

October 23, 2013

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

INVEST IN WHAT WORKS

Dear Secretary Duncan:

Thank you for your continued commitment to educational excellence and equity, and for pursuing a results-oriented policy agenda to achieve those goals. We appreciate the U.S. Department of Education's continued commitment to investing taxpayer dollars in ways that will improve student outcomes and more effectively address the educational needs of communities across the country.

We are writing to strongly urge you to implement the attached administrative policy recommendations before the Department's FY15 budget request is submitted to Congress and to include the attached legislative policy recommendations in your FY15 budget submission and future ESEA reauthorization proposals. These recommendations will help improve student outcomes, drive more resources toward activities with a demonstrated record of success, and enhance the effectiveness of federal programs. These recommendations, which we developed with guidance from state and local school district decision-makers, as well as leading researchers, practitioners and policymakers, are also consistent with the Office of Management and Budget's July 26, 2013, memorandum urging Heads of Executive Departments and Agencies to make evidence and innovation top priorities in their FY 2015 budget submissions.

We believe that these six policy recommendations will help the U.S. Department of Education more effectively support states, districts, educators, families, and communities prepare each young person for success in careers, college, and citizenship. We thank you in advance for considering these recommendations, and would welcome the opportunity to discuss them with you and your team.

Sincerely,

AdvancED
Alliance College-Ready Public Schools
Aspire Public Schools
Breakthrough Schools
Citizen Schools
City Year
Communities in Schools
Community Training and Assistance
Center
Education Northwest
Forum for Youth Investment
Green Dot Public Schools
IDEA Public Schools
KIPP
Knowledge Alliance
KnowledgeWorks

Mile High United Way
National Forum to Accelerate Middle-
Grades Reform
New Profit Inc.
Results for America / America Achieves
Rocketship Education
Southwest Solutions
StriveTogether
Success Academy Charter Schools
Success for All Foundation
Teach For America
Teach Plus
United Way for Southeastern Michigan
Uplift Education
YES Prep Public Schools

Cc: Denis McDonough, Sylvia Mathews Burwell, Cecilia Muñoz, Gene Sperling, Jason Furman,
Jim Shelton, Emma Vadehra

LEGISLATIVE POLICY RECOMMENDATIONS

(1) Require states to set-aside 1% of their Title I and Title II funds for investments in evidence-based solutions within their poorest school districts

The Secretary should require states to set-aside 1% of their total Title I and Title II allocations (prior to distributing them to local school districts) and award these funds on a competitive basis to local school districts that submit applications with plans to invest these funds in initiatives to improve student achievement and graduation rates among disadvantaged students. These competitive grants should be targeted to the quarter of local school districts in the state with the highest concentration of students living in poverty through a tiered-evidence funding framework similar to the Investing in Innovation (i3) fund framework.

(2) Set-aside 25% of ESEA Title II-A funds (the Effective Teachers and Leaders State Grants) for competitive awards to states, high-need local districts, and national non-profit organizations for educator training programs with evidence of effectiveness, including 10% of ESEA Title II-A funds for the SEED program.

- The Secretary should set-aside 25% of ESEA Title II-A program funds each year, as outlined in the Administration's FY14 budget request, to make awards to states, high-need local school districts, and national non-profit organizations to create new or to enhance existing programs to improve the effectiveness of educators, including a 10% set-aside of Title II-A funds to support the Supporting Effective Educator Development (SEED) program which makes grants to national non-profit organizations, including high-quality charter management organizations, to support teacher and school leader enhancement projects with evidence of effectiveness; and to invest in other efforts to enhance the teaching and leadership professions. The Secretary should award these competitive grants using a tiered-evidence funding framework to support high-quality educator training programs with proven track records of success that meet the criteria for "strong" or "moderate" evidence of effectiveness as defined by the Education Department General Administrative Regulations (EDGAR). Such investments will help to ensure that those programs supported by at least moderate or strong evidence of effectiveness as defined in EDGAR will continue to serve the students, teachers, school leaders, and communities most in need.

