



A Broader, **BOLDER** Approach to Education
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To: Secretary of Education Arne Duncan

From: Helen Ladd, Pedro Noguera, Tom Payzant

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Campaign

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Dear Secretary Duncan:

When representatives of the Broader, Bolder Approach to Education (BBA) met with you on June 18th to discuss our forthcoming accountability report, you asked for ideas about how ARRA funds might be used to support our recommendations for developing state inspectorate systems for districts and schools. We present a few such ideas below.

In each of these recommendations, we are arguing that the Department of Education use ARRA guidance to “signal” the legitimacy and importance of States’ broadening and increasing the rigor of their measurement and accountability systems by including inspections both for judging school and district performance and facilitating needed improvements. We believe strongly that inspection systems are consistent with all four of ED’s reform priorities and give both the federal government and the states a bridge that spans and integrates each of them, from stimulus funding to beyond. Moreover, sending such a signal gives ED a tool to stimulate the states to craft a number of long-sought missing links regarded as central to improving system and student outcomes: a systematic means to track reform implementation at the level at which students are educated; validation of quantitative measures of student outcomes and the means by which they

were achieved; marrying accountability with school and district improvement; and fostering continuous system and student improvement through the formalization of feedback loops and the institutionalization of capacity building.¹

We cannot emphasize enough how essential it is to foster the development of state, and by extension, local capacity in these ways. It is widely agreed that, rather than increasing, state capacity to act strategically has diminished since the passage of ESEA in 1965. State bureaucracies now typically resemble silos that are more attuned to the separate requirements of federal programs than to the larger education reform picture.

Encouraging states to integrate inspections into their accountability systems can be a uniquely powerful tool to reverse this trend, by focusing attention on the coordinated behaviors needed across programs for meeting the goals that you and the President have declared.

Our foremost recommendation is that this strong signal on behalf of inspectorates be delivered to the states in the guidance for, and awarding of, **Race to the Top (RTTT) funds**. This is ED's signature, ARRA state-level reform initiative, so what the guidance determines to be important for states to attend to will critically shape their responses both to ED's reform priorities and their own. Moreover, encouraging and enabling states to broaden and increase the rigor of their measurement and accountability systems through inspectorates gives them an overarching framework for tying together and leveraging their responses to each of the four priorities. Not insignificantly, it also gives states a robust means to monitor the reform compliance of their districts and schools – and ED an equally strong means for assessing the extent to which the states' RTTT applications represent a real interest in complying with the four assurances and having their districts and schools follow suit: To illustrate a few ways that inspectorate systems can address critical questions related to implementing the four ED priorities:

College- and career-ready standards/high quality assessments: How will states validate the extent to which such standards and assessments, and the aligned curricula, formative assessments and professional development that support them, are being implemented and with what impact? How can they foster adjustments well before small problems cascade into larger ones?

Establishing data systems/using data for improvement: Given their remoteness from districts and schools, how will states know if data are being interpreted and used appropriately, if at all, and whether such uses translate into improved district, school and classroom level practice?

¹Note that these features, as well as the rest of this brief, track with the framing questions for decision making in ED's April 24, 2009 document, "Using ARRA Funds to Drive School Reform and Improvement," and enable those questions to be answered affirmatively.

Improve teacher effectiveness/equitable distribution: ED's April 24th ARRA 2009 document correctly notes that the key to achieving this goal lies in how districts and school leaders "recruit, hire, induct, develop, evaluate, advance, and compensate teachers. Moreover, they can create the school conditions that foster teacher effectiveness and retention such as excellent school leadership, time for collaboration, and a culture of continuous improvement" (p.4) – all also noted in the BBA accountability statement. The document goes on to provide examples of strategies to achieve those ends. Recognizing that the capacity to translate those strategies into effective practice is not widespread, what on-the-ground mechanisms do states have for getting independent, systematic feedback on the quality, progress and impact of district and school leaders' responses? And how will these leaders and staff monitor and improve their efforts?

Turning around lowest-performing schools: Given that determinations of lowest or low-performing schools often shift depending on the metrics of the quantitative accountability system, how will states validate the selection of schools requiring aggressive restructuring or closing? Similarly, the April 24th document (p.7) speaks to districts' developing "a data-driven approach to understanding school performance *and* (emphasis added) the causes of low performance," as well as "closely monitoring results of restructured schools; providing results to school staff, families and communities;" and then using this information for improvements. No exclusively quantitative measurement system is presently able to accomplish these multiple and sophisticated goals on its own. How will states drive a system that can?

