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November 13, 2017

Ms. Jennifer Bell-Ellwanger
U.S. Department of Education
400 Maryland Avenue SW, Room 6W231
Washington, D.C. 20202

RE: Docket ED-2017-OS-0078

Dear Ms. Bell-Ellwanger,

On behalf of AASA, The School Superintendents Association, representing more than 13,000 public school superintendents across the country, I write in response to the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs ("priorities"). Our comments are premised on equity and the assumption that all of our nation's students—regardless of race, ability, income or zip code—deserve a high quality education and that we as education leaders have a responsibility to ensure that each child and their family have a high-quality education option. Our nation's public schools are the only system positioned to serve and support all families, and it is through that lens that we insist the federal government prioritize its education policy work to strengthen and support public schools before moving into conversation about choice.

AASA is opposed to competitive allocation of federal dollars. AASA's historical position—opposition to continued reliance on competitive funding until flagship federal formula programs like Title I of the Every Student Succeeds Act (ESSA) and the Individuals with Disabilities Education Act (IDEA) are fully funded—applies here, and is usurped only by our stronger opposition to the allocation of federal dollars to support privatization. Continued reliance on competitive allocation is inherently inequitable; creates and reinforces a system of 'winners' and 'losers'; and exacerbates—rather than ameliorates—the resource and achievement gaps that persist for some of our nation's neediest students. We think the premise of targeting these dollars on STEM is appropriate, and could be further improved by allocating those dollars through formula programs—like ESSA Title IV—that already exist and support all schools. While understanding the administration's commitment to supporting successful programs and practices, AASA urges USED to invest in formula grants to provide a more reliable stream of funding to local school districts. Such a strong emphasis on competition implies that competition alone produces innovation and student achievement. School districts and systems need a certain level of financial stability to undertake the ambitious innovation and reform outlined in the proposed priorities, a level of reliability and consistency that cannot be achieved through competitive funding. Formula-driven funding represents the dedicated funding stream that allows school districts to appropriately plan for and invest in innovation and reform. AASA is concerned that competitive grants would have a disproportionate negative impact on rural and small districts. Further, with limited local resources, school districts do not have the time or the capacity to develop extensive competitive grant applications in order to be competitive. This will lead federal dollars away from students in poverty and to districts that have the resources for grant writing teams.

We are concerned that the prioritization of STEM, workforce development, competency-based education, and literacy focus —however well intended—is disingenuous and disconnected from other policy priorities advanced by this administration. We would like to applaud the Secretary’s prioritization of STEM, workforce development, competency-based education, or literacy focus within the competitive pot of funding, but it is disingenuous, given this administration’s stated interest in eliminating the very funding pots that support the exact same priorities in the premier federal K12 policies supporting our nation’s schools, particularly Title IV of ESSA. President Trump has proposed zeroing out both Title II (used for professional development, including for STEM teachers) and Title IV, a flexible funding program with explicit references to the elements the Secretary proposes to prioritize. Prioritizing these policies via competition does not negate the stated policy intent of eliminating the programs that already supports STEM programming in schools.

Existing federal statute provides all schools with the opportunity to address STEM and the proposed priorities. The STEM Education Coalition provides a summary listing¹ the myriad ways ESSA integrates STEM into federal policy. ESSA makes direct connections to STEM in standards and assessments; preparing, training and recruiting high-quality teachers and leaders; and student enrichment activities. ESSA section 2101 provides for alternative certification of STEM educators, helping to address teacher shortages and growing the number and quality of programmatic options that can be available to students. ESSA sections 2101 and 2103 allow for STEM professional development as well as differentiated pay for STEM teachers, critical to ensuring our students have highly effective instructors. Section 2103 strengthens career and technical education, aligned with workforce needs. Section 4101 provides for STEM specialty schools, designed to engage students in rich, purposeful STEM-learning environments. When adequately funded—which it would be if the competitive funds were rolled into ESSA—section 4101 explicitly requires districts to spend at least 20% of their allocation on well-rounded education, which includes activities related to STEM courses, to improving access to STEM programs for underserved and at risk students, and expanding STEM opportunities outside of the classroom. This overlap is an unnecessary redundancy, and the dollars slated for competitive distribution would nearly triple the amount currently available via ESSA formula, and would make a significant and meaningful difference in all schools, not just the ‘winners’.

The proposal glosses over the realities of implementing school programs in rural schools and communities. Many children and their families in rural America need better and more equitable educational opportunities. The challenges students face in many rural places are staggering. Limited access to advanced coursework, medical care, food and employment opportunities, continue to daunt students in many rural communities. Poverty rates are also climbing. In 23 states a majority of rural students are in low-income households; this is a noticeable uptick from 2013 when only 16 states had a majority of rural students who were from low-income families. Virtually all of the gaps that rural schools work to overcome with students—opportunity gap, achievement gap, graduation rate gap—correlate to poverty. Poverty— and the persistence of poverty—directly impacts the ability of children to learn, and the ability of schools to provide educational opportunities. Addressing rural students’ lack of resources can be transformative in ensuring they have an equitable opportunity to succeed. Under the Obama administration, we saw a sustained effort to direct limited federal dollars to new, competitive programs, a trend that this round of funding will continue. This approach negatively and disproportionately impacts rural communities because they lack the capacity or expertise to submit applications. It is not that rural communities are not competitive; rather, it is that they lack the capacity to compete. The proposal acknowledges that rural communities exist—it defines them—but fails to recognize the reality of rural communities and schools and their limitations to even approach, let alone secure, competitive funding.

