



No Child Left Behind Waiver Applications

Are They Ambitious and Achievable?

Jeremy Ayers December 2011

Center for American Progress



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Contents

- 1 Introduction and summary**
- 4 The what and why of waivers**
- 6 A new approach to waivers: Flexibility *and* reform**
- 8 State applications: What do they propose?**
- 14 State applications: Is anything missing?**
- 18 Are state proposals ambitious and achievable?**
- 25 Findings**
- 27 Recommendations**
- 29 Conclusion**
- 30 Appendix A**
- 31 Appendix B**
- 32 About the author, acknowledgements, and disclosure**
- 33 Endnotes**

Introduction and summary

The Obama administration has offered states the chance to waive some requirements of the No Child Left Behind Act. States are required, however, to make specific reforms in exchange for increased flexibility. The administration has been clear it wants states to engage in “ambitious but achievable” reforms rather than merely asking for a pass from the law.

We reviewed applications submitted for the first round of waivers by 11 states to get a feel for how ambitious and achievable they are. The Department of Education is examining each application in detail, which is beyond the scope of this paper. But in taking a qualitative snapshot of the applications, a few findings emerged:

- **Clarity of goals.** Some states proposed clear, quantifiable goals for school progress. Others proposed goals that were difficult to understand and may complicate how well schools and the public understand them or use them to improve.
- **Clarity of school ratings.** Some states proposed clear and rigorous systems for holding schools accountable. Others proposed complex schemes that rely on too many factors and diffuse attention from key achievement measures.
- **Inclusion of subgroups.** Some states maintained goals and accountability for student subgroups that face challenges. Others proposed accountability systems that may deflect attention from each group of challenged students.
- **Readiness to evaluate educators.** Some states have the data and policy infrastructure they need to implement new evaluation systems right away. Others are starting from scratch and need to clarify how they will create and execute brand new systems.
- **Reduction of burden.** Few states shared specific plans for reducing administrative burdens placed on districts and schools.

We then took a look at two aspects of state applications: their evaluation and accountability systems. From that review two states—Tennessee and Massachusetts—“stand out” for articulating clear and challenging goals, proposing focused school-rating systems, and having data infrastructure that will help them implement evaluation systems. Their applications certainly can improve, but they possess notable strengths. Georgia, Kentucky, New Jersey, and Oklahoma could strengthen their application by providing “more detail” about their plans, and we pose observations and questions for each. Lastly, the remaining five states fall in between, in the “middle of the pack.” We identify some pros and cons of their plans at the end of this document.

 <p>Stand out</p> <p>While we did not rank or grade the states, the applications from these two states stood out from the rest for their clear goals and ready-to-implement evaluation systems.</p> <p>Massachusetts, Tennessee</p>	 <p>Middle of the pack</p> <p>Although we didn't use a strict rubric to evaluate the states on a point-by-point basis, we found these applications had some positives and some negatives.</p> <p>Colorado, Florida, Indiana, Minnesota, New Mexico</p>	 <p>Needs more detail</p> <p>After reading the applications we still had a lot of questions about how these applications would work. These states should provide more detail before they're approved.</p> <p>Georgia, Kentucky, New Jersey, Oklahoma</p>
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In the pages that follow, this report outlines what states must submit in their applications and summarizes some key elements of what states proposed or did not propose. We scanned each application to see how ambitious and achievable their accountability and evaluation proposals were, identifying some strengths, weaknesses, or questions left unanswered. The report concludes with findings that span the applications and recommendations for the Department of Education (summarized below).

1. **Do not rush to approve every application.** States are clamoring for relief from federal requirements, but the department should keep the bar high so that states indeed make ambitious reforms.
2. **Ask for more information.** Some states should clarify how they will treat student subgroups in accountability systems, how prepared they are to implement evaluation reforms, and how they plan to reduce administrative burden on districts and schools. No state described specific plans for reducing burden.

3. **Proceed with caution.** States have proposed new ways to treat student subgroups and to rate schools in accountability systems. This could provide better focus for school improvement efforts or divert crucial attention from historically disadvantaged students or key achievement measures. The secretary should carefully distinguish those plans that enhance subgroup and school accountability from those that backtrack.

The what and why of waivers

The No Child Left Behind Act, or NCLB, like almost all federal laws, allows states to forego, or waive, certain requirements as long as they receive permission from the federal government—in this case the Department of Education. Some aspects of the law cannot be waived, such as civil rights protections, programs for parent involvement, and certain fiscal requirements around the allocation of funds. But the rest is fair game.

In the case of NCLB, Secretary of Education Arne Duncan has asked states to specify actions they will take to reform their education systems in exchange for receiving waivers from 10 parts of the law. Those reforms fall under four principles:

- Ensuring students are college and career ready
- Developing state-defined accountability systems
- Enhancing teacher and principal evaluation policies
- Reducing administrative burden on districts and schools

States will receive a waiver lasting two years, after which they may reapply for another two-year waiver.

Eleven states submitted applications in November for the first round of waivers. Independent peer reviewers are examining the applications, will engage in dialogue with states, can request additional information or improvements, and will provide nonbinding feedback to the department. Department officials may also request additional information and improvements. The final decision rests with the secretary who will announce his decisions, perhaps on a rolling basis, during the winter of 2012.

Waivers are needed because NCLB is broken in some significant ways.¹ The law identifies schools as “in need of improvement” whether they missed achievement targets by a little or a lot. The law prescribes interventions for those schools, but the interventions are not working as well as they could. The law ensures teachers

have credentials to enter the profession but does not ensure they are effective with students in the classroom.

Congress must revise NCLB, originally called the Elementary and Secondary Education Act, to solve such problems permanently. But lawmakers have not been able to move a comprehensive bill to the Senate or House floor. Republicans have proposed highly partisan bills that would scale back the federal government's role in schools and even limit accountability for how states and districts use taxpayer funds.² The Senate Health, Education, Labor, and Pensions Committee passed a compromise bill in October that took some positive steps forward but also some significant steps backward.³ That bill has not seen further action.

With little prospect for bipartisan cooperation in sight, the Obama administration is wise to take action now to ensure states, districts, and schools move forward in education reform. The administration has offered states the chance to waive some requirements. States are required, however, to make specific reforms in exchange for increased flexibility, among them adopting new standards, accountability, and evaluation systems. The administration has been clear it wants states to engage in “ambitious but achievable” reforms rather than merely asking for a pass from the law.

