

BUSINESS COALITION  
FOR  
STUDENT ACHIEVEMENT

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September 19, 2011

The Honorable Arne Duncan  
Secretary  
United States Department of Education  
400 Maryland Avenue, S.W.  
Washington, DC 20202

Dear Secretary Duncan:

The economy of tomorrow depends on the quality of education students receive today. The Business Coalition for Student Achievement, a coalition of leading corporate CEOs, urges you to uphold strong accountability and meaningful reform as key tenets of education policy as the Department of Education issues waivers to states on key policies of the Elementary and Secondary Education Act (ESEA).

BCSA is deeply concerned about the state of student achievement and sees a more effective system of public education as vital to the nation's long-term economic growth. A bipartisan reauthorization of ESEA is critical to achieving this goal and is the most effective way of improving federal education policy. In the absence of a timely reauthorization, BCSA understands that the Department of Education will soon invite states to apply for waivers from provisions of the current version of ESEA in exchange for reform commitments from states to strengthen education policy.

It is critical that the waiver process uphold the nation's commitment to strong accountability for public education, including accountability for student subgroups and meaningful reform of low performing schools. As you consider the criteria for issuing waivers to states, attached are recommendations for using this opportunity to prepare the nation's students for the 21<sup>st</sup> century global economy.

Mr. Secretary, everyday in our daily business operations we see firsthand what economic research consistently confirms; namely that the long term economic health of the United States depends largely upon the quality of education provided to all our nation's students. Some have expressed concern that granting waivers could result in relaxed requirements that will fail to confront education's shortcomings. That is why we urge you to apply the attached principles to any proposals where you consider granting waivers from existing federal education law. We urge that any waiver issued recognizes the immutable economic reality that there is no waiving the ever growing demands for an internationally competitive workforce.

The nation's business leaders stand ready to assist in your efforts to ensure that the students of today are prepared for the workplace of tomorrow.

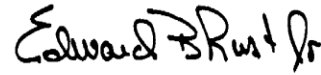
Sincerely,



**Craig Barrett**  
Former Chairman, Intel  
Co-Chair, BCSA



**William D. Green**  
Chairman, Accenture  
Co-Chair, BCSA



**Edward B. Rust Jr.**  
Chairman & CEO, State Farm  
Co-Chair, BCSA

C: The Honorable John Boehner  
The Honorable Harry Reid  
The Honorable Mitch McConnell  
The Honorable Nancy Pelosi  
The Honorable Eric Cantor  
The Honorable Steny Hoyer  
Members of the House Committee on Education and the Workforce  
Members of the Senate Committee on Health, Education, Labor, and Pensions

## **Business Coalition for Student Achievement Waiver Recommendations**

### **Transparent and Inclusive Waiver Process**

*The waiver process must be transparent and inclusive of all relevant stakeholders.*

In order to ensure that the waiver applications and plans are transparent to the public and include input from key stakeholders, we believe that the waiver process should include the following principles:

- The waiver process should be fully transparent at every stage. State applications should be made available as soon as they are submitted, as well as the peer review comments and the final approved plans.
- The waiver approval process should include a peer review process that includes key stakeholders that can help ensure quality and that the waiver plans lead to all students graduating college and career ready, including representatives of the business community.
- The waiver approval process should require that states include key stakeholders, including the business community, in the creation of their waiver plans and in the implementation of approved plans.

### **College and Career Ready Standards**

*To receive a waiver from any core ESEA policy, a state should be required to set internationally benchmarked standards and have plans to implement aligned assessments that reflect readiness for college, the workplace, and international competition.*

Among the class of 2011, only 25 percent of ACT-tested high school graduates met all four of ACT's college readiness benchmarks. With projections showing that two-thirds of jobs will require postsecondary education by 2018, the fact that so few high school graduates are ready for college level work is an indictment upon the current education system and a threat to the American economy.

Additionally, the fact that many students entering the workforce or postsecondary education require remedial education underscores the need for each state to have k-12 standards aligned to the needs of higher education and the workplace. Whether states adopt the Common Core State Standards Initiative or develop their own standards in accordance with postsecondary and workforce needs, there must be steady implementation of a college and career-ready education for every student.

### **Accountability**

*Waivers must not allow for a weakening of basic federal accountability that applies to the educational performance of all students.*

If states request a waiver from the requirement that all students perform at the proficient level in math and English Language Arts by the 2013–14 school year, such a waiver should only be

granted *in exchange for* establishing (1) a goal that all students will graduate from high school ready for college and a career, and (2) annual targets that reflect continuous and substantial improvement toward achieving this goal. States should be required to continue reporting data for all student subgroups. Additionally, states must have a system of accountability and improvement that differentiates rewards, assistance, and sanctions based on school performance at the whole school level and among student subgroups. Rigorous, data-driven improvement must be required of low performing schools.

#### **Required Action For All Low-Performing Schools**

*States receiving a waiver from core ESEA policies should have to demonstrate how they will enhance their focus on improving low performing schools, including an emphasis on high schools with a graduation rate of 60 percent or below.*

With approximately one-quarter of the nation's students failing to graduate on time, the federal and state focus on low-performing schools must increase. Concentrating on the lowest performing 5 percent of schools is important but insufficient to prepare the nation's students for the competitive marketplace. Were states to only focus on this small portion of schools, over 11,000 low performing elementary, middle, and high schools would fall outside the scope of concentrated reform efforts. A specific focus on high schools is necessary because high schools provide the last opportunity for the education system to prepare students for postsecondary education, and far too many high schools perform at an inadequate level.

#### **Teacher and School Leader Effectiveness**

*States receiving a waiver from core ESEA policies should be required to implement policies to strengthen teacher and school leader development in alignment with the increased expectations associated with college-and career-ready standards.*

The importance of quality instruction is well recognized as the single most important school-based factor in strengthening student achievement. Supporting the development of high quality educators requires a thorough and consistent effort in recruitment, preparation, induction, evaluation and professional development. States should also be required to implement comprehensive evaluation systems for teacher and school leaders that incorporate student achievement as a key performance measure. These evaluation systems will be used to assist teachers to improve performance, enhance professional development, and remove ineffective educators fairly and efficiently. Additionally, states should be required to continue efforts toward a more equitable distribution of effective educators among low performing schools.

#### **Data-Driven Decision Making**

*States receiving a waiver from core ESEA policies must demonstrate their commitment and ability to use longitudinal data to inform decision-making at all levels, including strengthening educator effectiveness and informing school improvement strategies.*

Effective use of data is essential to making critical decisions, whether improving individual student outcomes in the classroom or guiding billions of dollars of educational policies in the congressional committee room. With hard budget times affecting every level of education, the temptation to defer funding and implementing vitally needed data systems is great. No business makes even the most basic decision without consulting credible data; surely our students deserve the same attention.