Clearly, we believe that using highly trained inspectors along with new standardized measures to validate district and school performance enables states to answer these illustrative questions. We therefore urge that states be strongly encouraged to use RTTT funds to begin developing more robust accountability systems. With such resources states might propose to establish pilot inspectorates in a few districts (perhaps those with the largest percentage of low performing schools) that would include the systematic collection and interpretation of school observation and survey data along with test score information. Or they can offer to develop and implement new standardized metrics and qualitative review procedures for evaluating such student skills as oral expression and problem solving that are currently not measured but are directly relevant to the needs of a 21st century workforce. The important point is that successful state RTTT grantees view a broader and more comprehensive accountability system that includes qualitative indicators of system, school, and student outcomes as integral to their overall leadership reform agenda.

We also recommend that the **data metrics** that ED will soon define for awarding the second phase of ARRA funds to states should encourage them to supplement their quantitative indicators of school and district performance with qualitative measures, which

can best be informed through inspectorate systems. As we understand it, the goal of these metrics is to show how schools and districts perform with respect to the four reform priorities and also to help them improve. Again, direct observations and reporting by trained experts is the ideal way to understand whether/how schools and districts are changing, interpret the meaning of quantitative indicators of student outcomes, distinguish efforts that are working from those that are not, and tailor appropriate improvement strategies. For example, the metrics could include indicators of the quality and rigor of student work as determined by systematic reviews of student portfolio samples, or the safety and orderliness of school environments as gleaned from school visits and disruptive incident data collections.

The result of supplementing quantitative indicators with more qualitative but systematic observations and data collections is twofold: a means to institutionalize capacity building; and a system that marries accountability with its overriding goal, continuous improvement in school and student performance. This desired outcome also drives our recommendation that ARRA grants for enhancing **statewide data systems** encourage the inclusion of data from school and district inspection as system components. While we support continued improvements in the development of longitudinal student and teacher files, the evidence strongly suggests that combining such data with direct validations through state inspection systems would greatly enhance the accuracy and analytic value of these records. Moreover, such integration would permit researchers and practitioners to go beyond “black box” interpretations of school progress, allowing for insights not only about “what is working” or not in reform but also “why.”

Last but not least, we applaud ED’s inclusion of a fifth priority category – **improving results for all students**, including early learning, extended learning time, use of technology, preparation for college/career and school modernization (p.3) -- in its April 24th document, as well as its highlighting, in the lowest-performing school section, the desirability of **academic enrichment and engaging community, social service, and health organizations to better serve students and their families** (p.6). The BBA accountability statement echoes these themes, noting that, “Satisfactory coordination and/or provision of early childhood, out-of-school, summer, educational, health, and social services should be a practice for which districts and schools are accountable, and which inspections should consider.” We therefore recommend that ED underscore its seriousness about implementing these powerful components of positive student outcomes by encouraging states to include them in their statewide data systems and in their district and school data metrics, which would provide a strong incentive to engage in these practices.

To reiterate a point made in the BBA accountability report, we are not arguing that the federal government prescribe the nature of these state inspection systems. That needs to be a state responsibility. Further, we believe that the signal on inspection systems that ED

sends through ARRA guidance should emphasize experimentation, either by states working individually or in state consortia that could include other partners, such as regional accreditation bodies, to name but one example. As we said in our report, educational inspectorates in other nations, as well as regional accreditation systems in this nation and inspection systems in non-education fields, are undergoing constant revision as strengths and weaknesses of existing procedures are revealed. States need to absorb these and related lessons and also have the latitude to contribute to them through their own innovations, which is precisely what an experimental stance would promote. Moreover, through federally sponsored evaluation of these state experiments, all states, as well as the federal government, would have the benefit of learning about the effectiveness of the models developed in the experimental states, which would encourage further uptake and innovation.

We thank you for your invitation to present the above ideas. We have more detailed proposals for how inspection might be initiated through ARRA, including how pilots might be specifically mounted in the context of the low-performing schools priority. We would greatly welcome an opportunity to elaborate on this further with you or your staff.

Respectfully,

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