A new approach to waivers: Flexibility *and* reform

The Department of Education offered states a waiver from 10 provisions in NCLB and one optional provision around increasing learning time for students.⁴ States were advised to seek flexibility for all provisions, not just some. The first round of applicants requested a waiver for all 10 areas and agreed to reform. All but three—Colorado, Georgia, and Minnesota—sought the optional waiver. Let’s look at the two aspects of waivers in turn.

Flexibility

States receive flexibility from current requirements such as setting annual targets for student achievement, how they identify and act in low-performing schools, and what actions they take to ensure teachers are qualified. Appendix A outlines the flexibility opportunities in detail.

Reform

States must agree to implement reforms according to four principles in order to receive greater flexibility.⁵ Under each principle the department asked states to describe specific steps they will take to address that principle. The principles include:

- Adopting college- and career-ready standards
- Creating state-defined accountability systems that reward success and promote improvement
- Strengthening teacher and principal practice through evaluation systems
- Reducing duplication and administration burden placed on districts and schools

Appendix B outlines the requirements in detail.

It should be noted that the reforms serve the purpose of, and in some cases enhance, the federal policy being waived. The federal government, for example, would waive a federally defined course of action in low-performing schools in exchange for states describing how *they* will identify, support, and spur action in low-performing schools.

Another example is the teacher quality waiver. Current law requires teachers to be highly qualified, or to have credentials, in order to ensure all students have good teachers. The waiver process would allow states to identify good teachers based on how well they do in the classroom, rather than acquiring paper credentials. States would then ensure poor and minority students have fair access to effective teachers. This is an enhancement of current law but is wholly consonant with the goals of equity and excellence in current law.

State applications: What do they propose?

The 11 state applications vary in their scope and contents, though all follow the four required principles. Chart 1 below summarizes each state’s plan for key requirements, and this report elaborates on each below.

Chart 1: Summary of state waiver proposals

	College and Career Ready Standards	College and Career Ready Assessments	Subjects in New Accountability System	New Annual Goals for Schools	Teacher and Principal Evaluations	Reducing duplication and burden on districts and schools	Requesting optional waiver?
Colorado	Adopting Common Core Standards	Participating in PARCC, SMARTER Balanced Assessment Consortium	Reading, Math, Writing, Science, English language proficiency, and Science	Schools must achieve and grow at specified levels, compared to their peers and compared to a standard	Adopted all guidelines	No explanation	No
Florida	Adopting Common Core Standards	Participating in PARCC	Reading, Math, Writing, and Science	Reduce by half the percentage of students in two lowest achievement levels by 2016-17. Increase by half the percentage of students in the two highest levels.	Adopted all guidelines	No explanation	Yes
Georgia	Adopting Common Core Standards	Participating in PARCC	Reading, Math, Science, Social Studies, and high school end-of-course exams	Cut in half the percentage of students below proficiency	Adopted some guidelines	No explanation	No
Indiana	Adopting Common Core Standards	Participating in PARCC but using ACT/SAT tests to measure college readiness in the interim	Reading and Math	All schools and subgroups within the school must receive an 'A' or improve by two letter grades by 2020.	Adopted all guidelines	No explanation	Yes
Kentucky	Adopting Common Core Standards	State assessments based on Common Core for grades 3-8. The ACT will be the capstone high school assessment.	Reading, Math, Science, Social Studies, Writing, high school end-of-course exams	Schools below proficient must improve a full standard deviation in a 5-year period. Schools at proficient must improve half a standard deviation in a 5-year period.	Adopted no guidelines	No explanation	Yes
Massachusetts	Adopting Common Core Standards	Participating in PARCC	Reading, Math, and Science	Reduce the proficiency gap by half by 2017	Adopted all guidelines	State-defined school plans will replace those mandated by NCLB.	Yes

	College and Career Ready Standards	College and Career Ready Assessments	Subjects in New Accountability System	New Annual Goals for Schools	Teacher and Principal Evaluations	Reducing duplication and burden on districts and schools	Requesting optional waiver?
Minnesota	State standards are aligned with Common Core and approved by state institutions of higher education.	State assessments based on Common Core for English/language arts; math assessments are approved by state institutions of higher education.	Reading and Math	Cut in half the percentage of students below proficiency	Adopted no guidelines	No explanation	No
New Jersey	Adopting Common Core Standards	Participating in PARCC	Reading and Math	Cut in half the percentage of students below proficiency	Adopted no guidelines	Charged task force to identify unnecessary regulations	Yes
New Mexico	Adopting Common Core Standards	Participating in PARCC	Reading and Math	All schools will improve so that their grade would reach the 90 th percentile score in the base year.	Adopted no guidelines	No explanation	Yes
Oklahoma	Adopting Common Core Standards	Participating in PARCC	Reading, Math, Science, Social Studies, and Writing	Schools meet goal if they score 300 or above on an achievement index. Or schools must improve 15% in math/reading, reach 95% for test participation, and graduate 82% of students (or make a 10% improvement).	Adopted some guidelines	No explanation	Yes
Tennessee	Adopting Common Core Standards	Participating in PARCC	Reading, Math, and Science	Cut in half the percentage of students below proficiency in 8 years. Cut in half the achievement gap between student groups in 8 years.	Adopted all guidelines	No explanation	Yes

New standards and assessments

The waiver process requires states to adopt college- and career-ready standards along with assessments that measure student growth based on those standards. Nine of the early states have adopted the Common Core standards and are participating in the Partnership for Assessment of Readiness for College and Careers, or PARCC, a federally funded consortium of 24 states developing common assessments in English and math.⁶ Colorado participates in PARCC and the other assessment consortium, the SMARTER Balanced Assessment Consortium.⁷

Two states diverge slightly from this path. Kentucky will use the Common Core standards for grades 3–8 but use the ACT assessment and planning tools for eighth grade and high schools. It will also devise its own state assessments, based on Common Core standards, for the lower grades. Minnesota will use the Common Core English/language arts standards but its own state standards and assessment for math. The state has worked closely with the American Diploma Project, a national-standards initiative sponsored by Achieve, to enhance its assessments.

