Recommendations to Strengthen the Impact of the Every Student Succeeds Act

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The Educational Policy Improvement Center (EPIC)

EPIC is an education policy and research organization with offices in Eugene and Portland, Oregon. Our work focuses on improving student success and is based on the pioneering efforts of Dr. David Conley, well known among educators for his Four Keys to College and Career Readiness.

EPIC appreciates and applauds the work that has gone into crafting and passing the Every Student Succeeds Act (ESSA), which we view as an important step forward for public education. The law promises significant federal programs for Oregon students.

EPIC's Focus Regarding ESSA

EPIC's CEO, Dr. Matt Coleman, submitted comments in January 2016 to the U. S. Secretary of Education about how the new ESSA law might best be implemented. We know that others have joined us in expressing similar concerns, specifically Bellevue Community College and Green River Community College representatives have met recently with Senator Murray's staff to ask for attention to the issue that we have raised about evidence-based practice.

We are focused on portions of ESSA related to our areas of expertise, which are curriculum alignment, the transition from high school to college, and postsecondary readiness.

Importantly, at EPIC, we focus on the implementation of standards (set at any level) as they are essential to academic coherence, and we very much agree with the guidelines from the National Research Council regarding Next Generation Science Standards, finding that they are applicable to all curricula when it comes to issues of ensuring coherence and alignment. Our CEO referenced that in his January 2016 letter to the Secretary of Education.

Our concerns about ESSA focus on adding more specificity to definitions in the ESSA law in order to help schools as the law is implemented and ensure a higher level of impact for student success.

While some of this may be able to be achieved through the Department of Education's regulatory process (and we will continue to pursue that avenue), it would also be helpful if this specificity could be addressed during any upcoming technical amendments to ESSA. We would like to suggest that the Congress consider this when the opportunity arises. Similar language would also be helpful as Congress crafts the Higher Education Act reauthorizing legislation.

EPIC's Three Specific Recommendations

Specifically, when amendments are offered to ESSA, if the Department of Education has not taken steps to address these three issues in its regulatory process, we would urge Congress to consider three additions:

1. **Further defining a "well-rounded program of instruction."**
2. **Further defining "postsecondary readiness."**
3. **Clarifying that all forms of evidence mentioned in the law may be used to support the use of ESSA funds.**

A discussion of the rationale for each recommendation follows.

1. Further defining a "well-rounded program of instruction."

Section 1112 of the ESSA law calls for developing and implementing a *well-rounded* program of instruction to meet the academic needs of all students. Similarly, in Section 1008, the law calls on educators to "use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide *an enriched and accelerated curriculum*, which may include programs, activities, and courses necessary to provide a *well-rounded* education." (Emphasis added.)

It should be recognized that a well-rounded program of instruction, in the spirit of the recommendations of the National Research Council cited above, is one that, among its other attributes, features a curriculum that is coherent and aligned. It would be helpful if the ESSA law and the Department were to define the term in that manner, using the words "coherent and aligned," so that States and LEA's would focus on ensuring that well-rounded programs, in fact, center on aligned, coherent curricula.

This means that "well-rounded" would describe more than the breadth of the curriculum and its inclusion of many disciplines and perspectives, but also its alignment in support of student progress in any discipline of the student's choice as he or she moves from one level to the next and ultimately into a career.

Alignment and coherence are critical attributes of well-rounded curricula and educational programs. A well-rounded curriculum in the STEAM disciplines (Science, Technology, Engineering, Arts, and Mathematics) would enable students to not only study and master STEAM disciplines at each level but would also prepare the student to pursue any STEAM major or field at each succeeding level. A curriculum that lacks coherency and alignment effectively closes the door on higher learning opportunities and thus could hardly be considered well-rounded.

Being well-rounded is a means to the federal legislation's ends of equity and opportunity, as the Secretary has made clear are the former ESEA's legacy.

2. <u>Further defining "postsecondary readiness."</u>

In Section 1111 of ESSA, several measures are provided that may be included in State Plans, and the states also are given the option of adding their own measures ("any other indicator the State chooses that meets the requirements of this clause."). Among the suggested measures in the law is "postsecondary readiness."

EPIC offers a definition of postsecondary readiness that might be used to guide the work of states and LEA's:

> *Postsecondary readiness means that a student can qualify for and succeed in entry-level, credit-bearing postsecondary courses without the need for remedial or developmental coursework.*
>
> *Postsecondary readiness depends on and results from K-12 curricula that are coherent and aligned with entry-level postsecondary curricula. In other words, if the student is to be ready for postsecondary work, the curriculum must be aligned to ensure a smooth transition and student success.*

It is far too easy to attribute a lack of postsecondary readiness to students who somehow stray off path, or even to harbor the belief that some students are just not "college material," when in fact, the path itself is disjointed, putting the onus on the student to make relevant academic connections from course to course. High school graduates have the capacity to learn at the postsecondary level, and the curriculum is a major contributor to their readiness, based on the extent of its coherence and alignment.

