June 8, 2012

Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
Washington, D.C. 20201

Re: Comments on Race to the Top-District draft executive summary

Dear Secretary Duncan:

We, a collection of innovative and entrepreneurial education organizations with an interest in personalized learning, enthusiastically offer our support for the latest Race to the Top-District competition. The following comments are offered in hopes of improving on this critical effort to foster approaches to personalize learning and tailor instruction to the academic needs, interests, and learning styles of students – particularly those from low-income communities – to prepare them for success in college and careers.

While we applaud the Department for urging school districts to foster personalized learning environments, we worry that the competition as currently conceived may not maximize return on our $400 million federal investment. Our collective concern is that the competition is designed to reward districts that draft comprehensive personalized learning *applications* that may prove extraordinarily difficult to *implement*. We therefore focus our comments on four main areas where we feel the competition can be made more flexible, precise and effective:

- Add an outcomes-based "toolbox" option to the competition that will allow educators to experiment and prototype personalized learning services and tools
- Ensure LEAs and consortiums of LEAs can partner with nonprofit organizations to provide critical capacity to implement and scale personalized learning solutions
- Place greater emphasis on applicants partnering with effective educator-training programs that can prepare school leaders and teachers to serve in personalized learning environments
- Clarify the eligibility requirements specific to public charter schools, charter management organizations, and recovery districts

We conclude with a series of additional suggestions and comments related to other aspects of the RTT-D competition.

Add a flexible, outcomes-based "toolbox" option to the competition that will allow educators in the classroom to experiment and prototype different personalized learning services and tools

We strongly support RTT-D's emphasis on providing LEAs and consortiums with great flexibility in designing personalized learning environments, whether across schools, grade levels, or subject areas. And yet, we believe that this flexibility should be taken even further to ensure the organic growth of digital technology services and tools that we believe hold unique promise for creating and fostering true personalized learning environments.

To that end, we urge a simplified yet rigorous competition designed to create personalized learning "toolboxes" that would be made available by districts (and consortiums) to educators via a common platform. Educators within such districts would then decide for themselves whether to personalize instruction in their school or classroom. Under this toolbox approach:

1. The LEA or consortium first selects a set of personalized learning products and negotiates provisional contracts with vendors on a sliding, "as used" basis. The vendors will receive only partial payment upfront; the bulk of the contract funding is released if, and only if, the tools selected (a) are widely adopted by educators, and (b) are shown to significantly improve student achievement.
2. The personalized learning toolbox is made available to school leaders and teachers through a central, interoperable data platform that will be managed by the district or consortium lead.
3. School leaders and educators may then voluntarily select tools from the toolbox and use according to their needs. Importantly, because of the "as used" performance-based contracts, personalized learning providers will have the incentive to improve their products to meet the actual preferences of the end user (i.e., teachers, students, and parents). The typical arms-length, single-point-of-sale contract is thus replaced with an ongoing, collaborative relationship between user and supplier that is the hallmark of true innovation.
4. At the end of the grant period, the consortium or LEA will release remaining funds to those providers who have gained real traction in adoption and improved student learning. The Department in turn can compare effectiveness across grant recipients and evaluate which tools and services, based on the data, are high-quality.

The advantages of this approach are significant:

- The Department would evaluate an applicant's plan for (a) creating a common and open platform; (b) selecting tools for the toolbox; and (c) designing promising performance-based contracts. On this latter point in particular, applicants could be judged based on their creativity creating challenges, prizes and milestone-based "pay for success" payment structures, aligning the competition with recent OMB guidance.[1]

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[1] See OMB Memo from May 2012, "Use of Evidence and Evaluation in the 2014 Budget" (available at http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-14.pdf) and OMB Memo from March 2010, "Guidance on the Use of Challenges and Prizes to Promote Open Government" (available at http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-11.pdf).

- Personalized learning strategies and tools will be implemented voluntarily and from the ground up, thus ensuring critical educator buy-in (and alleviating the need for institutional stakeholder support).
- This option would be uniquely favorable to rural districts that may not have the central office capacity to design comprehensive personalized learning plans, but could form a consortium to support a single personalized-learning provider platform.
- Personalized learning providers will have powerful incentive to ensure that actual needs of educators, as revealed through on-the-ground implementation, are consistently assessed and met – and, if those needs aren't being satisfied, to revise and improve their services and products.
- For consortiums, this flexible approach eliminates the need for massive, complex coordination among the central offices of multiple LEAs.
- Teachers will be empowered to make and revise choices about the use of personalized learning tools in the classroom, fostering a true culture of innovation within the public school system.

In our view, awarding (at a minimum) 20% of the RTT-D competition funds in this manner will yield truly transformative innovations and provide a powerful social return on investment.

