

**NALEO EDUCATION LEADERSHIP INITIATIVE (NELI) NATIONAL TASK FORCE**

November 13, 2009

Honorable Arne Duncan  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 7W311  
Washington, DC 20202

Dear Secretary Duncan:

As co-chairs of the NALEO Education Leadership Initiative (NELI) National Task Force on Education, we would like to commend you for your leadership in proposing significant education reforms and innovative program initiatives intended to address many of the critical challenges our schools are facing. We applaud the significant federal investments that the \$4.35 billion Race to the Top (RTT) program represents to direct important future school improvements in four key areas: standards and assessments, teacher effectiveness, data systems improvements, and turning around low-performing schools.

As a coalition of Latino elected officials representing twelve states, we believe that Latino students will certainly benefit from these school improvements as our public schools seek to prepare students for success in college and the work place. We are pleased that the Department revised the RTT program requirements in response to extensive public commentary. However, we are writing to express our concerns regarding the absence of specific requirements that focus on meeting the unique needs of Latino students and English language Learners (ELLs), in particular. Certainly, students of the nation's second largest school district, Los Angeles Unified School District, where close to *one in two* students are English Language Learners and 94% of students are Spanish speakers could benefit significantly from a greater emphasis of ELLs required of states.

We firmly believe that educational challenges impacting Latino students in urban, suburban, rural and emerging communities must be addressed more prominently as a central part of the Department's national education reform initiatives. The Administration cannot expect to meet its national education goals by 2020 without incorporating the needs of the nation's Latino students more strategically. Therefore, we stand ready to work with you and the Department of Education to help advance your current efforts to serve Latino students. Attached to this letter, we are submitting comments in specific reform areas in which we urge the Department's attention.

We would appreciate the opportunity to discuss how we can work together more closely to enhance the Department of Education's current reform efforts to ensure that Latino student achievement is a more central focus of the national education reform agenda.

Sincerely,  
NELI National Task Force Co-Chairs



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cc: Carmel Martin, Assistant Secretary for Planning, Evaluation, and Policy Development  
Thelma Meléndez, Assistant Secretary for Elementary and Secondary Education  
Joanne Weiss, Senior Advisor to the Secretary and Director, Race to the Top  
Marshall S. Smith, Senior Counselor to the Secretary, Director, International Affairs

## **NALEO EDUCATION LEADERSHIP INITIATIVE (NELI) NATIONAL TASK FORCE**

### **COMMENTS ON THE DEPARTMENT OF EDUCATION'S RACE TO THE TOP PROGRAM AND OTHER REFORM INITIATIVES**

This letter provides comments by the National NALEO Education Leadership Initiative (NELI) Task Force concerning the Department's Race to the Top (RTT) program and other proposed education reforms and funding initiatives.

The National Task Force on Education was established at the September 2009 NALEO – NELI Education Summit in Washington, D.C., bringing together state and local elected and appointed Latino leaders to address the educational challenges impacting Latino students throughout the nation. In view of the important funding and reform initiatives being promulgated by the U.S. Department of Education and the upcoming reauthorization of the Elementary and Secondary School Act, the Task Force recognizes the urgent need for playing a stronger advocacy role for Latino children and youth along the education pipeline. Although the Task Force was unable to submit comments to the initial proposed requirements for the RTT program, it decided to communicate by letter directly with the Department to underline the urgency of addressing the critical, unmet needs of Latino students. The Task Force's comments reflect the consensus of its members and are based on their collective experience, knowledge, and commitment representing Latinos living in urban, suburban, rural and emerging communities throughout the United States.

Because the RTT funds represent a significant opportunity for promoting needed changes in the nation's public schools, particularly those serving high-poverty, high-risk Latino students, the Task Force has attempted to identify possible "missed opportunities" for improving Latino student achievement. In this regard, the comments provided below summarize the Task Force's concerns regarding RTT program scope, focus, and requirements, including the Innovation Funds and the use of NAEP scores to evaluate RTT outcomes. The Task Force also underscores its specific concerns about two core areas for Latino student success that do not appear to be an integral part of current Departmental initiatives: English Language Learners (ELLs) and Parental Involvement programs. The Task Force urges the Department to consider more effective ways of addressing these concerns as it moves toward the full implementation of the RTT program and other reform initiatives.

#### **SPECIFIC COMMENTS—**

**Race-To-The-Top Program**— Because of the historic nature of the educational investment that this initiative represents, we believe that Race to the Top grant requirements for States and school districts must be clarified and expanded to:

- Ensure the development of assessments, standards, and best practices that demonstrate consideration of the impact of socioeconomic status, language development, and culture on Latino student learning;
- Encourage greater use of multiple measures, more flexibility in use of "hybrid" assessments that allow for formative assessments that are culturally and linguistically appropriate;
- Provide grant funding to states that will work with state education departments, universities and local districts to develop and refine statewide standards and assessments for ELLs, former ELLs, and students living in homes where a language other than English is spoken;
- Direct State agencies and LEA's to include ELL students as an integral component of all of their reform initiatives and to develop valid and inclusive accountability measures to eliminate the practice of exclusion of ELLs in school, district, and state-wide assessments;

- Reward potential state grantees for current multi-lingual competencies and practice; the nation should not consider English learners as unique and different, but rather as an asset;
- Ensure development of longitudinal data systems inclusive of current and former ELL students;
- Require states to develop and implement innovative differentiated instructional practices and appropriate interventions for Latino students in low-performing schools.