This suggested definition is consonant with the recommendations in <u>The Guide to Implementing the Next Generation Science Standards</u>, issued in 2015 by the National Research Council, which states that:

> To achieve (coherence) takes planning, political will, professional time, and ongoing management. Leaders need to ensure that those responsible for different components or for different grade levels have the responsibility, opportunity, and authority to work together, rather than each moving ahead in isolation. ***At each school level or grade level within a school, those responsible for planning and implementing changes need to be aware of what changes are planned and what have already occurred in the earlier grades and also of what will be expected of the students in later grades.*** (Emphasis added.) (Available at http://nap.edu/18802)

Engaging in the intentional work of curriculum alignment builds a foundation for collaborative partnerships that cross education system boundaries. If States opt to add other measures to State Plans, as ESSA allows, a measure of degree of demonstrated curriculum alignment would be helpful in supporting student success and eliminating achievement gaps that can occur at different schools.

3. <u>Clarifying that all forms of evidence mentioned in the law may be used to support the use of ESSA funds.</u>

The ESSA law takes an important step in defining what constitutes evidence. In Section 8101 of the Act, a definition of "evidence based" is provided, as follows:

> . . . the term 'evidence-based', when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that ''(i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on— ''(I) strong evidence from at least 1 well designed and well-implemented experimental study; ''(II) moderate evidence from at least 1 well designed and well-implemented quasi-experimental study; or ''(III) promising evidence from at least 1 well designed and well-implemented correlational study with statistical controls for selection bias; or ''(ii)(I) demonstrates a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and ''(II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

The ESSA law also states that States and Local Education Agencies may use ESSA funding to carry out "activities that are evidence-based, **to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available . . ."** (emphasis added)**.**

The Congress could assist by ensuring that the law makes clear that the U. S. Department of Education should accept evidence from grant applicants that meets either (i) or (ii) in section 8108, as cited above.

This is especially important since some of the practices recommended by leading national authorities, such as the National Research Council which has issues guidelines for the implementation of the Next Generation Science Standards, and such as the U. S. Department of Education's own Institute for Education Sciences which issues practice guides, have few research studies that currently meet the conditions in section (i) above. Where research in line with section (i) has not taken place or has not been documented, it takes time, often many years, to carry out and document, delaying the time when practitioners can build plans around research that meets the standards of evidence required for inclusion in the Database.

This is also consonant with the full range of research supported by and described in research study guidelines issued jointly in 2013 by the National Science Foundation and the U. S. Department of Education's Institute for Education Sciences. (http://ies.ed.gov/pdf/CommonGuidelines.pdf).

In those guidelines, the two agencies note, on page 8:

> Ultimately, these expectations should advance knowledge by asking neither too little nor too much of proposed studies. Too little can be asked of a study when it is not adequately justified or carefully designed to generate good evidence. Too much can be asked when the role of a particular kind of study in evidence generation is unclear. **For example, a project about design and development of an intervention should not be required to provide strong evidence of effectiveness among a wide range of populations.** If an opportunity for such integration of research purposes occurs, it may be advisable to pursue; however**, it also is acceptable for a design and development project to stop short of conducting an efficacy study. . . .**
>
> Most simply, the six types of research described in this document form a "pipeline" of evidence that begins with basic and exploratory research, moves to design and development of interventions or strategies, and, for interventions or strategies with initial promise, results in examination of the effectiveness for improving learning or another related education outcome. However, as we describe later in this document, the reality of scientific investigation is more complicated, less orderly, and less linear than such a "pipeline" suggests.

As the passage above indicates, the *Common Guidelines* adopt a nuanced and practical approach to evidence. For example, the *Common Guidelines'* definition of "Design and Development Research" (page 20) does not require projects to meet What Works Clearinghouse strong, moderate or promising evidence standards, which – in that document – apply to impact studies of well-developed interventions.

It would appear to be contradictory for the Department to require K-12 ESSA grant applicants to locate studies that meet the more narrow What Works Clearinghouse evidence standards, in order to support their chosen project design, while at the same time, acknowledging, along with NSF, the fuller range of evidence that is being produced, much of which does not meet the What Works Clearinghouse evidence standards at this stage, but nonetheless is useful and can lead to improvements in student success, as attested by positive evaluations by highly-regarded experts.

Therefore, the Congress might clarify that as the Department of Education makes grant awards under ESSA and as States and LEAs create plans, the full definition of evidence-based studies contained in the law should be followed, including both sections (i) and (ii), and that grantees be allowed to base their work on well-designed studies as defined in section (i) above, as well as on section (ii), "a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes . . ." as the law states.

Giving equal weight to section (ii) of the definition would appropriately open the door to schools to rely on the reports and principles set forward by the Institute for Education Sciences and the National Research Council, for example, that are a result of experts' "positive evaluation" of effective practice, but that may not have yet have evidence based on research that shows a statistically significant effect, as alternative (i) in the definition provides. This will hasten the adoption of good practice and improved results for students.

Impact of these Recommendations on Other Education Legislation

As the Members of the House Education and Workforce Committee proceed with plans to reauthorize the Higher Education Act in the months ahead, we would suggest that any language in the HEA that speaks to evidence should mirror the language in the ESSA, supporting important partnership efforts to create pathways for students, and enabling higher education and K-12 partners to seek and use the same sources of evidence of effectiveness.

Impact on Oregon Schools' Competitiveness for Federal Education Grants

Increasingly, the U. S. Department of Education has been either requiring or awarding competitive priority points in some grant competitions based on using evidence that meets the standards of the What Works Clearinghouse database. It would be ideal for the Department to also allow evidence that meets the second part of the definition provided by the Congress in ESSA, as excerpted above.

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