



To: Obama Education Transition Team
From: Campaign for High School Equity
Re: High School Education and Civil Rights Priorities for Communities of Color
Date: December 3, 2008

Thank you for the opportunity to share our recommendations for the Obama Administration's education transition. The Campaign for High School Equity (CHSE) is a coalition of leading civil rights organizations representing communities of color that is focused on improving graduation rates, addressing the dropout crisis, and improving the nation's high schools. CHSE members are united in the conviction that all students deserve a quality high school education that will expand opportunities for success in life and allow them to become productive and prosperous adults.

CHSE is very concerned that seven thousand American kids drop out every school day, which adds up to 1.2 million dropouts every year. African-American, Hispanic, American Indian, and Alaska Native high school students have at best a six in 10 chance of graduating from high school on time with a regular diploma. About 2,000 high schools (14 percent of America's high schools) produce more than half of all high school dropouts. Not surprisingly, these dropout factories serve mostly students of color.

More detailed information about CHSE's agenda is in *A Plan for Success: Communities of Color Define Policy Priorities for High School Reform* (attached), which makes the case for the need to invest in high schools and provides specific policy solutions. Following are CHSE's recommendations for the education transition:

CHSE recommends that the Obama Administration address the following priorities for the U.S. Department of Education. The U.S. Department of Education should:

- Create a vision and policy agenda that makes accountability for improved student achievement and graduation rates for all students a core element and that current accountability provisions are strengthened, not weakened
- Recognize that high school reform is a core solution in ensuring our long-term economic prosperity
- Ensure that there is a policy focus and significant investment in improving graduation rates, addressing the dropout crisis, and closing the achievement gaps so that all students graduate high school prepared for college and work
- Ensure that the White House and the Department of Education leaders have the appropriate knowledge regarding the needs of minority and low-income youth and how to solve the educational challenges they face, particularly in offices that impact policy and budget



- Ensure that diversity is reflected in leadership and staff throughout the Department of Education, not just in the Office of Civil Rights (OCR), the Office of English Language Acquisition (OELA), or the Office of Indian Education (OIE)
- Ensure that effective and transparent communication –whether about new policies, implementation of laws, or enforcement of laws—is an integral part of the Department’s work, and that such communications efforts are widely disbursed throughout the country, through multiple mediums and in multiple languages, so that every school and every community can benefit, learn, and work together to improve education under the Obama Administration’s leadership

Policy Priority and Focus

CHSE recommends that the Obama Administration advance a high school reform agenda in the context of maintaining and enforcing the civil rights provisions of the Elementary and Secondary Education Act (also known as No Child Left Behind), while strengthening and improving the law in key areas, including addressing the needs of high schools. In addition, CHSE recommends that the Obama Administration fully fund ESEA at its fully authorized levels, as well as programs that support college readiness such as TRIO and GEAR UP. Specifically, CHSE recommends that the Obama Administration:

Current Policy

- Maintain and Enforce Graduation Rate Regulations. Recent regulations to ensure uniform graduation rates should be maintained and enforced. These regulations are an important step forward in ensuring fair and accurate information on how well students, particularly students of color, are faring in the nation’s high schools. Implementation should include high standards for states in the plans including for 4 year graduation rates and goals and growth targets.

New Policy Agenda

- Make Accountability and High School Improvement a Top Education Reform Priority. Addressing the dropout crisis, improving accountability for student achievement and graduation rates, and turning around low-performing high schools for all students, particularly students of color, should not be an afterthought or a small schools experiment. It should be a core element of the Obama Administration’s policy agenda and actions, including through new policy, legislation, funding, regulation, guidance, or executive order.
- Ensure that All Students Graduate Prepared for College and Work Through Specific Policy Initiatives. CHSE’s *Plan for Success* (attached) details policy initiatives that as a whole would improve high schools and ensure that every student graduates prepared for college and work. Specifically, CHSE recommends:
 - *Make all students proficient and prepared for college and work:* Align high school standards, assessments, curriculum, and instruction with college- and work-readiness standards; require states to publicly report on access to college preparatory classes and course-taking patterns by