**Using NAEP as a Measure of RTT Outcomes** – We are pleased that the Department will use multiple measures to evaluate RTT outcomes, in addition to NAEP scores. We understand the need to measure reform outcomes across RTT grantees in various states; however, we have concerns about the predominant use of NAEP scores as an appropriate and valid indicator of student achievement in general, and ELL student progress in particular. NAEP scores report achievement at the school system level, and not at the individual student level, thus limiting its use to improve instruction and learning for individual students. Furthermore, current NAEP state-wide data reports confirm that ELL students are generally *not* included as an integral subgroup in a school’s NAEP student sample. We urge that validated, student-focused achievement assessment be developed by states and research entities (i.e. universities, schools of education) for measuring RTT grantee performance.

**Targeting Innovation Funds** – We believe that the Innovation (i3) Funds can provide unprecedented opportunities to address critical Latino student needs by targeting preK-16 achievement and closing achievement gaps, decreasing dropout rates, increasing high school graduation rates, increasing college readiness, and improving teacher effectiveness. However, by limiting RTT program eligibility to those local education agencies (LEAs) that have already significantly closed achievement gaps between groups of students, those LEAs with greatest educational disparities will have limited incentives to change what they are currently doing that leads to disparate outcomes. Furthermore, by not targeting these funds to the elimination of specific linguistic and cultural barriers Latino students and their families face, too many Latino students will continue to be marginalized, set apart as low achievers, and thus critically underserved. LEAs must clearly demonstrate commitment of RTT resources to Latino students, e.g., ensuring more effective instruction and highly qualified teachers for ELL and former ELL students, increasing Latino graduation rates and developing more appropriate interventions for Latino student dropouts. To help target funds and initiatives on the needs of ELLs, the Task Force fully supports the recommendation regarding ARRA and ELLs that was submitted by members of the ELL Working Group on March 20, 2009, urging the Department to incorporate a greater focus on the growing population of English learners.

**Parental and Family Engagement: Innovation Fund** – Additionally, parental and family engagement should be considered as a separate category within the i3 funds to improve avenues for engaging parents in their children’s education. We urge the Department of Education to consider directing funding for the following recommendations related to strengthening parental engagement as outlined by the national ELL working group:

- Funds could be used to evaluate family literacy programs and to design and implement quality standards and enhancements that focus on the development of English literacy, English language, and parent-child reading activities. Strengthening existing community-based family literacy centers and targeting resources to districts with high number of students who speak a language other than English in their homes could be part of this effort as well.
- Funds could be used to add and prepare staff fluent in the languages spoken in the local community to act as community liaisons. Their role would be to improve communication between the school and the community, increase parental involvement, and help broker school- and family-related services for students and their families.

- Support programs that systematically train immigrant parents to advocate for their children in school, monitor homework, monitor coursework, and prepare them for high school graduation and college (i.e., *Padres Promotores* of Santa Ana Community College and *Padres Adelante* of UC Santa Barbara).

### **The Office of English Language Acquisition (OELA) and Title III**

During a critical period leading to the design, development, and implementation of the Race to the Top and Innovation grants programs, the Department has not counted on a high-level advocate for ELL students and their unique educational challenges. We are therefore quite concerned about the delay in the appointment of a qualified senior executive to head the Office of English Language Acquisition (OELA).

The Task Force urges the Secretary to make the appointment of leadership for this office a higher priority. The Task Force is ready to assist in the selection of a strong Latino education advocate to lead this important work. This office can play a critical role for ELL student achievement as it has been responsible for all Title III formula and discretionary grant programs, foreign language formula and discretionary grant programs (Title V), discretionary grants funded under the former Title VII of ESEA and the National Clearinghouse for English Language Acquisition. Furthermore, it is not clear to the Task Force if, how and when Title III funds will be targeted to improve ELL student achievement.

### **The Changing Demographics in our Nation's Schools**

The Task Forces believes that U.S. education policies must demonstrate a meaningful understanding that the demographic profile of our nation and our schools continues to change dramatically. Whatever models worked 50 years ago with a predominantly non-minority population, now often work as barriers to student learning. Innovation initiatives must be targeted to developing new strategies, methods, and instructional approaches that better respond to the changing demands of our students and our communities.

According to the latest 2008 Census population projection estimates, the Latino population is expected to triple, from 46.7 million to 132.8 during the 2008 to 2050 projection period, thus doubling its share of the U.S. population from 15% to 30 %. One in three U.S. residents will be Latino!

More significantly, the nation's population of children will be 62% minority by 2050, up from 44% today. The percent of Latino students will increase from 22% of these children in 2008 to almost 40% by 2050, while non-Hispanic white children will decrease from 56% to only 38%. Similarly the working-age population is projected to be more than 50% minority in 2039, with Latino workers making up more than 30% of the American workforce in 2050 (up from 15% in 2008).

To ensure the educational success of all our nation's children, and particularly, those most in need, the Task Force believes the Department must demonstrate unprecedented leadership and vision to transform our current system of unequal educational opportunities into a world-class model of innovation, fairness, and equity.