¹ STEM Education Coalition <http://www.stemedcoalition.org/2015/12/01/coalition-analysis-of-key-stem-provisions-in-esea-act/> (Accessed November 2017)

AASA strongly opposes the Department’s first priority, which uses “educational choice’ as a euphemism to expand its privatization agenda and direct public dollars to private schools. AASA aligns itself with the entirety of comments as submitted by the National Coalition for Public Education, and I have excerpted a particularly relevant section here:

“The Department should not reward states for adopting voucher programs that do not serve all students, fail to improve academic achievement, undermine public education funding, harm religious freedom and lack critical accountability for taxpayers. Instead, the Department of Education’s first priority should be funding, supporting, and strengthening our public schools, where 90% of our students attend.

Evidence-based Models Do Not Support Private School Vouchers: The Secretary’s Proposed Priorities state that the Department intends to support States and districts offering “innovative and, where possible, evidence-based models of educational choice.” Evidence-based models, however, demonstrate that private school vouchers fail students, parents, and taxpayers.

As defined by the Every Student Succeeds Act “evidence-based” activities, strategies and interventions are those that demonstrate “a statistically significant effect on improving student outcomes or other relevant outcomes based on strong . . . , moderate . . . , or promising evidence” from at least one well-designed and well-implemented experimental or quasi-experimental study, or a rationale based on high-quality research findings or a positive evaluation that suggests the intervention is likely to improve outcomes.²

Yet, there is a growing body of evidence demonstrating that private school vouchers fail to improve educational outcomes. Instead, access to private school voucher programs leads to declines in student achievement. Recent studies of the Louisiana,³ Indiana,⁴ Ohio,⁵ and the District of Columbia⁶ voucher programs have revealed that students in voucher programs perform worse academically than their peers. In addition, studies of long-standing voucher programs in Milwaukee⁷ and Cleveland⁸ found that students offered vouchers showed no improvement in reading or math over those not in the program. It is clear that private school voucher programs do not comport with the Department’s priority of promoting evidence-based outcomes.

The Department’s Core Mission Does Not Align with this Priority: The Secretary’s Proposed Priorities state that the Department “will place a renewed focus on our core mission: serving the most vulnerable students, ensuring equal access for all students, protecting their path to a world class education, and empowering local educators to deliver for our students.” The most vulnerable students, as enumerated

² U.S. Dep’t of Educ., [Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments](#) 7 (Sept. 2016).

³ Morgan Winsor, [Louisiana’s Controversial Voucher Program Harms Poor Students, Lowers Grades, New Study Finds](#), Int’l Bus. Times (Jan. 10, 2016).

⁴ R. Joseph Waddington and Mark Berends, Notre Dame’s Center for Research and Educational Opportunity, [Impact of the Indiana Choice Scholarship Program: Achievement Effects for Students in Upper Elementary and Middle School](#) 24 (June 2017).

⁵ David Figlio & Krzysztof Karbownik, Fordham Institute, [Evaluation of Ohio’s EdChoice Scholarship Program: Selection, Competition, and Performance Effects](#) 32 (July 2016).

⁶ U.S. Dep’t of Educ., [Evaluation of the D.C. Scholarship Program: Impacts After One Year](#) 11 (Apr. 2017).

⁷ E.g., Patrick J. Wolf, School Choice Demonstration Project, Univ. of Ark., [The Comprehensive Longitudinal Evaluation of the Milwaukee Parental Choice Program: Summary of Final Reports](#) (Apr. 2010). (Overall, there are no significant achievement gains of voucher students compared to public school students. “When similar MPCP and MPS students are matched and tracked over four years, the achievement growth of MPCP students compared to MPS students is higher in reading but similar in math. The MPCP achievement advantage in reading is only conclusive in 2010-11, the year a high-stakes testing policy was added to the MPCP.”)

⁸ E.g., Jonathan Plucker et al., Center for Evaluation & Education Policy, Univ. of Ind., [Evaluation of the Cleveland Scholarship and Tutoring Program, Technical Report 1998-2004](#) 166 (Feb. 2006).

in Proposed Policy 1, include: students living in rural communities, students with disabilities, students in poverty, students attending schools identified for comprehensive or targeted support, students who are academically far below grade level, English language learners, students from military-connected families, and American Indian students. Unfortunately, decades of reporting and analysis of private school voucher programs across the United States demonstrate that voucher programs do not actually serve these students or ensure them equal access.

We appreciate the opportunity to comment on the Secretary's proposed priorities and urge her to reconsider the allocation to ensure that the focus on STEM, workforce development, competency-based education, and literacy focus is available to all students. Continued reliance on competitive funding is antithetical to equity in education and undermines the nation's commitment to ensuring that all students have access to education and detracts from the federal government's ability to meet its outstanding commitments to historically disadvantaged students through federal flagship programs, like IDEA and Title I.

Sincerely,

A handwritten signature in black ink that reads "Noelle Ellerson Ng". The signature is written in a cursive style with a large, stylized "N" and "Ng" at the end.

Noelle Ellerson Ng
Associate Executive Director, Policy & Advocacy
AASA, The School Superintendents Association