

To strengthen
and promote
cities as centers
of opportunity,
leadership, and
governance.



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of Cities**

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August 27, 2009

The Honorable Arne Duncan
Secretary of Education
United States Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary Duncan:

The National League of Cities' Institute for Youth, Education, and Families greatly appreciates the opportunity to comment on the proposed guidelines for Race to the Top. We applaud the goals, and we notice the confluence between concerns of municipal leaders and those expressed by the Administration in this notice.

The National League of Cities (NLC) is the nation's oldest and largest organization devoted to strengthening and promoting cities as centers of opportunity, leadership and governance. NLC is a resource and advocate for 19,000 cities, towns and villages, representing more than 218 million Americans.

The Institute for Youth, Education, and Families (YEF Institute), a special entity within the National League of Cities (NLC), helps municipal leaders take action on behalf of the children, youth, and families in their communities. NLC launched the YEF Institute in January 2000 in recognition of the unique and influential roles that mayors, city councilmembers, and other local leaders can play in strengthening families and improving outcomes for children and youth.

Over the past decade, NLC – through its YEF Institute – has been working closely with cities and their locally elected officials to improve the quality of elementary and secondary education. We recognize that local elected officials in both large and small cities across the nation are partnering with school districts and other community members to improve local public schools and student academic achievement. High-quality education helps create quality cities by developing a skilled workforce, improving economic vitality, attracting and retaining families and residents, and encouraging a strong and engaged citizenry.

With or without authority over local school districts, mayors and city councilmembers can play key roles to support school improvement initiatives. Strong partnerships between the city, school district, local businesses, civic organizations, parents, and other key community leaders can lead to positive outcomes for children and youth. Municipal leaders can:

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- **Convene disparate groups** to discuss key priorities and mobilize the community to take action;
- **Focus public attention** on student achievement, teaching, and supports for learning;
- **Obtain data** to tell stories the public can understand to build consensus and support;
- **Promote adequate school funding** to invest in high-quality teachers, instructional resources, and facilities;
- **Share information and resources** between the city and local school districts;
- **Remove obstacles** to achievement by broadening access for all children; and
- **Support learning outside of schools** by creating a citywide afterschool system that ensures stability and long-term growth.

The National League of Cities (NLC), through its Institute for Youth, Education, and Families (YEF Institute), has established the **Mayors' Education Policy Advisors Network (EPAN)**. This national network facilitates communication among senior officials who are working with mayors on key issues related to education reform and school improvement. During the most recent semi-annual meeting of Mayor's Education Policy Advisors Network (EPAN) held in San Francisco, California, from June 1-3, Assistant Deputy Secretary James Shelton participated in a session entitled, "An Education Stimulus for the Nation's Cities." In addition to more than 30 members of EPAN, we were joined by representatives of the Alternative High School Initiative (AHSI) and the Early College High School Initiative (ECHSI).

As the lead organization for policy work in AHSI, the YEF Institute has been working intensely in three cities to help address their dropout rates and increase their graduation rates through management of a portfolio of alternatives. Our work in the three cities is based on AHSI's Seven Policy Conditions for Large-Scale Success. We are pleased to note the general complementarities between the school-level autonomies encouraged by the Department and AHSI's policy conditions, which are:

1. Increased College Access
2. Need-Based, Adequacy Approach to Funding
3. Rigorous, Reasonable Academic Standards and Assessments
4. Strong Accountability
5. Expanded Options for Parents and Students
6. Open Sector, Readiness to Open Alternative High Schools
7. Coordination with City and Other Public Agencies and Community Organizations

General Recommendations for the Role of Municipal Leaders in the Race to the Top Funds Cities, and mayors in particular, are exerting leadership in education in a variety of ways. Secretary Duncan's call earlier this year for more mayoral takeovers of urban school districts is just one of many routes municipal leaders across the country are taking to become highly engaged in education reform in their cities. Other noteworthy mayor-led initiatives include: monthly meetings between the mayor and the superintendent(s) in a community; close partnerships between cities and LEAs and/or charter schools; chartering schools directly; and providing wraparound services for students of all ages. As such, **EPAN strongly recommends that municipalities, in addition to LEAs, be eligible for Race to the Top state subgrants.** Other options for involving cities in the critical work of education reform include encouraging LEAs to partner with their cities by giving priority to city-school partnerships, requiring states to include letters of support from municipal leaders in their applications, or expanding the definition of LEAs to include municipalities, particularly those with significant ties to their school districts.

