expected to improve the equality of opportunity for all children and especially disadvantaged children of color. However, we have also found several serious shortcomings and inconsistencies in the draft bill and we have attempted to provide specific suggestions for improving the draft, some of which are broad, while others suggest specific changes to the legislative language.

Multiple Measures:

Among the most important improvements in this proposal is its call for multiple measures to be used to evaluate schools and for allowing educators to receive accountability credit for significant growth on several indicators besides assessments in reading and math. To the extent that the theory of test driven accountability shapes school teaching, the health of the country depends on having standards in more than two or three subjects and the health of the democracy requires, for example, that students know something about our history and government. This principled shift toward a multiple measure system was expressed in a letter that was signed by over 20 prominent civil rights organizations, and sent to the members of this committee a few weeks prior to the release of this draft. It is not good for civil rights if students in high poverty black and

Latino schools have their education reduced to rote drilling in limited subjects when this comes at the expense of every other aspect of the curriculum not tested. As a remedy, we support broader accountability and ending the incentive for schools to push out or transfer out students with lower test scores. This draft represents a major stride toward such accountability.

On the other hand, the most serious flaw in this draft concerns the retention of an arbitrary accountability time line, that all students be proficient by 2014, along with a set of calibrated benchmarks. This uniform deadline assumes that the schools and districts furthest from the goal can make the most extraordinary gains. But the assumption directly contradicts what research tells us about the rates of improvement we can expect from the most successful districts. The goal of 100 percent proficiency in six more years will not be attained because all schools and districts would have to do something that has never been done in any district unless the standards were extremely low. The solution is straightforward--set reasonable growth goals and hold schools and districts accountable for improving at a rate that research says is attainable. Specifically, the 100% proficiency requirement by 2014 undermines the credibility of the law, punishes rather than rewards many successful schools, and should be replaced by realistic growth targets based on the progress achieved in the quartile of districts making the most rapid progress in the state. This is consistent with the shift of attention to progress measures in the draft bill. Shifting the focus from the unattainable ideal to ambitious yet realistic goals would also help create conditions more likely to encourage highly qualified teachers and principals to stay in the schools that most seriously need them.

The draft proposal also adds strength reporting where it expands on the *requirement* that states include in their accountability system's determination of adequate yearly progress high school graduation rates and at least one other achievement indicator for elementary schools. The major changes here are that the draft would require disaggregation for subgroups for graduation rate accountability and enable states greater power to create more balanced and comprehensive accountability systems, subject to the approval of the Secretary. CRP applauds the draft's addition of these critically important accountability changes. However, we urge the committee to add as a possible, if not required, indicator that schools and districts measure progress on grade promotion rates. We believe states should be required to report these rates disaggregated by subgroups and encouraged to address the problem of the massive retention of students, particularly in the high school transition years, most profoundly in grade 9. Adding this measure to reporting and accountability is important because research on retention in grade has shown that it is extremely expensive, has few academic benefits, and increases dropout probabilities.

Graduation Rate Measurement and Accountability:

Our research shows that the widespread failure to earn a high school diploma has had a devastating impact, especially in nonwhite communities where employability and income are drastically reduced with predictable effects on family instability and crime. In some districts more than half of our African American, Latino and American Indian students fail to earn high school diplomas. Failure of this magnitude represents a clear and present threat to our social and economic future. Research shows that massive flunking in ninth grade, before tenth grade testing, is a chronic problem especially among minority youth, and is linked to higher dropout rates. Without graduation rate accountability, schools evaluated based on test scores can look successful if more of their relatively low achieving students are retained in grade 9, and then dropout. The new, more comprehensive accountability system this discussion draft introduces would reveal this artifice when it masks fundamental failure. Toward this end, the addition of graduation accountability for subgroups of children for graduating with a real diploma is critically important. Moreover, the discussion draft's emphasis on graduation can be expected to make the whole accountability system more rigorous and effective for all.

