

January 21, 2016

The Honorable John King  
Secretary-Designate  
United States Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Dear Secretary-Designate King,

On behalf of the Connecticut Coalition for Achievement Now (ConnCAN), I am grateful for the opportunity to submit this public commentary on the Every Student Succeeds Act (ESSA). ConnCAN is a non-profit education advocacy organization leading a movement to improve educational outcomes for Connecticut's children. We believe that all students deserve a quality education that will prepare them for lifelong opportunity and success, regardless of family income, race, or zip code. Over the last 10 years, we have worked to change state policy to achieve that goal, close our state's worst-in-the-nation achievement gaps and ensure that all children have the knowledge and skills they need to be ready for college and career.

We have made some progress in recent years but, as you know, we still have a long way to go. We are grateful for the opportunity to provide this public commentary in response to the Department's request for advice and recommendations from interested parties involved with the implementation and operation of programs under Title I concerning topics for which regulations or nonregulatory guidance may be necessary or helpful as states and local education agencies (LEAs) transition from NCLB and implement the ESSA. We provide these comments in order to ensure that our state gets critical guidance and support needed to continue and accelerate efforts to ensure that all students have access to a great public education. As your office considers the rulemaking process for the Every Student Succeeds Act, we recommend the following:

- **Standards:** State standards must remain high, rigorous, and aligned to college and career readiness expectations so that students will be ready for postsecondary success, including higher education. We recommend guidance to ensure that state standards are high and aligned to entry requirements for credit-bearing courses in the states' systems of higher education and relevant career and technical education standards.
- **Accountability:** State accountability systems must be comprehensive, robust and aligned to challenging and high standards, must provide publicly accessible and transparent information about school and district performance, and must identify our highest needs schools and districts. We recommend guidance to help states identify robust and aggressive but achievable goals, as well as guidance on how states may use funds under school improvement to target our highest needs schools and students and ensure that interventions are evidence-based and bold enough to dramatically improve student outcomes.

- **Assessments:** We are encouraged that ESSA maintains annual statewide testing to ensure that we receive valid, reliable data on how all students are progressing towards high standards. With the new law, we recommend guidance on the flexibility for the high school assessment option and the innovative assessment pilot to ensure that reasonable safeguards are in place to ensure that assessments are rigorous, valid, comparable, evidence-based, and aligned to statewide tests.

## Standards

On July 7, 2010, the Connecticut State Board of Education (SBE) unanimously approved the adoption of the Common Core State Standards (CCSS) for English language arts and mathematics.<sup>1</sup> The majority of Connecticut's educators and leaders remain committed to these standards because we know that they will help ensure students are prepared to achieve their goals, whether students choose to enter college or the workforce after high school.

As the Department considers rulemaking around this important topic, we urge you to continue to support implementation of challenging, high-quality academic standards for all students, and **we recommend guidance on how states can ensure that standards are high and aligned to entry requirements for credit-bearing courses in the state's system of higher education and relevant career and technical education standards.** We must not delay or retract from these high standards and aligned assessments because these standards help ensure that all our children, no matter their neighborhood or background, have access to the world-class education they deserve.

## Accountability

Connecticut has made some progress through the introduction of school and district performance indices by integrating all tested subjects, measuring student growth across performance bands, classifying schools, and identifying achievement gaps across student groups. Many states, however, are currently revisiting or considering revising their school and district accountability systems, and Connecticut anticipates soon releasing a new accountability system that will include academic achievement as well as achievement growth and additional academic and non-academic indicators (such as graduation rates).

While we look forward to the results from our state's new and more balanced approach to accountability, we must ensure that this new system appropriately targets and addresses student achievement growth for all students, identifies and targets low-performing schools and districts in need of support and addresses our state's large achievement gaps. We must also ensure that the information from the system is publicly accessible and available to inform parents, communities and policymakers.

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<sup>1</sup> See Executive Order No. 41, Mar. 11, 2014, *available at* [http://www.governor.ct.gov/malloy/lib/malloy/EO\\_41\\_Educators\\_Common\\_Core\\_Implementation\\_Taskforce.pdf](http://www.governor.ct.gov/malloy/lib/malloy/EO_41_Educators_Common_Core_Implementation_Taskforce.pdf).