In regards to specific portions of the Department's proposed guidelines for the Race to the Top Funds, EPAN offers the following comments:

Proposed Priority 1: *Comprehensive Approach to the Four Education Reform Areas*

EPAN agrees generally with the comprehensive approach the Administration is taking toward education reform. We believe it is critical to encourage states to focus less on structural/process issues of education and more on the welfare and outcomes for students. To that end, we also agree with the Administration's four education reform areas. Some of our comments fall under the second reform area: Improving teacher effectiveness and achieving equity in teacher distribution. Moreover, due to the understandable focus of municipal leaders on redressing the dropout crisis, most comments from EPAN will focus on the fourth reform area: Supporting struggling schools.

➤ ***Reform Area 2: Improving Teacher Effectiveness and Achieving Equity in Teacher Distribution***

EPAN recommends that the Department reward states that apply based on new, evidence-based changes throughout larger education systems. ARRA provides opportunities to encourage a student-centered view of education and to seed new approaches to teacher training, which could contribute to systemic transformations. Specific recommendations for improving teacher effectiveness include:

- Allocate funds to change the focus of teacher training programs to support innovation;

- Improve the way teachers are taught in schools of education, ensure transparency and accountability, and guarantee student improvement; and
- Promote a pre-service year for teachers interested in teaching in alternative high schools and early college high schools.

Additionally, cities have a (perhaps unrecognized) role to play in teacher recruitment. For example, the cities of San Jose, California and St. Petersburg, Florida, provide mortgage loan subsidies to encourage teachers to work in their school districts. Additionally, the City of Louisville, Kentucky and others provide a STEM scholarship for a Master's teaching program specifically targeting teachers from alternative certification programs. The Department may want to add to the guidance an encouragement to involve cities in providing mortgage subsidies, scholarship programs, or other incentives for teachers moving into high-need communities.

➤ ***Reform Area 4: Supporting Struggling Schools***

The dropout crisis is a pressing issue in cities across the country. EPAN views stimulus funding as an opportunity to apply chartering authority in new ways, as a vehicle for high school reform, and as a way to provide multiple pathways to graduation for struggling students and dropouts in more cities. Specific options for supporting low-performing high schools include:

- Encourage/reward applications that propose holistic approaches to college and career readiness;
- Encourage the creation of system-wide chartering authorities, in addition to LEAs;
- Encourage experimentation with expanded chartering authority to increase high school options;
- Encourage states without charter schools to support LEAs that provide school choice, such as magnet programs and other innovative schools; and
- Encourage states to support LEAs – in conjunction with other partners (including municipal leaders, operators of proven school models, and postsecondary institutions) – to offer a broader portfolio of schools, particularly for struggling students and dropouts.

Proposed Priority 5: School-Level Conditions for Reform and Innovations

We recommend elevating Proposed Priority 5 from an Invitational Priority to a Competitive Preference Priority, on par with the emphasis on STEM. We believe this elevation in priority status has the potential to glean significant benefits to high-need students.

Furthermore, we would like to applaud the Department for including the following school-level condition for reform and innovation under Proposed Priority 5 - Invitational Priorities:

- (v) *Providing comprehensive services to high-need students (e.g., through local partnerships, internal staffing, and contracts with outside providers)*

States must consider allocating resources for flexibilities and autonomies conducive to reform and innovation to local partnerships by creating a safety net of wraparound services designed to increase student success. To that end, we also recommend inserting ***“including with municipal government leaders and agencies”*** as a requirement of local partnerships.

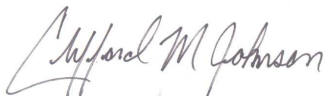
EPAN believes that the focus on school districts on listed flexibilities and autonomies is necessary for reform and innovation, but not sufficient. This focus also must include community- and district-level conditions (see AHSI Policy Conditions above) to ensure that individual schools have the best chance to survive and thrive.

➤ **Definition**

- **“Student”** is currently undefined. Usage of the term as it appears in the draft regulations could lead LEAs/states to focus mainly or only on young people who are currently enrolled in school. Given that 30-50% of once and former “students” in many cities are no longer enrolled/attending school, dropout recovery needs to be added as an emphasis area and an expansive definition of “student” needs to be used.

In addition to our comments above, please note that NLC’s YEF Institute heartily endorses the comments on Race to the Top submitted by the Alternative High School Initiative, Coalition for Community Schools, *New Day for Learning* Advisory Board, Afterschool Alliance, National Center for Summer Learning, and the George Lucas Educational Foundation. These organizations represent thousands of individuals and agencies across the country that are working to improve outcomes for young people. NLC shares the perspective of these organizations, and we hope you will take our endorsement of their comments under consideration.

Sincerely,



Clifford M. Johnson
Executive Director
Institute for Youth, Education, and Families
National League of Cities