Expand opportunity for LEAs and consortiums of LEAs to partner with nonprofit organizations to provide critical capacity to scale high-quality personalized learning solutions

We believe personalized learning is a particularly promising strategy for consortiums of school districts, especially those in rural areas. Among other things, consortiums can create of common data platforms, provide a single entry point for procurement, and promote collaboration across districts of varying size and student demographics. At the same time, the task of requiring districts both to develop a personalized learning plan while also crafting a new governance model is extremely daunting. To achieve the latter, we believe it is critical that LEAs and consortiums can partner with outside entities to provide the capacity needed to govern and implement personalized learning. We specifically urge that:

- LEAs and consortiums may partner with nonprofit organizations, including intermediary organizations, to assist in implementing an applicant's plan to create personalized learning environments.
- Partnership organizations may use grant funds for purposes of seeding new personalized learning solutions, scaling capacity of existing high-quality personalized learning solutions, and coordinating and developing a comprehensive personalized learning strategy across member districts.
- The competitive preference priority identifies "nonprofit intermediaries" in the list of organizations that applicants may partner with.

Barring adoption of these suggestions, we urge that nonprofits and intermediary organizations be explicitly made eligible to receive subgrants from winning RTT-D applicants.

Place greater emphasis on LEAs and consortium of LEAs partnering with performance-based educator-training programs to train teachers and school leaders on strategies, tools and supports to personalize learning

We believe the teacher and leader training component of the RTT-D competition is underdeveloped. Although the draft rules outline the type of training that educators should undergo to successfully transition to

personalized learning for students, there is no specific guidance or priority for preservice training or partnerships that school districts (and consortiums) might form with institutions of higher education or alternative-certification providers.

We therefore urge you to consider prioritizing RTT-D applicants who agree to partner with and support performance-based educator training programs, such as (for example) Relay Graduate School of Education, the Urban Teacher Center, and the teacher residency models typified by members of the Urban Teacher Residency United. By "performance based" we mean programs that explicitly condition graduation, certification or licensure upon a teacher or leader candidate successfully demonstrating the ability to improve student achievement. These types of programs are particularly well-suited to train educators for personalized learning environments because they are highly data driven, and frequently measure student progress toward meeting learning goals.

Clarify the eligibility requirements specific to public charter schools, charter management organizations (CMOs), and recovery districts

We are particularly enthusiastic that, for the first time, charter schools and CMOs will be eligible to directly apply for Race to the Top funds. We have four suggestions to help ensure the Department receives high-quality applications from the charter sector.

First, CMOs should be explicitly eligible to apply either as LEAs (in cases where there is one charter and multiple campuses) or as a consortium (in cases where a CMOs has contracts to manage multiple legally distinct charter schools). Consistent with our comment above, charter districts and CMOs should be eligible to partner with nonprofit third-party operators to provide additional capacity and manage governance issues.

Second, it is unclear as to what would constitute evidence of 70% teacher support for an application from an LEA with no collective bargaining agreement. We suggest making the evidentiary threshold lower and easy to satisfy (e.g., through use of a simple online survey administered by the LEA).

Third, to the extent high-performing CMOs and charter school consortia are eligible, we suggest an alternative to the requirement (and core educational assurance) regarding turnaround strategies, since by definition high-performing charter applicants should not be operating such schools. Instead, we suggest prioritizing charter and CMO applicants that can demonstrate growth in districts with large numbers of low-performing schools or those that agree to take over (restart) low-performing schools currently run by school districts or other charter operators.

Finally, and relatedly, state-run takeover districts (e.g., Louisiana's Recovery School District, Tennessee's Achievement School District, Connecticut's Commissioner's Network, and the Detroit Recovery District) should be explicitly included as eligible applicants.

Other Recommendations

- Given the challenges of developing robust data systems with teacher-student matches (to say nothing of connecting P-12 with higher education data systems), we encourage the Department to be flexible in interpreting this requirement and recognize creative solutions that address it.
- It would be helpful to clarify how the Department will calculate "participating students" from "participating schools," given that the competition allows districts and schools to choose to focus on specific grade spans or subject areas.
- In our view, defining "personalized learning plan" as a "formal document" that sets forth a comprehensive set of goals and sequences to achieve those goals runs the risk of creating another layer of bureaucracy for educators to navigate. A more fluid definition that allows for greater flexibility is more likely to foster innovation.
- For applicants that plan to use technology to support personalized learning, we urge the Department to prioritize schools that already have, or plan to install, the proper bandwidth and technology infrastructure. In our experience schools need 50-100Mbps of Internet capability to implement blended, personalized instruction models.
- We believe the competition should contain incentives to create personalized learning environments that make data open and available to parents and students in standardized, easy-to-understand formats, thereby enabling them to make informed decision about their personalized learning plans.
- The Department should prioritize applicants that have well-thought out plans for ensuring school facilities can accommodate personalized learning environments.

On behalf of the education innovation and entrepreneurial community, we thank you for your attention to these comments.

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