New subjects tested for accountability purposes

Seven of the early states plan to administer additional tests besides reading and math in order to rate school performance. Most states will add science and/or writing assessments, while some would include social studies. Colorado would add English language proficiency to the mix, and Georgia and Kentucky plan to use standardized end-of-course exams in high school.

New ways to rate schools

States are not just planning to change their standards and tests. They would alter the way they use such information to rate schools. Each of the early states is unique in its proposed rating system, but a few common approaches emerge across states:

Growth measures

Every state would measure student-learning gains over time (student growth) in addition to single test scores obtained at the end of the school year (proficiency). Florida would split the difference 50-50 between proficiency and growth in grading schools. Minnesota would rate how well schools close gaps between student groups based on growth, not just proficiency.

Whole school measures

Several states would rate schools based on a variety of factors besides test scores. Kentucky would require all schools to undergo program reviews by the district and state that count for 20 percent of their rating, and it would eventually make results from new teacher and principal evaluations count for 10 percent. Oklahoma would make 33 percent of a school's rating based on factors like attendance, parent engagement, school culture, and other unspecified indicators. New Mexico would evaluate schools partly on an "opportunity to learn" survey but did not specify what that survey would entail.

College and career measures

Early states also proposed rating high schools based on indicators of college or career readiness. Indiana and Florida would use scores from Advanced Placement exams and industry certification. Kentucky already uses a suite of ACT assessments, a state occupational-skills test, and a military-aptitude test to track college and career readiness beginning in middle school.

New annual goals for school improvement

The waiver process would also allow states to significantly change their annual achievement goals. The department provided states three options for making the change:

- **Reduce by half** the percentage of students, including student subgroups, who are not proficient, the so-called gap-cutting option.
- **Ensure 100 percent** of students reach proficiency by 2020 (rather than 2014, as NCLB requires).
- **Use another sound method** to define ambitious but achievable goals for all districts, schools, and student subgroups.

No state chose the second option, but three states chose the gap-cutting option. Eight states chose the last or “other” option. Massachusetts essentially proposed the gap-cutting option but over five years instead of six. Tennessee promised to cut its gaps in half over *eight* years, pledging to improve proficiency by 3 percent to 5 percent each year and to close achievement gaps between student groups by approximately 6 percent annually—rates that would outpace the progress most states have made over the past few years under NCLB.⁸

Colorado and Oklahoma had complicated goals that were difficult to understand (see below). The increased complexity could mean that states are taking more sophisticated approaches to accountability, or they could be gaming the system with lots of indicators to reduce the impact of certain tests.

Chart 1 on page 8 summarizes each state’s new annual goals, but a few bear mentioning here:

- **The hybrid.** Florida proposed cutting in half the percentage of students not on grade level, and increasing by half the number of students above grade level.
- **The 100 percent twist.** Indiana proposed rating their schools on an A-to-F scale and then to ensure all schools become A schools, or improve two letter grades, by 2020. Depending on the rigor of the grading scale, of course, such a goal could be hefty or wimpy.⁹
- **It's all relative.** Kentucky would norm all schools. Low-performing schools must then improve by one-fifth of a standard deviation annually for five years in order to reach the 70th percentile. New Mexico would take six years to get every school up to the level of the top 10 percent of schools, as defined by a base-year norming of schools.
- **The growth model.** Colorado proposed setting annual goals for academic growth. To start the state would use data from the 2009-10 school year to determine the average rate of improvement, or growth, for each school. Then they would determine the state average. Schools would then meet their annual goal if they improve student learning at or above the state average (50th percentile) calculated in 2009-10.
- **The complex.** Oklahoma would create a student-achievement index for math, reading, test-participation rates, and graduation rates. Schools would meet their goal if they scored a certain number on those indexes or if they improved by 15 percent in math and reading, achieved 95 percent participation on state tests, and graduated 82 percent of students or made at least a 10 percent improvement.

Sound confusing? That's because some of the new goals and ratings systems are. The beauty of NCLB is that it standardized expectations across states, even while allowing them to create their own tests and to decide what counts for passing those tests. The increased complexity of goals and school ratings means some educators, parents, and advocates will have difficulty understanding why their school performs the way it does or how to improve it.¹⁰

Adding factors to school ratings will also water down the traditional impact of reading and math tests and perhaps divert attention to a diffuse number of test and indicators. Lastly, using growth measures always carries the danger of giving schools credit for making a little improvement but never really reaching the ultimate proficiency standard that students should.

Yet the education field has come to agree that schools should get credit for how students improve over the course of a year, not just how they perform at one point in time. And learning surely involves more than two subjects. The waiver process heralds state experimentation, which will create new opportunities as well as challenges for holding schools accountable. And it will certainly increase the demands placed on the Department of Education to monitor state efforts.

State applications: Is anything missing?

Early applications are missing some things one would expect to find or information that would be helpful in determining how ambitious and achievable the state waiver plans are. A few examples stand out, and they are discussed below.

Traditional accountability for student subgroups

The waiver process requires states to monitor, report, and hold schools accountable for the academic progress of student subgroups named by NCLB.¹¹ All the early states would collect and report subgroup data as they have in the past, but a number of states would take a new approach to subgroup accountability.¹²

Florida, Indiana, New Mexico, and Oklahoma would combine subgroups by focusing on the bottom 25 percent of students in each school, whether or not they belong to a subgroup. Massachusetts would create a “high-needs” subgroup that combines special education, low-income, and English-learner students. Kentucky would create a “student-gap group” that combines other smaller subgroups. Minnesota would give greater weight to larger subgroups.

Such proposals seem reasonable enough, but the question is how states will hold schools accountable for subgroup progress. Tennessee would focus on closing gaps rather than specifying goals for each individual subgroup, assuming gap closing will ensure the rising tide lifts all boats. Oklahoma would use subgroup performance to determine if a school’s letter grade (its rating) receives a plus or minus. Georgia would attach colored flags to school ratings to indicate how subgroups perform, and the flags would trigger action accordingly.

States claim that combining groups will capture more schools and students in the accountability system. Currently, small or rural schools may have too few students in a subgroup to include in the accountability system without violating student privacy. Every school, however, has a “bottom 25 percent” that could cover more students and students who belong to multiple subgroups.

