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

Dear Secretary Duncan:

Following up on the engaging conversation we had with Emma Vadehra and other senior Department leaders in late June, we are writing on behalf of the sixteen school districts comprising the Large Countywide and Suburban District Consortium to share some ideas that we believe must guide federal policymaking to strengthen the Elementary and Secondary Education Act and the forthcoming waiver renewal guidance. It is of utmost importance that we work together to make sure that all students are expected to achieve at high levels.

We believe Congress must establish a bold, bipartisan vision for public education in the 21st century through the reauthorization of ESEA. In the absence of Congressional action, we understand the need for the Department to renew the ESEA waivers that have been granted to states in order to continue efforts to ensure that all students graduate from high school equipped with the knowledge and skills essential for success in college and career and ready to fully participate in civic life and the global economy.

Waiver renewal should capitalize on the significant progress states have made to date toward achievement of the core waiver principles. This process offers an important opportunity to shift the federal-state-local relationship from one of compliance to a shared commitment to data-driven continuous improvement. Only through a new culture of innovation, evaluation, and continuous improvement will we achieve the student success our country needs. Much of the implementation burden rests with local school districts. Therefore, SEAs must continue to engage with and involve districts in their waiver planning and work to ensure successful, bottom-up implementation. As you develop the principles and requirements for waiver renewal, we encourage you to consider these additional recommendations:

Principle 1 - College and Career Ready Standards and Assessments for All Students

- **States should continuously improve their plans for meeting established college- and career-ready (CCR) goals.** The waiver renewal process should focus on ensuring that state plans reflect the work at hand and the activities yet to be completed, drawing upon lessons learned from implementation and emerging research on deeper learning. The Department should focus its efforts on ensuring that states and districts have the data, feedback loops, and continuous improvement processes that they need to authentically evolve their own work towards college and career readiness for all students.
- **Student learning must be measured by higher-quality, balanced assessments.** We agree with the comments that you made recently with regard to the overemphasis being placed on testing today. We also share the belief that meaningful assessments are a critical part of good teaching and learning—but only if the tests are valid measures of what students know and are able to do and accountability measures are focused on fostering improvement. With so much change happening in education, we need to take the time to get things right and that means reducing the pressure of high-stakes tests. Assessing student performance

and growth should be grounded in the aim to measure the full breadth and depth of state CCR content standards through a smaller number of high-quality summative assessments administered at key transition points and/or through tests that use statistically valid sampling techniques. States and districts should be encouraged to work together to develop and pilot better systems and then be allowed to take those improved systems to scale. Such systems may shift the focus of statewide summative assessments to serve as a check on the quality and consistency of locally developed and administered assessments rather than as the primary measure for accountability.

Principle 2 - State-Developed, Differentiated Systems of Recognition, Accountability, and Support

- **Accountability should drive positive changes in behavior, processes, and culture, while encouraging continuous improvement and innovation.** In this next phase of waiver, the Department has the opportunity to encourage states and districts to pilot new approaches to accountability. Systems must value deep content knowledge in English/language arts, mathematics, science, and history, as well as the ability to apply knowledge through deeper learning skills such as critical thinking, problem solving, and communication. Doing this well will likely require that accountability systems value a broader array of data while also enabling the growth of competency-based systems and the use of performance tasks.
- **Transitions to new assessments must be met with flexibility.** As states and districts transition to new systems of assessment, waivers should allow states flexibility in the use of student growth measures until at least two years of new assessment data are available.

Principle 3 – Effective Instruction and Leadership through Educator Evaluation

- **New approaches to measuring student growth should be considered.** We share the Administration's belief that educator evaluations should be based on multiple measures, including measures of student growth. In our experience, student growth is best assessed through either district-designed assessments, or a combination of state and local measures. As the Illinois model illustrates, it is possible to use high-quality assessments other than or in addition to state summative assessments to gauge student growth. The Department should help states and districts learn from the implementation of such systems to date and make adjustments to continually improve teaching and learning.
- **Evaluation systems must be better connected to rich professional development.** We have a once-in-a-generation opportunity to improve students' education, with new, rigorous standards and the development of stronger curricula and assessments. But to take full advantage of this opportunity, we must build the capacity of our teachers and school leaders and provide the time they need to collaborate, prepare, and grow.

Thank you for carefully considering these high level recommendations. We look forward to continuing this important dialogue and to working together to support students' readiness for success after graduation.

Sincerely,

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