- income, race, ethnicity, both among and within schools; promote culturally relevant content knowledge and teaching that prepares students to be effective in a global economy; and ensure that all students, especially those in high-need schools, receive rigorous and engaging classes in core subjects
- *Hold high schools accountable for student success:* Ensure that states complete progress in implementing the current graduation rate regulations; build on the uniform graduation rates and use longitudinal data systems and individual student identifiers to follow every child's path to graduation; develop an NCLB accountability system that requires schools to increase their disaggregated graduation rates over time and to consider graduation rates on an equal footing with high-quality assessments aligned to college and work readiness in determining school quality; use high-quality valid and accurate assessments for all students; and disseminate high school data and other information through media and other information distribution vehicles specifically serving communities of color
 - *Redesign the American high school:* Implement a variety of quality high school models that support different learning styles and student situations; provide integrated student supports that utilize both in-school and community-based services; promote strategies and targeted interventions that improve student numeracy and literacy skills without sacrificing access to high-level academic subjects; promote instructional practices designed to meet the needs of diverse learners such as reflexive learning and culturally competent learning techniques; ensure that legally and educationally valid criteria are used to appropriately inform decisions regarding student eligibility for services in special education, services for English language learners, college preparatory curricula and gifted and talented programs; develop consistent standards and practices, such as improved identification and assessment systems to facilitate English language learners integration into the public education system; and provide access to computers and other learning technologies that can be used to complement in-class discussions.
- Ensure that the needs of Native American students are an integral part of policy development, implementation, guidance, and regulation. Specifically, the Department of Education should:
 - Ensure that states, tribal governments and communities, neighboring areas, and the federal government work together in developing and implementing high standards and related assessments, and take into account that Native students can and do attend a variety of schools over their student experience (Tribal, BIE, and public).
 - Reaffirm the Original Intent of the Title VII Program by recognizing the importance of and providing for meaningful tribal involvement in setting the educational priorities for Indian students and the inclusion of Native language and cultural instruction. In addition, expand and strengthen the program to ensure that No Child Left Behind also means No Culture Left Behind through the use of culturally based education to meet the unique educational needs of Native students.



Agency Effectiveness

CHSE recommends that the Obama Administration structure and staff the Department of Education in ways that support diversity, demand authentic coordination of offices, and ensure knowledge and focus on the real needs of poor and minority students in every office, at every level.

Leadership

- Ensure Sufficient Capacity in the White House and the Department of Education to Support and Address the Needs of Communities of Color. CHSE recommends that the Obama transition team appoint experts in policy that will ensure that all students graduate prepared for work and college and particularly experts in the needs of students of color.
- Ensure Diversity Throughout the Department of Education. Ensure that communities of color and those highly knowledgeable about the educational needs of communities of color are appointed throughout the Department, including those knowledgeable about Latino, African-American, Native American, and Southeast Asian students.
- Make Integrity in Research a Priority. The education field deserves and needs leadership in ensuring that education research is high-quality, honest, and recognizes the needs of all students, particularly students of color.

Structure

- Make High Schools an Integral Part of the Policy Agenda. CHSE recommends that the Obama Administration resist efforts to structure the Department of Education in such a way that houses high school reform policy and programs in the Office of Vocational and Adult Education or in the small schools program office. High schools have been left out of the federal K-12 policy agenda for too long. They must be fully integrated into the Office of Elementary and Secondary Education (OESE) policy agenda.
- Invigorate OCR. The Bush Administration largely ignored the core role of OCR in monitoring and enforcing civil rights in education. By doing so, too many of the needs and rights of communities of color have gone ignored. OCR should be fully engaged in monitoring and enforcing civil rights laws, and civil rights in general should be considered an integral part of the education agenda. OCR should also be funded at levels that allow it to fully engage in its mission.
- Restructure OELA. The current Administration stripped OELA of its monitoring and enforcement responsibilities. As a result, OELA has not been able to appropriately enforce Title III requirements and has not been able to provide the leadership and visibility needed to ensure that the needs of English language learners are an integral part of education reform efforts. Overall, the current structure of OELA sends the signal that the concerns of English language learners are not a priority. To address these problems, CHSE recommends that the Obama Administration restore Title III monitoring and



enforcement responsibilities to OELA; elevate the Assistant Deputy Secretary of OELA to an Assistant Secretary position; and mandate policy, budget, and enforcement collaboration among OELA, OESE, and the OCR.

- Elevate the position for the Director of Indian Education. Currently, the Director of OIE is a GS position, while in previous years the position was a SES position housed under the Office of the Secretary. Because the responsibilities for Indian Education cross multiple federal programs at the Department of Education as well as across federal agencies, the Director of the OIE should occupy a position that empowers the director to look across programs and have input into all programs that impact the educational well-being of Native students.