Yet schools would not necessarily set goals or face consequences for the progress of *each individual* group. This could inadvertently leave some students out. Or schools could receive credit for improving the performance of their “super group” yet not make progress for individual subgroups. This is a technical issue which states could address by running a preliminary data analysis to ensure their systems do not neglect the achievement of traditionally underperforming groups. States should also make this data public so that independent observers can verify the claims. Until then it is difficult to assess this new approach.

Capacity to implement teacher and principal evaluation systems

States must engage in hard work to get their new systems in place quickly, especially as they transition to new standards and assessments that will be used to evaluate educators. Thus, states should make a clear case they are poised to do this work, especially those states that may be starting from, or close to, scratch. Few states, however, outlined their capacity for engaging in evaluation reform in detail, and some seem to be missing key information.

Kentucky plans to evaluate educators in four domains but has not decided what will be used to measure success in those domains or how those measures will be weighted. Indiana and Minnesota also did not specify how educators will be rated.¹³ Three states cannot link student-learning data to more than one teacher, and two states do not train educators to use data to improve instruction. Georgia lacks full ability to connect student data to teachers, is still developing some of its evaluation guidelines, and will require legislative action to enact reforms.

To help clarify state capacity we gathered a few data points to shed light on states’ preparedness (See Chart 2 on page 16). We drew from the annual survey of the Data Quality Campaign to see which states can connect student-achievement data to teachers and which states train educators in using data to improve instruction. We also pulled information from *Education Week*, which asked states if they needed to pass legislation to carry out their waiver plans, including evaluations. Combined, these data points provide an imperfect but nevertheless helpful picture of state capacity to enhance teacher and principal evaluation systems. Given that numerous states face data and policy obstacles, the department would be wise to ask for detailed information on how states can achieve these reforms. Some states contend, however, that their data plans, produced to receive support from the State Fiscal Stabilization Fund, are a more appropriate description of their capacity in this regard.

Chart 2: State approaches to teacher and principal evaluation systems

	Has the state adopted evaluation guidelines? ¹	Factors used to rate teachers	Can the state connect students to teachers by course and/or subject or by subject tested? ²	Can the state connect more than 1 teacher to a student for a particular course? ³	Do teachers receive tailored reports using student data? ⁴	Are educators trained to use data to improve instruction and school policies? ⁵	State will pass legislation to implement evaluations? ⁶
Colorado	All guidelines	50% student growth, 50% professional practice	No ⁷	No	Yes	Yes	No
Florida	All guidelines	50% student growth, 50% professional practice	Yes	Yes	Yes	Yes	No
Georgia	Some guidelines ⁸	At least 50% based on student progress	Yes (but not in elementary courses or subjects)	No	Yes	Yes	Yes
Indiana	All guidelines	Not specified	Yes	Yes	No	Yes	No
Kentucky	No guidelines	Not specified	Yes for course/subject for all levels; No for statewide assessments for all levels	Yes	No	No	No
Massachusetts	All guidelines	Professional practice and impact on student learning	Yes	Yes	No	Yes	No
Minnesota	No guidelines	35% student growth; various options for the remainder	No (but yes for high school course/subject)	Yes	Yes	Yes	No
New Jersey	No guidelines	50% student achievement, 50% teacher practice	No ⁹	No	Yes	Yes	Yes (New Jersey indicates this was incorrectly reported by Education Week.)
New Mexico	No guidelines	For tested grades or subjects: 50% student growth, 25% observation, 25% local measures ¹⁰	Yes	Yes	No	Yes	Yes
Oklahoma	Some guidelines	50% qualitative assessment, 35% student growth, 15% other measures	Yes	Yes	No	No	No
Tennessee	All guidelines	50% observation, 35% student growth, 15% other measures	Yes	Yes	Yes	Yes	No

1 The waiver application asks states to indicate if they have adopted all, some, or none of the federally required guidelines for teacher and principal evaluation systems.

2 Data Quality Campaign, "2010 DQC State Analysis: Element 5" (2010). 2010 is the most recent survey that includes this information.

3 Ibid.

4 Data Quality Campaign, "DQC State Analysis Responses by State" (2011).

5 Data Quality Campaign, "DQC State Analysis by Action" (2011).

6 Michele McNeil, "NCLB Waiver Plans Offer Hodgepodge of Grading Systems", Education Week, December 2, 2011, available at http://www.edweek.org/ew/articles/2011/12/02/13waivers_ep.h31.html?r=1740683738.

7 Further, Colorado is one of only six states that does not have a statewide teacher identifier with a teacher-student match. See Data Quality Campaign, "2011 DQC State Analysis: Element 5" (2011).

8 Georgia has been developing its Teacher Keys Evaluation System over the last twelve months with support from the Race to the Top. The evaluation system will be piloted from January through May of 2012. By school year 2014-2015, all Georgia districts will have implemented the new system.

9 Further, New Jersey is one of only six states that does not have a statewide teacher identifier with a teacher-student match. See Data Quality Campaign, "2011 DQC State Analysis: Element 5" (2011). However New Jersey indicates that it does have this capability and that its data system is poised to support its evaluation reforms.

10 For teachers in untested grades and subjects, the components of their evaluation will include 25% based on a school's A-F school grade, 25% based on observations, and 50% based on locally adopted multiple measures.

New school-improvement models

States and districts have loudly complained that federal models for improving low-performing schools are impractical and constraining. States, however, did not propose wildly different approaches to school turnaround in their applications. To be fair, the department required states to follow certain guidelines, but few states went beyond those guidelines. Minnesota would require new upfront “diagnostic assessments” to determine a course of action. New Jersey would similarly ask all priority schools to undergo a quality school review conducted by seven regional turnaround centers. Tennessee and Minnesota have interesting plans to connect high-performing schools with low-performing schools to share best practices. And almost all states outlined how they would provide schools with greater autonomy over budget and staffing.

Few states devoted significant attention to accountability, however. A report from the Center for American Progress this year found that states and districts must clearly and continually communicate their expectations and goals to schools, monitor progress, adapt goals in response to data, and articulate rewards and consequences early in the process.¹⁴ Many states explained their monitoring process, but few articulated goals, rewards, and consequences. Tennessee is an exception. The state set clearly defined goals, outlined a plan for tracking progress, and specified a range of supports and actions that occur if low-performing schools do not meet their targets.