As Connecticut and other states look to revise their accountability systems to ensure ESSA compliance in the coming year, **we recommend guidance to help states identify robust and aggressive but achievable goals**, as well as examples (not exhaustive or exclusive) of non-academic indicators in addition to assessment scores and high school graduation rates that will inform, rather than mask, outcomes.

Additionally, while ESSA affords states with an important opportunity to take further control over how to improve the educational outcomes for students from our most vulnerable and traditionally underserved communities, we urge the Department to consider how it will guide states on how they may innovate and use flexibilities under the new law to improve our education system. **We recommend guidance on how states may use funds under school improvement**, including examples of appropriate, robust and evidence-based interventions for the lowest performing schools or schools with underperforming groups of students.

### Assessments

We are encouraged to see that the ESSA maintains requirements for annual statewide assessment in grades 3 through 8 in reading and math, and for science once in grades 3-5, 6-9, and 10-12, and maintains reporting of the 95% participation rate. Assessments provide a key guidepost for understanding how well all of our students are being prepared to succeed in college and for the jobs of tomorrow. This data is essential to identifying and intervening for students that are falling behind, understanding what works, and determining whether our significant investments in education are delivering results for kids. 2016 marks the second full operational year<sup>2</sup> that Connecticut will administer the Smarter Balanced assessment in grades 3-8, and will be the first year that high school students throughout the state will take the SAT in place of the Smarter Balanced assessment<sup>3</sup>. Annual, standards-based assessments are a critical step in making sure all of Connecticut's students receive access to the high-quality public education they deserve and are prepared for college and careers.

As the Department considers how states will annually assess their students and look to implementation of the new innovative assessment pilot available under the new law, **we recommend guidance on the flexibility afforded under the high school assessment option and the innovative assessment pilot to ensure that reasonable safeguards are in place to ensure that assessments are rigorous, valid, comparable, evidence-based, and aligned to statewide standards**. We owe it to our children to ensure they have the opportunity to succeed, and tests help identify how to make that a reality, and a robust accountability system will provide the necessary tools to help us get there.

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<sup>2</sup> This count does not include the 2013-2014 Smarter Balanced field test year. See Conn. State Dep. of Educ., <http://www.sde.ct.gov/sde/site/default.asp>.

<sup>3</sup> See Conn. State Dept. of Educ., [http://portal.ct.gov/Departments\\_and\\_Agencies/Office\\_of\\_the\\_Governor/Press\\_Room/Press\\_Releases/2015/09-2015/Gov\\_Malloy\\_Commissioner\\_Wentzell\\_Senator\\_Bye\\_Representative\\_Fleischmann\\_Reaffirm\\_State\\_s\\_Commitment\\_to\\_Reduce\\_Testing\\_Focus\\_on\\_College\\_Readin](http://portal.ct.gov/Departments_and_Agencies/Office_of_the_Governor/Press_Room/Press_Releases/2015/09-2015/Gov_Malloy_Commissioner_Wentzell_Senator_Bye_Representative_Fleischmann_Reaffirm_State_s_Commitment_to_Reduce_Testing_Focus_on_College_Readin).

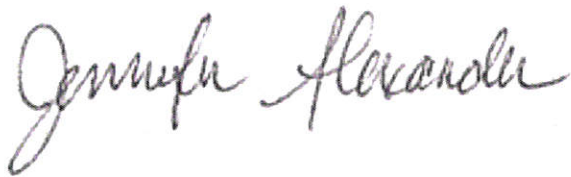
## Conclusion

The Every Student Succeeds Act (ESSA) presents an opportunity to continue the progress that we have made and do more to improve our schools so that our communities, our state and our country can enjoy a prosperous economic future. With yawning academic achievement gaps and many of our students attending chronically underperforming schools in Connecticut and across the country, we can and must do more.

Turning this around will require our local, state and national leaders to unite around bold and proactive solutions. We need you and other leaders to build upon the progress made. As you establish rules and regulations around the ESSA, we urge you to maintain challenging and high standards for all students, ensure high-quality, valid and reliable annual statewide assessments, and implement comprehensive and robust school and district accountability and performance systems that help identify and improve our highest need schools and districts.

In considering this public commentary and next steps, we urge the Department to enact the needed change to ensure that all students - in Connecticut and across the nation - receive the great education they need and deserve.

Respectfully,



Jennifer Alexander  
CEO, ConnCAN