



## JOBS FOR THE FUTURE

**January 21, 2016**

The Honorable John King  
Acting Secretary  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington DC 20202

Attention: Ms. Deborah Spitz  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington DC 20202

**Re: Request for Information ED-2015-OESE-0130:Implementing Programs under Title I of the Elementary and Secondary Education Act**

Dear Dr. King:

Jobs for the Future (JFF), a national nonprofit organization that works to ensure that all underprepared young people and adults have the skills and credentials needed to succeed in the U.S. economy, is pleased to respond to the Department of Education's (ED) Request for Information (RFI) ED-2015-OESE-0130. At this initial stage of the regulatory process, our response is focused on two issues that are very important to JFF addressed in the Every Student Succeeds Act (ESSA):

- Assessment and its impact on student success
- Early college high schools, an evidence-based model for helping traditionally underserved high school students successfully transition to and complete the postsecondary education coursework and attain the credentials that are necessary in today's economy.

As referenced in the RFI, the enactment of the Every Student Succeeds Act will advance equity and opportunity in the nation's K-12 education system, based in large part on states' actions to: hold all students to high academic standards that prepare them for success in college and careers; and ensure that states and LEAs implement evidence-based interventions if students do fall behind—especially focusing on the lowest-performing schools and subgroups of students. It is therefore critical that states and LEAs have

effective assessment systems and evidence-based models at the ready for measuring and ensuring student success.

**Assessment.** JFF has joined with the Alliance for Excellent Education and the Learning Policy Institute (LPI) in a shared commitment to ensuring that all students have the opportunity to develop the full range of knowledge and skills necessary for success in college, careers, and life. In a separate letter submitted with the Alliance and LPI, we provide recommendations to the Department for ensuring that states implement high-quality systems of assessments that measure the full range of challenging state academic standards, including higher-order thinking skills and “deeper learning” outcomes that include “mastering core academic content, thinking critically and solving complex problems, working collaboratively, communicating effectively, and being self-directed in one’s learning and having a strong academic mindset.”

Following are the specific recommendations (from the joint letter) that pertain to assessment, encouraging the Department to:

- Define the requirements for **high-quality assessments** as: assessments that measure critical thinking, complex problem solving, and depth of knowledge skills, consistent with the criteria the Department has already published for assessment peer reviews.
- Clarify how **portfolios, projects, or extended performance tasks** can be incorporated into state assessment systems while complying with the statutory requirement for states to implement the “same” statewide assessment. As is true for standardized tests that are adaptive or use multiple forms, the “same” assessments should be defined as those that measure the same standards in ways that can be evaluated using common criteria to determine levels of performance.
- Prioritize the measurement of **deeper learning skills** in the 7-state assessment and accountability pilot; and further clarify that these innovative assessment pilots can be phased in over time rather than being fully operational during the first year of the pilot.
- Regulate that **state assessment audits** be designed to help states and districts not only reduce assessment burden but also build high-quality *systems* of assessment. Such systems can more effectively measure the full range of deeper learning knowledge and skills and reduce burden by eliminating assessments that are low quality, duplicative, or misaligned with college-and career-ready expectations. To assure that higher order skills can be appropriately measured, calculations of time spent on testing should exempt the time spent on in-depth performance tasks and portfolios, which are typically embedded in the curriculum and part of the instructional process.

**Early college high schools.** One of the strengths of ESSA is its emphasis on preparing students to be college and career ready, and its use of early college high schools and dual or concurrent enrollment models to accelerate students’ learning and to facilitate effective transitions for students from high school to postsecondary education. ESSA also

encourages states and local school districts to provide professional development to teachers, school and district leaders, and others to prepare them to educate students in early college settings. As states become more responsible for program designs and outcomes that are related to college and career readiness, states and local school districts will be looking for evidence-based strategies and program designs with success in serving underserved and underprepared populations.

The inclusion of a definition for early college high schools in ESSA is critical—as it describes the fundamental components of early college initiatives, for the first time, in the ESEA statute. As with most statutory definitions, however, it is minimal. JFF encourages the Department to provide to states and local school districts, as part of its guidance for ESSA, a more robust definition of what we know makes the early college model uniquely successful in helping underrepresented students graduate from high school ready for college and careers. We urge the Department to provide information to state and local school systems on the key characteristics of successful early college initiatives, should they want to develop and implement these initiatives. Following are key early college characteristics that should be encouraged.

- **Aligned curricula and instruction:** A coherent instructional framework aligned to college-ready standards, with consistent instructional practices across all content areas, establishes a strong college-going culture and prepares students for postsecondary success.
- **Personalization and student supports:** Student-centered learning environments promote personalization, engagement, and close relationships among students and staff, with assistance based on assessments that identify the needs of each individual.
- **Power of place:** Early college schools are located on college campuses or draw on nearby college campus environments to enable high school students to experience real college coursework and build their identity as college goers.
- **College credit:** Students simultaneously earn a high school diploma and up to two years of transferrable college credit—tuition free.
- **Partnerships:** Strong partnerships with colleges foster shared responsibility for student success, with collaboration on the development of academic programs that meet secondary and postsecondary standards and provide appropriate student supports.

JFF thanks you for the opportunity to provide input at this early stage in the implementation of ESSA. We look forward to continued engagement with the Department as you develop regulations, further guidance, and other supports for the system in support of implementation of the Every Student Succeeds Act.