Reducing duplication and administrative burden

Reducing burden is the fourth principle of reform in the waiver package, but few states discussed this principle at length. Massachusetts said it would substitute state-required school plans and report cards for those required by Title I of NCLB. Florida law requires the state education agency and school districts to annually review and reduce reporting burdens. New Jersey charged a task force with identifying unnecessary regulations, and the state will act on its recommendations in 2012. Lightening the load for districts and schools is a worthy goal that deserves more attention and detail before state plans are approved. The department sent states a mock application that did not request specific information on duplication, which probably explains the lack of detail in the proposals. More guidance on the topic could stimulate more information from states.

Are state proposals ambitious and achievable?

The Department of Education wants states to engage in “ambitious but achievable” reform. Yet the secretary will face serious pressure to approve as many applications as possible in order to provide relief from NCLB. We caution the department to resist this pressure because it could easily lead to lowering standards. The department and peer reviewers are wise to engage in substantive dialogue with states to improve their applications over time.

It is beyond the scope of this report to conduct a comprehensive scoring of all applications. The department is taking months to do so with the help of 21 external peer reviewers and dozens of internal staff. This snapshot, instead, makes brief qualitative observations concerning two aspects of state plans: accountability goals and ratings, and evaluation systems. We examined state applications with a few questions in mind:

- **How clear and challenging were states’ annual achievement goals?** Clarity helps secure buy-in from districts and schools and enables action more easily than confusing or complicated goals. Goals should also be rigorous but attainable, so that schools stretch to grow but don’t give up, thinking state expectations are unrealistic.
- **How many factors are included in school-rating systems?** Too many factors can lead to confusion and could divert attention from key priorities by which to judge and act in schools. Too few goals can lead to overly simple judgments.
- **How rigorous are teacher and principal evaluations?** Student-learning gains must be a significant factor, but each state sets its own percentage (See Chart 2 on page 16). We looked to see how much weight states gave to various factors and made a call about whether states ensured student outcomes drive the process or if they used other factors to mute their effect.

- **How prepared are states to implement evaluations?** We used independent information on state data systems to get a sense of how much capacity they have to implement their evaluation plans. And we assumed states requiring legislation to enact reform will have greater difficulty compared to those that can move ahead without legislative action.

Two states stand out—Tennessee and Massachusetts—for articulating clear and challenging goals, proposing focused school-rating systems, and having data infrastructure that will help them implement evaluation systems. Four other states—Georgia, Kentucky, New Jersey, and Oklahoma—have proposals that lack clarity or require more detail that would strengthen their plans. The remaining five states have pros and cons in their proposal that are worth mentioning.

The comments below represent a qualitative, journalistic review. They are by no means exhaustive, empirical, or final. No comment should be taken as an endorsement or a recommendation for rejection. But the observations do merit consideration during deliberations by the department.

Stand out

While we did not rank or grade the states, the applications from these two states stood out from the rest for their challenging goals and ready-to-implement evaluation systems.

Massachusetts

Massachusetts proposed a clear accountability goal of cutting the proficiency gap in half by 2017. The state claims many of its schools have achieved this, making the goal achievable in addition to ambitious. It proposed clear and straightforward factors in school ratings including test participation, achievement, growth, and graduation rates; and it will continue to use its five-level rating system to categorize schools based on those factors. The state's combining of subgroups, however, deserves careful scrutiny to ensure schools are held accountable for the progress of all student groups.

Massachusetts has adopted all required evaluation guidelines, having recently approved new state regulations in this area, and it has a fairly robust data system

that can support them. Massachusetts identified the factors that contribute to educator ratings, but it has yet to define their percentages or weight. The state should clarify this before approval.

Tennessee

Tennessee proposed raising achievement in schools by 3 to 5 percentage points a year and closing gaps between student groups by 6 percent a year. The Education Trust has analyzed average growth rates across states and it appears to us that Tennessee falls in that range.¹⁶ The state deserves credit for articulating clear and rigorous goals. Tennessee has a well-developed longitudinal data system that will support evaluation reforms and the state has developed all guidelines set forth in the waiver application.

Tennessee has experienced some hiccups in implementing its evaluation system funded by Race to the Top, though, and student learning counts for only 35 percent of ratings. But the state seems to be making course corrections. And there certainly is no science in deciding what weight to give student growth, though we wonder if teachers in tested subjects and grades might have greater weight placed on student learning.

Middle of the pack

Although we didn't use a strict rubric to evaluate the states on a point-by-point basis, we found these applications had some positives and some negatives.

Colorado

Colorado is a pioneer in using student growth data. It will rate schools based on college readiness, achievement, and student growth—how students perform compared to their peers across the state and compared to a state-defined standard. It is difficult to discern how objective the state-defined standard is, making it confusing to identify quantifiable annual school goals. Colorado has adopted all evaluation guidelines, has a statewide definition of teacher and principal effectiveness, and clearly articulated factors for rating educators—student growth and professional practice. The state data system, however, cannot link student data to individual or multiple teachers.

Florida

Florida would award school grades based on achievement and growth, but would also include the performance of a “bottom 25 percent” of students. This has pros and cons as discussed above, and the state would give schools credit for making as little as 5 percent gains with this group. It is also unclear whether Florida would simply report this data or use it to hold schools accountable for subgroup progress.¹⁷ Florida will base educator ratings half on student growth and half on professional practice. The state has already developed evaluation guidelines required by the waiver application, and its longitudinal data system and state policies support their evaluation reforms. Plus, Florida participates in the Teacher-Student Data Link Project that works to accurately attribute student learning to the appropriate teachers.¹⁸

Indiana

Indiana set a clear goal of getting all schools to become A-schools or to improve two letter grades. The state quantified what that improvement will require each year and will set interim goals for each school. Indiana would hold each school accountable for the bottom 25 percent of its students, potentially masking the progress of individual subgroups. But the state claims, using current data, that such an approach will cover more low-performing students than current subgroup policy does. The state should make its data publicly available to verify its claim. Indiana has adopted all required evaluation guidelines and does not require legislation to carry out its plans. In addition, its longitudinal data system appears robust. That said, the state did not specify what factors will be considered in evaluating educators, which should be clarified before final approval.