However, we are especially concerned that despite the tremendous improvement in the draft proposal, and to the extension of Title I resources and focus on high school reform, there are also some serious concerns we have about the discussion draft's accountability program and unintended incentives for putting students on slow-tracks toward graduation. Just as research suggests the definition of proficiency was "watered down" in

some states in response to greater test based accountability, we worry that the standard graduation rate, that is supposed to evaluate the typical four year high school by calculating the percentage of students of a entering high school cohort that graduate “on time” (in four years) with real diplomas, will similarly be watered down.

Specifically, we are also concerned that the discussion draft’s system for accountability and reporting of graduation rates, where it introduces the “extra year” simultaneously introduces accountability loopholes and unnecessarily complicates the evaluation of high schools. Based on our work with public education and civil rights advocates, we believe that transparency will make reporting and accountability systems far more effective at generating public pressure on the right problems. While it may be possible to close the loopholes and retain the system as drafted, we recommend replacing the “extra year” provisions for reporting and accountability with a simpler and more manageable system. We need a clear and relatively simple metric that shows whether schools are moving forward or backward on the goal of graduating their students on time. They should also be credited separately for work they do to graduate students later without introducing uncertainty into the basic measure.

The required calculations and reporting requirements of two groups, an “adjusted cohort” graduation rate and an "extra year" adjusted cohort rate both complicates and waters down the “on time” four year rate. The clarification of the “graduation rate” is a considerable improvement over the current law to the extent that it provides a uniform definition, is based on the performance of a cohort of students, and helps eliminate many of the loopholes in reporting and accountability that CRP’s research has revealed as contributors to artificially inflated graduation rates which have often greatly overstated true completion levels. Despite these substantial and critically important improvements, the "adjusted cohort" definition as drafted in Section 1124 beginning on page 318 at line 17 is flawed because there is no reference to the "standard number of years" or a "4 year" rate for high schools that begin in grade 9, as provided in the original NCLB. By leaving the "exit year" undefined and unbounded this way, schools are not evaluated according to a standard expected time for completion. This might allow a watering down of the standard graduation rate for reporting called for in the National Governors Association compact on this subject. Further, if graduation rates could be based on different exit years this variability would make comparing rates from school to school or district to district much more difficult.

The construction of the EXTRA YEAR graduation cohort in Section 1124 opens up tremendous accountability loopholes: Few students transfer after they complete Grade 12 (Grade 13?) as an “Extra Year” transfer if they move to a new district. On the other hand, many students who do not pass grade 12 in their first attempt try again over the summer or in this EXTRA year (Grade 13). The draft proposal’s language on transfer confirmation is strong where it requires formal documentation of the transfer from the receiving school or diploma awarding educational program. In contrast, the departure confirmation is very weak as it requires formal documentation from the school that the student has departed from but no formal confirmation from a parent or guardian or other close relative. Therefore, the net impact is that while very few students will transfer in, if students move out of district after flunking grade twelve their departure can artificially improve the performance of a regular high school.

There are complex issues here that make strengthening the departure confirmation requirement problematic especially in highly mobile communities. Fundamentally, if the parents failed to provide formal notice, schools cannot easily get reliable confirmation from another source. The extra year, therefore, adds an extra year of very difficult to confirm departures from the cohort. What makes matters worse, is that all of these “extra year” departures are, by definition, students who were counted as “non-graduates” for the standard “on time” or four year cohort. In other words, all of the difficult to confirm departures in the “extra year” would have previously counted against the school and district for “on time” rate accountability giving struggling schools a tremendous incentive to record dropouts as “extra year” departures.

The Civil Rights Project suggests eliminating the “extra year” adjusted cohort entirely. Federal law should maintain the primacy of the “on time” four year rate and only require states to track and report the adjusted cohort graduation rate cohort as it pertains to an “on time” graduation rate. In this way, when there is public discussion of the graduation rate, all will know this is the standard four year rate. The technical solution is to both eliminate the "extra year" rate and add language to the construction of the “adjusted graduation rate cohort” indicating that it is a “four year” or “on time” rate , or "based on the standard number of years."

