

December 2, 2009

The Honorable Arne Duncan
Secretary
US Department of Education
440 Maryland Avenue SW
Washington, DC 20202



*Excellence and Equity
in Public Education
through School Board
Leadership*

Re: *National School Boards Association Response to Notice of Public Meetings and Request for Input to Gather Technical Expertise Pertaining to a Possible Race to the Top Program; published in the Federal Register on October 23, 2009*

The National School Boards Association (NSBA) representing over 95,000 local school board members through our state school boards associations across the nation is pleased to offer our comments regarding the proposed announcement on competitive federal grants to support a consortia of states regarding jointly developed common assessments. This program, if established, would provide approximately \$350 million, with at least 50 percent of the awards to the states to be used to provide subgrants to local educational agencies (LEAs).

Our comments do not recommend specific systems of assessments, but rather reflect our general thoughts regarding the development of assessments by a consortia of states, the appropriate role of the federal government, and the Department's framework in supporting LEA-level activities that are designed by the state consortium to support the development and implementation of its assessment system.

While NSBA remains strongly opposed to any efforts to develop, encourage, or require a single national assessment for accountability purposes, we do applaud the Department's proposed actions to establish competitive federal grants specifically designed to encourage consortia of states to develop assessments, and your acknowledgment that such efforts are appropriate for the states not the federal government. We concur with your position that the appropriate role for the federal government is to increase incentives to states and LEAs to create constructive remedies, and provide technical support to the states in developing those standards.

We also believe that in establishing incentives for consortia of states, such competitive grants should also be available to individual states. As proposed, a single state with a broad range of academic challenges, a highly diverse student population, and a demonstrated commitment to a high quality system of assessments meeting all requirements for the grants *except for its participation in a consortium* would be ineligible. Further, the size of the consortia should not matter so that those with fewer participating states and those with larger numbers of participating states could compete equally based on the quality of their proposals addressing both alignment with state standards and the rigor of the curricula.

The proposed requirement for states to award at least 50 percent of the awards to LEAs (including public charter schools identified as LEAs under state law) is very encouraging. As you are aware, research continues to indicate that there is strong consensus among states to ensure rigorous standards, strong curricula aligned with those standards, and valid and reliable systems of

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The Honorable Arne Duncan

December 2, 2009

Page 2

assessments that fairly and accurately reflect the performance of students, schools and school districts.

NSBA supports the proposed general framework regarding summative assessments that measure individual student achievement and individual student growth. We also support your position that assessments need not be limited to a single end-of-year assessment but could include multiple summative components administered at different points during the school year. Additionally, NSBA generally supports the proposed required and desired characteristics, recognizing that a system of assessments could be effective without necessarily possessing *all* the characteristics since the system needs to be tailored to the needs of the consortia of the states.

Further, we support the need for active involvement of the LEA in the design of assessment systems, and encourage the Secretary to clarify that the types of activities identified in the Notice are representative, but not necessarily required by every participating LEA. We also recommend that LEA activities should be framed around specific criteria and outcomes rather than administrative processes. As an example, the Notice proposes among the LEA activities, the development of a rollout plan for implementation of the standards and assessments together with all of their supporting components. While this may be appropriate for some LEAs, the role of LEAs could vary widely depending on the specific academic challenges being addressed, the capacity of the LEA and the extent to which LEA funds are invested.

Finally, as the Department develops final criteria and requirements to implement this new competitive grants program to support assessments based on state-developed standards, we urge the Secretary to ensure that such requirements compliment the provisions in the reauthorized *Elementary and Secondary Education Act* (ESEA), and that requirements in this competitive grant program would not become a condition for receipt of grants in programs that are designed for other purposes.

We very much appreciate the opportunity to comment. Questions concerning our comments may be directed to Reginald M. Felton, director of federal relations at 703-838-6782; or by e-mail at rfelton@nsba.org.

Sincerely,



Michael A. Resnick
Associate Executive Director

MAR: rf/kc

G:Adv/Regulations/2009/RTTTAssessments