Minnesota

Minnesota identified four equally weighted factors for school ratings. One factor measures how well schools improve the rate of growth between student subgroups, and subgroups factor into proficiency ratings according to their size. This approach appears unique among states and seems to treat subgroups in a fairly traditional way. But the application was comparatively short in detail and did not make a data-based case that its accountability approach is ambitious. Minnesota benefits from having a relatively robust data system to support its evaluation

reforms. But the state has not finished adopting all required guidelines, has not specified what factors contribute to teacher and principal ratings, and has some limitations in its ability to link student and teacher data.

New Mexico

New Mexico identified a few key factors for school ratings and how much weight each factor carries. Five percent would come from an undefined “opportunity to learn” survey that could provide impetus for improving equity or be nebulous. Schools would receive separate grades for achievement and growth in order to distinguish between those on track and those off track but improving. Accountability would focus on a bottom 25 percent category, which entails the pros and cons discussed above. New Mexico has adopted all required evaluation guidelines and requires student achievement to be a significant factor in teacher ratings. The state’s data infrastructure appears to be strong, but it must pass legislation to enact its reforms.

Needs more detail

After reading the applications from the following states we still had a lot of questions about how these applications would work. These states should provide more detail before they’re approved.

Georgia

Georgia set a clear goal of cutting both its proficiency and achievement gaps in half. The state will rate schools on a variety of factors including achievement, growth, gap closing, school climate, participation, and financial efficiency. The inclusion of efficiency is interesting given the growing recognition of how important educational productivity is.¹⁹

But it is unclear how these factors will be weighted, and the state does not yet have an operational statewide growth model. Georgia would hold schools accountable for the bottom 25 percent of performers, potentially masking the progress of each subgroup. The state will label schools with performance flags that identify achievement gaps and trigger action. This proposal is intriguing because it could potentially heighten attention to subgroups, but it lacks sufficient detail or supporting data to verify its claims.

Georgia has an ambitious plan to make student growth at least 50 percent of a teacher’s evaluation and it has almost finalized its policy for accurately attributing student learning to the appropriate teachers. But the state lacks full ability to connect student data to teachers, is still developing some of its evaluation guidelines, and will require legislative action to enact their reforms.

Kentucky

Kentucky is clear about how it will rate schools and will grant partial credit to schools depending on their performance. The state will eventually make teacher and principal ratings count for 10 percent of school accountability. This could direct schools to focus more on educator quality. But the state has set confusing goals, asking struggling schools to improve by one-fifth of a standard deviation each year. The state should quantify the goals so that schools and the public can understand them.

The state has proposed a combined “super group” of historically disadvantaged students, but it did not make a data-rich case that such a move will hold schools accountable for the growth of every subgroup. Also the state has proposed several measurements that could count for the student-learning factor in school ratings, but it did not specify their weight. That should be clarified to ensure the bar remains high for evaluating schools.

Kentucky is just beginning to change its educator-evaluation system and must do significant amounts of work including specifying what factors will be used to rate teachers and principals and how those factors will be weighted. The state has rightly pledged not to publicly publish individual teacher ratings,²⁰ but it did not mention how it will use that data to ensure poor and minority students have fair access to effective teachers.

New Jersey

New Jersey chose the straightforward gap-cutting approach to yearly goals and would retain accountability for subgroups reaching those goals. The state proposed a new report card that would rate schools in four categories—achievement, college and career readiness, graduation and postsecondary success rates, and closing achievement gaps.²¹ New Jersey would maintain traditional subgroup accountability for the achievement measure, and it would evaluate how well schools close achieve-

ment gaps between the bottom 25 percent of students and the top 75 percent for the gap-closing measure.

Yet the state has proposed a new school grading system that will not be finalized until the spring of 2012, meaning how the state grades schools and holds them accountable could change in the coming months. New Jersey should clarify how final the new grading proposal is and how likely the new measures are to pass. In the meantime, the Department of Education should consider delaying approval until the issue is clarified.

In terms of evaluations, the state has not developed the evaluation guidelines required by the waiver application, and it will finalize linking student performance and class rosters for all schools by September 2012. One union affiliate has recently expressed strong opposition to evaluation changes, forcing the Newark superintendent to scale back her plans. But the state has moved ahead in 10 other school districts.²²

Oklahoma

Oklahoma plans to grade schools on an A to F scale, and schools will get their grade based on four factors. One factor is a “whole school improvement” category made up of several subcategories. Then, schools receive a “+” or “-” next to their grade based on whether or not they meet additional annual goals. This seems potentially confusing to stakeholders and a bit complex to translate into action at the school or district level. Yet Oklahoma’s system could be a sophisticated look at the many factors that make schools successful. The state should clarify how it will maintain focus and how it will work with districts and states to clearly understand and improve school ratings.

Oklahoma lacks some data capacity to implement its teacher-evaluation plans, which are yet to be finalized. Oklahoma has only adopted some of the required guidelines for educator evaluations while others are still in development. Fifteen percent of teacher ratings, for example, would derive from “other measures” teachers choose with their administrator. The other measures could, but not necessarily, include state assessments, school assessments, “off the shelf” assessments, ACT and AP scores, or graduation rates. Some of these measures would be rigorous and consistent across schools in a district. Others like school assessments are nebulous and could be potentially inconsistent. We think the state should clarify how the “other” category would work in practice and whether or not it would diffuse the impact of student growth.

Findings

States vary in their approach to accountability and evaluation systems in their applications. A few observations stand out and merit consideration:

Clarity of goals

Some states proposed clear, quantifiable goals for school progress. Others proposed goals that were difficult to understand and may complicate how well schools and the public understand them or use them to improve. Clarity is key to securing buy-in from schools and, more importantly, to ensuring that goals can be used to support and spur improvement.

Clarity of school ratings

Some states proposed clear and rigorous systems for holding schools accountable. Others proposed complex schemes that rely on too many factors and diffuse attention from key achievement measures. The field does not agree on any one approach, but there is surely a happy medium between current law and a confusing constellation of factors.

Inclusion of subgroups

Some states maintained goals and accountability for student subgroups that face challenges. Others proposed accountability systems that may deflect attention from each group of challenged students. Several states proposed combining subgroups into “super groups” in order to include more students and schools in the accountability system. States could bolster their plans by making a data-driven case that they are correct and by making such data public for independent observers to verify.