Graduation Rates Counting for AYP

The new discussion draft adds language that sets a graduation rate goal of 90% and would reward schools and districts that fall short of this goal, but that meet the graduation growth rate with a bonus of up to 15 percentage points that could be used as an offset against calculating AYP based on assessments. This is a major improvement as it represents a reasonable compensatory system. We also believe the discussion draft adds important vitality to graduation rate accountability where it delineates the reasonable growth rate requiring an average of 2.5 percentage points for what we interpret to be a standard “on time” or 4 year adjusted cohort. To build on these strengths, we encourage the drafters to attend to three major weaknesses of the extra year and alternative schools provisions pertaining to graduation rate accountability.

1. **There is no research that would support applying a uniform growth rate of 2.5% and a goal of 90% graduation to all alternative schools.** The category of alternative schools includes those that serve as "dumping grounds" for students regular high schools will not deal with as well as schools that are led by amazing staffs who give new chance to young people who face what seem like hopeless odds. Obviously accountability should target the dumping grounds and reward the heroic efforts. While this accountability might be appropriate for some schools we believe it is misplaced as it would apply to many others. The issue arises because the discussion draft fails to acknowledge the wide diversity of such schools, and the fact these schools usually serve the very highest risk student populations. An alternative school of this sort that reaches out to dropouts, students who have been in prison, and teen parents, with a graduation rate of 65% earning real diplomas, is a success. A regular high school with that rate should be regarded as failing. Rather than apply the same graduation rate goals to schools serving the most at risk populations as regular schools, NCLB should provide schools and districts with incentives to help these youth earn real diplomas in extended years. This is the kind of issue where the standard may best be set by state officials working with experts, subject to federal approval.
2. **If extra year rates are the equivalent of “on time” rates for accountability there is an incentive to put disadvantage minority youth on the “slow track” so that the school can improve the chances of making AYP.** The EXTRA year rate should never be allowed to wholly substitute the “on time” rate for a school designed around a four year system. As the discussion draft is written, a school could make AYP and earn a 15% compensatory bonus even if the 4 year rate declined. The Civil Rights Project is concerned that low achieving students, and especially students of color who have a history of being segregated into low tracks in secondary school, could be put on the slow track to make it easier for the school and district to meet the disaggregated graduation rate goals. Further, at least one study indicates that a diploma earned in 5 years is far less valuable than one earned “on time.”
3. **A third major problem is that The EXTRA YEAR accountability provision gives schools and districts many more ways to game the system including an incentive to increase grade 9 retentions.** Schools are currently encouraged to improve scores artificially because in part because test scores are carefully counted and graduation rates are not. We are concerned that without safeguards, the "extra year" would introduce an new incentive to retain more low achieving students at grade 9 where schools could add a year of test prep for the grade 10 test, knowing they have an extra year to finish school. District data indicate that the highest numbers of students dropout of high school before grade 10. The unintended consequences of adding an extra year is that it also adds an incentive for retaining

students in grade 9, where the extra year could be used for test preparation.

CRP recommends replacing the 5 year and alternative school accountability with an extended years graduation rate safe harbor provision. We believe that there are better and simpler ways to provide schools and districts with greater incentives to help students needing more time to eventually earn their high school diploma. There should be a basic “on time” rate plus a second chance provision (safe harbor) that gives credit for all extended years diplomas, not just one extra year.

The suggested safe harbor would give districts equal credit for all the students that earned a diploma in a given year, including all those that needed more time, without a limit. This would make the whole section easier to read, and would mean that alternative schools would not be required to achieve the same high goal or rate of growth as regular high schools. The provision we recommend would provide an incentive to reach out and serve students who needed more time as it would allow for AYP to be made by a school or district that had an extended years program if the additional diplomas of the program participants, when added to the standard “on time” calculation, enabled the 2.5% growth requirement to be met. All alternative schools not linked to a specific high school would have their diplomas count toward the district’s safe harbor. To retain the primacy of the “on time” goal and ensure that the greater incentive was to have students graduate “on time” the availability of the 15% compensatory bonus could be either reduced, or eliminated if the safe harbor was needed to make AYP. CRP suggests that additional safeguards should further limit the use of the safe harbor to when four year graduates constitute at least 75% of the diplomas awarded. This safeguard would prevent a struggling school abusing the second chance provision and putting all low achievers on a slow track to graduation. On the other hand, where proven-effective specialized or alternative high schools and programs were purposefully designed to award diplomas after five years, the law should make waivers available subject to the review of the Secretary.

