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Comments on Proposed Regulations for Education Stimulus Funds

Docket ID ED-2009-OESE-0006, Race to the Top

I am writing to comment on two key provisions in the Race to the Top Program. Both relate to the selection criteria for grant-making: a) standards and assessment and, c) great teachers and leaders.

- A. Standards and Assessments: If we are to promote vertical alignment of instruction P-20, we must ensure that pre-K is included in the K-12 standards. To date, as a result of Good Start, Grow Smart, states have developed voluntary standards in areas of reading, language arts, and mathematic. In many cases, these ‘guidelines’ are totally disconnected from K-12 standards. Further, many of the standards are poor, and do not adequately align with K-3 requirements. Even more problematic, some states have not included science, and other content areas in their standards. Vertical alignment must include pre-kindergarten standards. Some exemplary state standards that could be used as models of excellent alignment are Oklahoma, Virginia, and Connecticut.
- B. Aligned with quality standards, we need to support developmentally appropriate assessments in pre-kindergarten to ensure quality instruction. Without assessment, there is no accountability on whether or not or the degree to which these standards have been met. To date, practitioners are cobbling together subtests from various standardized measures, or worse, creating measures on their own which do not have validity or reliability. If we are serious about vertical alignment, then we need to assess whether pre-k standards have been met through quality assessments.
- C. Great Teachers and Leaders: (C) (2) Although the goal is laudatory, I strongly object to differentiating teacher and principal effectiveness based on performance. While it is clear that we need to promote quality teaching, these guidelines may have serious unintended consequences. There are several key issues that are extremely problematic:
- a. To date, there is insufficient evidence to suggest that ‘value added’ models or multiple rating systems provide valid and reliable information on ‘quality teaching.’ Currently, we simply do not have models of ‘rigorous and transparent procedures’ that could accurately link gains with quality teaching. Without accurate, valid and reliable mechanisms, we run the risk of losing an extraordinary number of new teachers who might be or become excellent teachers.

It will also almost guarantee a troubling trend in our schools today: a focus on reading and math with little attention to content instruction. Two

evaluations, Early Reading First, and Reading First, have shown that a narrow focus on reading without rich content learning in science, geography, history, art, will not significantly enhance children's achievement. We need to ensure that children are given rich instruction. Linking teacher quality to these very rudimentary skills, measuring reading and math only, will ignore the fact that domain specific knowledge is essential for achievement both in elementary school and high school.

- b. Tying decisions about teacher quality to performance could provide a disincentive to working in hard to staff schools. Further, it might exacerbate the already troubling efforts to maintain staff in these schools. Those who might plan to enter the teaching profession temporarily might be more inclined toward these schools; while those who see teaching as their profession would move to less difficult to teach schools. These trends could place more of our disadvantaged children at risk of poor or inexperienced teaching than ever before.
- c. These guidelines seem targeted to elementary school teachers. It is unclear how middle school and high school teachers will be measured by performance (and on what assessments); further, it is unclear how special education teachers and reading teachers will be measured.
- d. Teachers work on the basis of incentives, rather than disincentives. It would be wiser to focus on guidelines that ensured teacher decision-making; quality professional development; smaller classes; smaller teacher-child ratios in hard to staff schools; and quality improvements in facilities. Compensation might be appreciated but even more important are the conditions of schooling which allow teachers to be successful or not. These guidelines place undue emphasis on teachers as the agent of change without any regard for what might make teachers more effective. As documented in numerous papers and research, it becomes difficult to do the job when there are no books, no desks, no paper, and no pencils.

These guidelines, to date, seem like a grand and very expensive experiment, with little research or experiential evidence to suggest that it will work. Having experienced the last eight years in attempting to improve quality teaching without evidence, we need to support innovation and research before resorting to these new federal efforts.

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