Readiness to evaluate educators

Some states appear to have the data and policy infrastructure needed to implement new evaluation systems right away. Others are just beginning and need to clarify how they will create and execute brand new systems. Some states have clearly defined factors they will use to rate educators, while some have not. This is a wide variance that deserves careful scrutiny. States should not be penalized for starting from scratch, but they should enhance their plans with an analysis of capacity.

Reduction of burden

Few states shared specific plans for reducing administrative burdens placed on districts and schools, though the department gave minimal direction for doing so. States should clarify their thinking on this topic and the department could help by providing guidance or at least asking for more information.

Recommendations

The Department of Education has stated it will work with states and peer reviewers to enhance state plans. That is a wise move given the variance among applications. States are proposing new or experimental policies, so there is plenty of room for improvement. As the department enters new territory in monitoring and overseeing state reforms, it should keep the following recommendations in mind:

Do not rush to approve every application

States are clamoring for relief from federal requirements, but not every plan is as solid as it could be. The department should keep the bar high so that states indeed make ambitious reforms. The stakes are lower in the first round because states have time before the end of the school year to make adjustments. But the department will need to remain firm as the spring approaches and the pressure mounts to offer relief.

Ask for more information

Some states should clarify how they will treat student subgroups in accountability systems, how prepared they are to implement evaluation reforms, and how they plan to reduce administrative burden on districts and schools. Few states described specific plans for reducing burden. And there is wide variance in how states treat subgroups. Equity is a key principle of federal education law, so the department has a critical role to play in ensuring states meet the needs of all students.

Proceed with caution

States have proposed new ways to treat student subgroups in accountability systems. This could provide better focus for school improvement efforts or divert crucial attention from historically disadvantaged students. States have

also proposed increasing the factors used to rate school progress. Such changes can improve the sophistication of evaluating schools or distract from a few key measures. The secretary should carefully distinguish those plans that enhance subgroup and school accountability from those that backtrack.

Conclusion

Some states have submitted thoughtful waiver applications that deserve serious consideration, while some have submitted applications that deserve serious conversation about how to improve. Our analysis is a modest and brief snapshot of the first 11 proposals, which raises questions more than providing definitive answers about the merits of each application. We commend these early states for re-envisioning their education systems in a transparent way and for engaging in a dialogue with the Department of Education to enhance their plans. Much work lies ahead, however, in refining, evaluating, and ultimately implementing these applications.

We know from past experience that the inertia of the status quo can hinder even the best-laid plans. So we urge the department to set the bar high in the approval process, even as it works with states to enhance their plans. Given the lack of immediate congressional action to reauthorize No Child Left Behind, these plans form the blueprint for the next few years of education reform. The pressure is on, rightfully, to ensure such reforms are indeed ambitious and achievable.

Appendix A

Flexibility from No Child Left Behind requirements²³

1. **Flexibility regarding the 2013–14 timeline for determining adequate yearly progress.** Current law requires states to ensure 100 percent of students are reading and doing math at grade level by 2013–14. Each year states set achievement targets that lead to that goal. A waiver would allow states to push the deadline back and to set new yearly goals that are more practical.

2. **Flexibility in school improvement requirements.** Current law requires schools that repeatedly miss their yearly targets to take federally defined actions to improve, with actions becoming increasingly severe each year schools miss their targets. Such actions have not proven effective on a large scale. A waiver would allow states to develop their own schedule and actions.

3. **Flexibility in district-improvement requirements.** Current law requires school districts, like schools, to take federally specified actions when they miss their yearly targets. A waiver would allow states to create their own improvement system for districts.

4. **Flexibility for rural districts.** Current law allows rural districts some leeway in the use of federal funds. A waiver would increase that leeway.

5. **Flexibility for schoolwide programs.** Current law allows districts with enrollments of at least 40 percent low-income students to use federal funds for whole school programs. A waiver would allow districts to expand that option to any school that is a priority or focus school (see Appendix B for a definition).

6. **Flexibility to support school improvement.** Current law sets aside funds targeted to low-performing schools but restricts their use to Title I schools. A waiver would allow districts to more broadly use those funds but within low-performing schools.

7. **Flexibility for rewarding schools.** Current law outlines how states and districts can reward schools making progress. A waiver would increase their ability to do so.

8. **Flexibility regarding highly qualified teachers.** Current law requires that teachers in core subjects have certain credentials to be deemed highly qualified. Districts that cannot or do not meet the requirement must set aside a percent of federal funds in order to improve teacher qualifications. A waiver would allow states and districts to forego these requirements and instead focus on improving how effective teachers are with students in the classroom. A state would not be exempt, however, from ensuring poor and minority children are not taught at higher rates by inexperienced, unqualified, or out-of-field teachers, a key civil rights protection for disadvantaged students.

9. **Flexibility to transfer funds.** Current law allows states and districts to transfer funds between various federal programs. A waiver would increase their ability to do so.

10. **Flexibility to use School Improvement Grant funds.** Current law sets aside funds for improving chronically low-performing schools but only schools eligible for Title I funds. A waiver would allow states more leeway to use that money in priority schools (see page 5 for a definition).

Optional flexibility

11. **Flexibility for increasing learning time.** Current law provides approximately \$1 billion for improving learning outside of the regular school day, such as afterschool and summer school programs, through the 21st Century Community Learning Centers program. Research and good practice have shown that expanding the school day or year to increase learning time can improve student outcomes. A waiver would allow states to use federal money for increasing learning time in addition to programming outside the regular school day and year.