The basic Graduation Rate Safe Harbor provision could be worded as follows:

Graduation Rate Safe Harbor:

Schools and districts that fail to meet the 2.5% growth requirement may still make AYP for graduation rates if all the following conditions are met:

- a. The school or district’s “safe harbor graduation rate” in paragraph (b) for the group or groups in question was at least 2.5 percentage points higher than the 4 year rate for the prior year and at least 75 percent of the diploma recipients, overall or for any subgroup are four-year “on time” graduates.
- b. The “safe harbor” graduation rate is determined by adding the number of diploma recipients that were awarded in the current year to students that are not part of the current year’s adjusted cohort to the numerator and denominator of the adjusted cohort graduation rate calculation. If the “safe harbor” rate is 2.5% points or more higher than the “on time” graduation rate for the prior year the school or district makes AYP.
- c. Safe Harbor Restrictions: A state may award a maximum of 5 bonus points to a school or district for achieving the AYP graduation rate goal under the safe harbor provision.

Longitudinal Data Policies and Oversight

Even in states with advanced longitudinal data systems may need a combination of support and oversight. Our recent review of the Texas system, regarded by many as the “gold standard” revealed how the state adopted policies that seriously reduced the usefulness of the data, such as failing to track GED enrollees or treating all duplicate records and students with unknown status as errors and erasing them from the system. Therefore, law should require additional quality control measures and funding of these systems to ensure they are adequate and have policies in place that will accurately track students who otherwise might disappear from school records. If these systems are not able to document the destination of substantial

numbers of students, especially students of color, who simply disappear from the system, it will not provide a reliable source for policy making and evaluation of educational progress.

Discipline Data

CRP commends the committee's draft for requiring local educational agency report cards to include rates of suspension and expulsion disaggregated by subgroup in Section 1111 (2)(B)(ii)(III). However the state report card provisions should contain a parallel provision, including the disaggregation of this data in state reports.

Transfer Options Triggered by Accountability

In several places the draft acknowledges that rigorous standards and raised expectations must be paired with serious support provided to those schools and districts needing to make hard changes. One of these is providing a transfer option to students in schools and districts needing improvement, having failed to make AYP for two consecutive years. In particular we applaud that the draft would authorize states to enable the most disadvantaged students in low performing districts the first opportunity to transfer to highly functioning districts.

As it stands problems often arise under the transfer provision where a school not meeting standards is required to permit its students to transfer to a school meeting standards in the same district. That is not adequate because, for technical reasons, the transfer options are limited in most districts and often do not include many options to attend less impoverished schools with genuinely higher levels of academic success. In fact, because a school can fail AYP because of the performance of a single subgroup or because 95% of the students were not tested, students are often faced with the option of transferring to a school with an overall lower average achievement level than the school they are leaving. Funding a transfer from a weak school to a weaker one is an inexcusable waste of money.

Further, while the draft correctly would not allow transfers to schools filled beyond their capacity, the lack of viable transfer options is all too often the reality in large urban districts with few highly performing schools and many struggling ones. The draft should add the option to transfer to a school located in a different district should the immediate district not have enough highly performing schools to accommodate all the transfer candidates. Toward the goal of providing truly beneficial transfer opportunities, we urge the committee to add financial incentives for receiving schools and districts to encourage the use of the inter-district transfer provisions and for transfers to the very highest performing schools within a given district.

Extensive research on voluntary transfers and school choice in many contexts and even in other countries consistently shows that disadvantaged parents have little information about the choices and are much less likely to transfer to the best options than families with more resources and connections. For this reason good magnet school plans tended to provide extensive parental information about school quality and opportunity and active personal outreach and welcome to disadvantaged parents through parent information centers and other mechanisms. We believe that such efforts are needed.