(3) Set-aside 1% of all federal education program funds for rigorous, independent, third-party evaluations

- Setting-aside 1 percent of federal education program funds for rigorous, independent, third-party evaluations would enable the Secretary to: evaluate diverse approaches, grantees and initiatives; build the evidence base of which interventions are most effective and why; shift toward policies that focus on outcomes and success for kids by identifying those policies that maximize opportunities for innovation; and streamline these policies to allow funds to be driven toward those initiatives that result in the most success and the highest return on taxpayer investment. These evaluation funds should have flexibility to

be used across programs and be managed responsibly in partnership with independent, third-party institutions to ensure studies are designed and implemented effectively, will yield the most actionable and reliable data possible, and will build a better evidence base for what works to improve educational outcomes while also driving continuous program improvements. In addition, these evaluation funds should allow for a range of methodologies and the results of funded studies should be used to inform ongoing policy development and program enhancements. This evaluation provision would also provide Members of Congress and the Administration with reliable information to gauge program effectiveness and to make policy and funding decisions based on outcomes.

Support for investing 1% of federal program funds is continuing to grow. The Administration's FY 2014 budget request would allow the U.S. Secretary of Labor to set-aside 1 percent of funds from all of the Department's major programs for evaluations. It would also allow the U.S. Secretary of Education to set-aside 0.5 percent of funds from all major Department programs except the Pell Grant program for evaluations. The No Child Left Behind Act also currently authorizes the Secretary to reserve up to 0.5 percent of ESEA program funds for evaluations (except Title I, Title III, and other ESEA programs with their own evaluation set-asides). In order to accurately identify the interventions used under federal funding that are producing strong outcomes for students, the Secretary should include a provision in the Administration's FY15 budget request asking for the authority to set-aside 1 percent of federal education program funds for evaluations of promising approaches.

ADMINISTRATIVE POLICY RECOMMENDATIONS

(4) Require all of the Department's competitive grant programs to award up to 5 bonus points to applicants that meet the Secretary's Supplemental Priority #14 and up to 5 bonus points to applicants that meet the Secretary's Supplemental Priority #15

- In December 2010, the Department finalized its "Secretary's Supplemental Priorities" which allow competitive grant programs to award bonus points to applicants to support programs, practices, and strategies designed to build evidence of effectiveness (Priority #14) and to support programs, practices, or strategies for which there is strong or moderate evidence of effectiveness (Priority #15). These priorities were the basis for the amendments to the Education Department General Administrative Regulations, commonly known as "EDGAR," published in August 2013.
- In FY13, the Higher Education Strengthening Institutions Program, which helps postsecondary schools expand their capacity to serve low-income students, established strong or moderate evidence of effectiveness (Priority #15) as an eligibility requirement; the Supporting Effective Educator Development (SEED) Program, which supports national non-profit projects that support teacher or principal training or professional enhancement activities established moderate levels of effectiveness as an eligibility requirement and is awarding 5 points out of 109 to applicants that proposed projects supported by strong evidence of effectiveness ; and the Arts in Education Model Development & Dissemination Program, which supports the enhancement, expansion,

documentation, evaluation, and dissemination of innovative, cohesive models that are based on research, is awarding up to 5 points to applicants that address building evidence (Priority #14) and up to 10 points out of a total of 130 points to applicants that address strong or moderate evidence (Priority #15).

- To increase investments by the Department in practices, policies, and programs with evidence of effectiveness, the Secretary should require all competitive programs to award up to 5 bonus points to applicants that address each of these two priorities.

(5) Issue policy guidance on ‘Supplement not Supplant’ to clarify that Title I schools can invest Title I funds in evidence-based practices, policies, and programs.

The Department should send a letter to all state education agencies by December 31, 2013, making clear that Title I school-wide schools can use their Title I funds to support practices, policies, and programs, that meet the moderate and strong levels of evidence described in the new EDGAR regulations. Too many states and local school districts incorrectly believe that supplement-not-supplant prohibits them from using their Title I funds to allow Title I school-wide schools to implement comprehensive, evidence-based reforms, such as multi-tiered systems of support, improvements to college- and career-ready curricula, or early warning systems for struggling students. Confusion over supplement-not-supplant causes many states and school districts to carry out “defensive spending” practices where funds are spent on what is “safe” in terms of audit risk, rather than on the evidence-based initiatives that would best meet students’ needs.

(6) Exercise ESEA 0.5 percent set-aside authority for funding of evaluations

The No Child Left Behind Act (NCLB) currently allows the Secretary to reserve up to 0.5 percent of Elementary and Secondary Education Act (ESEA) program funds for evaluations (except Title I, Title III, and other ESEA programs with their own evaluation set-asides). The Secretary, however, only used this authority to evaluate four Department programs in FY13. Until the Secretary is authorized to set-aside 1 percent of all program funds for evaluations, we recommend exercising the full 0.5 percent set-aside authority under the No Child Left Behind Act.