



NAACP



The Education Trust

NCLR
NATIONAL COUNCIL OF LA RAZA



**National
Urban League**



LEAGUE of UNITED LATIN
AMERICAN CITIZENS



**National Center for
Learning Disabilities**



**The Leadership
Conference**



NATIONAL
INDIAN
EDUCATION
ASSOCIATION
Advancing Excellence for Our Native Students



MALDEF
The Latino Legal Voice for Civil Rights in America.

DEMOCRATS
for **EDUCATION REFORM**



**ALLIANCE FOR
EXCELLENT EDUCATION**

COPAA



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

Dear Secretary Duncan:

We write to express our utmost concern that under the current Elementary and Secondary Education Act (ESEA) waivers, state accountability systems are masking the academic performance of individual student groups, including students of color, low-income students, English-Language learners, and students with disabilities. We strongly urge the U.S. Department of Education (ED) to correct course and ensure that in the next round of waiver renewals, states must make the achievement and attainment of each group of students count in ratings for all schools. Moreover, underperformance for any groups of students must trigger meaningful supports and interventions.ⁱ

A recent analysis of data from new state systems shows that school rating systems do not account for the achievement and growth of individual groups of students in a meaningful way. A school with an “A” rating may *only* be academically preparing its white or affluent students, while African-American, Latino or low-income students are not seeing the same academic progress or achievement. Moreover, 16 states and territories have received waivers but do not require interventions when individual student groups miss their graduation rate targets.

Our organizations, which advocate for groups of students that have historically been underserved by our nation’s education system, will stand up to ensure that these students matter. We have, unfortunately, returned to a time when schools are being sent the message that it is not important for all their students to reach their academic potential. It is critical for ED’s waiver renewal guidance to include strong policy regarding student subgroups, as this policy could be in place for up to four years and will set a precedent for the eventual reauthorization of ESEA. We are ready and prepared to work with you to make sure that school accountability systems account for and respond to the achievement and graduation of *all* student groups.

Sincerely,

Alliance for Excellent Education
The Education Trust
Council of Parent Attorneys and Advocates
Democrats for Education Reform
Leadership Conference on Civil and Human Rights
League of United Latin American Citizens
NAACP
National Center for Learning Disabilities
National Council of La Raza
National Indian Education Association
National Urban League
Mexican American Legal Defense and Educational Fund
Southeast Asia Resource Action Center

ⁱ ED’s 2013 initial waiver renewal guidance issued on August 29, 2013 (paragraph 10), as well as guidance issued on March 5, 2013 (question C-48b), specifically required states to ensure that interventions are provided in Title I schools when one or more subgroups miss AMOs or graduation rate targets. Waiver renewal guidance must align with these policies asserted by ED.