Without such mechanisms we believe that the transfer resources are likely to produce little or no real gain in too many cases.

Supplemental Services

Supplemental services such as tutoring by highly qualified educators can be invaluable. However, there is no evidence that the existing SES program is a wise investment and many reasons, from research on serious school reform, to think that it is not. Specifically, there is very little research documenting the effectiveness of Supplemental Educational Services. Until there is better evidence of the effectiveness of these programs, they should not be required and there should not be a mandated set-aside. The worst result would be to

create a new lobby of corporate providers able to secure funding without accountability. Tutoring is a valuable educational process but most likely to be effective when done on a one-to-one basis by a professional teacher and linked to the school's curriculum.

If the set-aside is to be continued, we suggest adding a federally mandated evaluation of the entire program, possibly in place of the requirement for local evaluations in the draft since few districts have the capacity to do professionally credible evaluations of this sort and studies by providers represent fundamental conflicts of interest. We further recommend that SES instructors be subject to the Highly Qualified Teacher provisions of NCLB since we agree with the law's fundamental emphasis on teacher quality.

Budget Set-Aside

Since only one in fifty eligible students has chosen the transfer option, we recommend that that set aside be limited to 5% for possible highly positive transfers (described above) and that 5% of the current set aside be transferred to state school improvement efforts and the remainder into implementation of the school's improvement plan, which could, of course, include targeted tutoring linked closely to the school's educational mission

If SES is to continue, it is essential to have a serious independent national evaluation documenting what is being done with the money and identifying its longitudinal effects. Further, federal antidiscrimination laws should be made clearly applicable to SES providers by formally identifying them as recipients of federal funding. The current language in the draft on this subject is found in the current law, but there are serious questions as to whether it is sufficient to prevent SES providers from discriminating.

State Capacity

The Civil Rights Project's research in this area has revealed a major problem with the expanding state role in the current law, that is not addressed in the committee's draft—that is that the states receive more adequate funding for the extremely complex tasks they are given under this law. We recommend that the state share of the Title I allocation be doubled to 10 percent. Our research in six states shows that the state agencies are overwhelmed and have few resources to oversee the required reforms of very large numbers of schools falling behind NCLB goals. Anyone who has examined the disaster of Katrina or knows the excellence of the National Park Service should recognize how decisive good and expert administration is essential in managing complex and difficult changes. It is obvious to us from our research on state capacity that state officials working with the best of attentions simply do not have the resources to do what the law demands of them. Requiring fundamental changes without creating administrative capacity is an exercise in rhetoric.

Charter Schools

Charter schools are public schools with special governance arrangements expected to provide services regular public schools cannot or have not provided, increasing the opportunity for students. In light of the fact that these schools disproportionately serve minority students and are offered as options for transfer for those families under the law, and public schools may be involuntarily transformed into charter schools, it is very important that they be evaluated and the information be made available to citizens and families with transfer rights. NCLB should more explicitly require that all publicly funded schools in each state be evaluated under the same terms and subjected to the same level of accountability. .

The Testing and Accountability For English Language Learners

The testing and accountability for English language learners have been central points of contention in the

operation of NCLB because of the conflict between the very good ideas of subgroup accountability and inclusion of English language learners in the groups of students the schools are responsible to help and the bad problems of severely inadequate tests and unreasonable expectations. We believe that this draft bill makes some important positive changes but that its benefits could be strengthened. We call attention to two major issues:

The bill definitely moves in a positive direction in requiring the use of the tests most likely to adequately measure students' knowledge of the subject, independent of the language dimension. The requirements to develop appropriate tests and other measures as well as appropriate assessments of English language development are substantial improvements. Although the existing NCLB has greatly accelerated work on these issues it is important to note that there is still much that needs to be learned about the psychometric construct of English proficiency, its relationship to academic language, and what expected growth targets may be for different groups of students, at different ages. Even California, which has by far the largest ELL population and has invested in this work, is far from firm conclusions and many other states have not demonstrated the technical or policy will yet to pursue these issues. Much of the work has been on Spanish-speaking students and addressing many small language populations has yet to begin. Therefore the law should strongly encourage research and test construction at the national level and among regional consortia of states, initially for the largest language groups, particularly those facing linguistic isolation in communities and schools. States should be required to develop or collaborate in developing such tests for large language groups, either on their own or in cooperation with federal projects or multi-state consortia should be encouraged. States should be required to use these measures as soon as they are available since they will offer much more accurate measures of students' knowledge and progress than existing tests.

In the very important sections on teacher quality the lack of any real preparation for teachers to deal with the tenth of students who are ELL is not mentioned as part of the quality definition. In a situation where a tenth of our students are ELLs and almost half of teachers have ELL students in their classes, highly qualified teachers need training to help reach these students. We believe that the Department of Education and state Departments should be required to prepare analyses of key competencies such teachers need and to submit plans to provide the necessary preparation for teachers who wish to be considered highly qualified in areas and schools with substantial presence of such students.

Prioritization and Sanctions

The draft proposal includes provisions to allow Priority Schools and High Priority Schools to select from a menu of options. Priority Schools must select 2 or more and High Priority Schools must select three specified, plus one additional option. We do not think Congress should require multiple simultaneous reforms from deeply troubled schools with limited capacity. This tends to produce confusion. CRP recommends that schools identified for improvement, including those identified as priority schools and high priority schools, be allowed to choose developing a schoolwide program as an additional important option. This suggestion reflects the judgment of Congress in enacting the Obey-Porter legislation and the many references in the draft law to research based strategies. We recommend focusing on evidence-based school improvement strategies and giving them time to work.

School Redesign

This is a central provision. We recommend that the ultimate sanction of converting a school to a charter school be rewritten to include schools that have charter-like independence within a public system, including magnet schools and pilot schools, since both have evidence of positive benefits, including the new evaluation of Boston's pilot schools. Magnets and pilots share the charter situation of autonomy from normal system requirements, leaders and teachers and parents who chose to participate, and educational experimentation and

competition. There is no evidence that the fact that they are under ultimate legal control of a school district makes them less effective than charters.

Feasible Levels of Simultaneous School Transformation.

We strongly support the authorization to school district to limit the number of schools designated for High Priority Redesign but believe the fraction of schools subject to simultaneous drastic redesign is still too high given the intensity of the effort needed to create new schools or fundamentally restructure existing ones. Based on work we and others have done on administrative capacity we recommend that this be limited to 2 - 4% of schools in a given year.

Setting the Agenda for Collaboration on Educational Breakthroughs.

We strongly recommend that Congress direct the National Academy of Sciences and National Academy of Education to prepare a report to Congress by 2009 on the non-school conditions, such as health care, residential instability, poverty, safety and others that create serious obstacles for schools striving to achieve the goals of NCLB and to suggest central issues for other governmental and private agencies to address which would have demonstrable impacts on school success. As this draft bill acknowledges in several areas, lasting success in school requires support from other agencies and governmental programs This report would include reviews of present and previous experiments and policies in the U.S. and other nations demonstrating effective reforms, helping Congress and the executive branch create a federal agenda that would greatly aid both the schools and children living in poverty and would be of great interest in many states and communities and private organizations.

Indian Education.

The CRP appreciates the extensive discussion of Indian issues in the draft bill and urges clarification of the rights of tribally controlled schools to determine their own assessment policies and urges consultation with the Indian Education Association in the development of policies implementing the new law. We recommend that the procedures for developing more appropriate assessment of special education students include a specific directive to consider the special conditions of Indian populations.

Conclusion

We believe that the proposed revisions to NCLB should foster greater equity in educational opportunity for American children, and substantially improve learning and graduation levels. With further improvements to the excellent beginnings in this draft, we believe that educators and communities across the country will find that their concerns have been heard along with new inspiration to help achieve its challenging goals.

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