Appendix B

Reforms required to receive flexibility²⁴

College- and career-ready expectations for all students

The Department of Education requires states to:

- Adopt college- and career-ready standards in at least reading and math
- Implement the new standards by the 2013–14 school year
- Adopt and administer assessments that measure student growth in grades 3–8 and once in high school
- Adopt English language proficiency standards
- Annually report the college-going and college credit-accumulation rates for all students and subgroups of students

State-developed accountability systems that recognize success and support schools that struggle

The Department of Education requires states to:

- Develop new accountability systems based on reading and math, graduation rates, and student growth over time
 - Option A:** Include only reading and math scores.
 - Option B:** Include subjects other than reading and math.
- Set ambitious but achievable annual goals in at least reading and math
 - Option A:** Reduce by half the percentage of students who are not at grade level (i.e., proficient) within six years.
 - Option B:** Ensure 100 percent of students are on grade level by 2020.
 - Option C:** Use another sound method that results in ambitious but achievable goals for all students.
- Recognizing “reward schools” that make progress on those goals
- Identify the bottom 5 percent of low-performing schools as “priority schools” and effect systemic change by following federal turnaround parameters
- Identify an extra 10 percent of schools that have the greatest achievement gaps between student groups as “focus schools” and work to close the gaps
- Provide incentives and supports to ensure improvement in all schools not making their yearly goals
- Build state, district, and school capacity to improve student learning

Supporting effective instruction and leadership

The Department of Education requires teacher and principal evaluation systems that:

- Are used for improving instruction and meaningfully differentiating educator performance
- Use multiple factors to rate educators with student growth being a significant factor
- Regularly evaluate educators and provide usefully, timely feedback
- Use evaluation ratings to inform professional development and personnel decisions

Reducing duplication and unnecessary burden

The Department of Education requires states to assure that they will evaluate and revise administrative requirements to reduce duplication and unnecessary burden on districts and schools.

About the author

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Acknowledgements

Research assistance for this report was ably provided by Jennifer Steck and Stephanie Frenel. Conversations with Natasha Ushomirsky, Allison Horowitz, and Melissa Tooley at The Education Trust were also helpful. The author is solely responsible for the analysis and conclusions of this report.

Disclosure

Cynthia G. Brown, Vice President for Education Policy at the Center for American Progress, served as an alternate peer reviewer for the first round of NCLB waivers. She reviewed a draft of this brief. But she did not share information or engage in conversation about the waiver application she read with the author or staff at the Center for American Progress.

Endnotes

- 1 See Jeremy Ayers and Cynthia G. Brown, "A Way Forward" (Washington, DC: Center for American Progress, 2011).
- 2 Jeremy Ayers, "Republican Education Bills Appease the Right but Do Little to Help Struggling Students," *ThinkProgress Economy*, September 16, 2011, available at <http://thinkprogress.org/education/2011/09/16/321589/republican-education-bills-struggling/>.
- 3 Center for American Progress Action Fund, "Podesta and Brown on Senate HELP Committee's Bill to Revise No Child Left Behind," Press release, October 19, 2011, available at http://www.americanprogressaction.org/pressroom/2011/10/statement_esea.
- 4 Information for this section comes from U.S. Department of Education, "ESEA Flexibility" (2011). For more information on the optional waiver, see Isabel Owen, "Take Your Time: Why States Should Use Education Waivers to Increase Learning Time" (Washington, DC: Center for American Progress, 2011).
- 5 Information for this section comes from U.S. Department of Education, "ESEA Flexibility" and "ESEA Flexibility Request" (2011).
- 6 "Partnership for Assessment of Readiness for College and Careers," available at www.parcconline.org/ (last accessed December 6, 2011).
- 7 "SMARTER Balanced Assessment Consortium," available at <http://www.k12.wa.us/smarter/> (last accessed December 13, 2011).
- 8 See Naomi Chudowsky and Victor Chudowsky, "State Test Score Trends Through 2008-09, Part 1: Rising Scores on State Tests and NAEP" (Washington, DC: Center on Education Policy, 2010). The Education Trust used data from ten states to determine that reducing by half the percentage of students not at grade level (i.e., the gap-cutting goal in the waiver package) is an achievable goal because it is being met by a "substantial number of schools" in those states. See Natasha Ushomirsky, Daria Hall, and Katie Haycock, "Getting It Right: Crafting Federal Accountability for Higher Student Performance and a Stronger America," (Washington, DC: The Education Trust, 2011).
- 9 Indiana estimates in its application that improving two letter grades would require increasing proficiency rates by 20 percentage points by 2020.
- 10 Perhaps this is why a number of states have moved to giving schools letter grades.
- 11 NCLB requires states, districts, and schools to collect and report student achievement data for all students, as well as for low-income students, ethnic minority groups, students with disabilities, English language learners, and by gender.
- 12 See Michele McNeil, "NCLB Waiver Plans Offer Hodgepodge of Grading Systems," *Education Week*, December 2, 2011, available at http://www.edweek.org/ew/articles/2011/12/02/13waivers_ep.h31.html?r=1740683738.
- 13 Minnesota will base 35 percent of probationary and tenured teachers' evaluations on student growth. Remaining factors, with unspecified weight, can include observations, portfolios of work, and measures of student engagement.
- 14 Jeremy Ayers and Melissa Lazarin, "Incentivizing School Turnaround: A Proposal for Reauthorizing the Elementary and Secondary Education Act" (Washington, DC: Center for American Progress, 2011).
- 15 See Chuck Edwards, "The Fourth Certification," *Title I-derland*, September 30, 2011, available at <http://titleonderland.blogs.thompson.com/2011/09/30/the-fourth-certification/>.
- 16 Ushomirsky, Hall, and Haycock, "Getting It Right."
- 17 Florida would use this data to identify 15 percent of its schools as low-performing schools. But that would not necessarily hold the remaining 85 percent of schools accountable for subgroup progress.
- 18 See "Teacher Student Data Link Project: Participating States and Districts," available at <http://www.tsdl.org/ParticipatingStatesSchools.aspx> (last accessed December 14, 2011).
- 19 See Ulrich Boser, "Return on Educational Investment" (Washington, DC: Center for American Progress, 2011).
- 20 See Diana Epstein and Raegen Miller, "Subtraction by Distraction: Publishing Value-Added Estimates of Teachers by Name Hinders Education Reform" (Washington, DC: Center for American Progress, 2011).
- 21 If approved, New Jersey's new report card would rate schools based on achievement, graduation and postsecondary success rates, closing achievement gaps, and college and career readiness. It would also track student-level progress including early warning indicators, college and career readiness, and how successfully high school graduates fare in college.
- 22 John Mooney, "Pilot Teacher Evaluation System Slow to Gain Traction in Newark," *NJ Spotlight*, December 8, 2011, available at <http://www.njspotlight.com/stories/11/1208/0032/>.
- 23 Information for this section comes from U.S. Department of Education, "ESEA Flexibility" (2011).
- 24 Information for this section comes from U.S. Department of Education, "ESEA Flexibility" and "ESEA Flexibility Request" (2011).

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