



September 14, 2007

The Honorable George Miller
Chairman
Education and Labor Committee
Washington, DC 20515

The Honorable Dale Kildee
Chairman, Subcommittee on Early
Childhood, Elementary and Secondary Education
Washington, DC 20515

The Honorable Howard McKeon
Ranking Member
Education and Labor Committee
Washington, DC 20515

The Honorable Michael Castle
Ranking Member, Subcommittee on Early
Childhood, Elementary and Secondary Education
Washington, DC 20515

Re: Comments on NCLB Title II, Part F Discussion Draft

Dear Chairman Miller, Rep. McKeon, Chairman Kildee, and Rep. Castle:

On behalf of the Consortium for School Networking (CoSN), the International Society for Technology in Education (ISTE), the Software & Information Industry Association (SIIA), and the State Educational Technology Directors Association (SETDA), we write to comment on Title II, Part F of the No Child Left Behind (NCLB) reauthorization Discussion Draft. We are extremely supportive of your inclusion of the Achievement through Technology and Innovation (ATTAIN) Act as Title F, and provide below several comments aimed at its further improvement.

Our organizations represent tens of thousands of K-12 educators who use or oversee technology as well as businesses that partner with educators to provide needed teaching and learning technologies. We view technology as critical for our schools to both meet the goals of the No Child Left Behind Act to raise student achievement and ensure high quality teaching, and to ensure that our nation's students are prepared to compete in the 21st Century. Yet, many schools lack the capacity and training necessary for the 21st century classroom and for meeting the needs and expectations of today's digital native students.

We are especially gratified that the key elements of the ATTAIN Act are included in this draft, including: 1) the targeting of funds to professional development and systemic school reform centered on the use of technology; 2) the targeting of competitive grant funding for districts with schools that are not making adequate yearly progress; and 3) the renewed commitment to the goal of all students being technology literate by the end of eighth grade.

However, we want to draw your attention to a few provisions in the draft Title II, Part F that differ from provisions in the ATTAIN Act (HR2449) as introduced with bi-partisan support by Representatives Roybal-Allard, Hinojosa, Biggert, and Kind. Specifically, we urge the Committee to consider the following concerns and recommendations aimed at further improving this legislation:

- Minimum Formula Allocation.
 - Recommendation: Insert a \$3,000 minimum LEA allocation for the formula portion of Title II, Part F such that all qualified LEAs will receive at least \$3,000 in a given fiscal year.
 - Justification: HR2449 established a minimum, annual formula grant allotment for LEAs of \$3,000, providing that all qualified districts would receive at least this minimum amount. This provision was inserted into HR2449 in recognition of the fact that numerous districts receive

formula grants under the existing Enhancing Education Through Technology (EETT) program that are inadequate to operate meaningful and effective programs. Indeed, over one-half of districts receiving EETT formula funds received under \$5,000, with nearly 20% (mostly small and rural LEAs) receiving less than \$1,000. Based on our estimates, larger districts currently receiving allocations above this minimum would be held harmless under current appropriations levels. The reallocation of funds would be small, totaling less than \$12 million annually, while the Title F draft increase in formula funds from 50% to 60% would more than offset this shift.

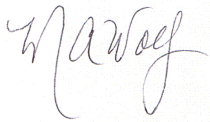
- State Administration and Research.
 - Recommendation: Include HR2449's provisions which allow for states to use up to 5% of funds for state activities and technical assistance, and an additional 2.5% for research and evaluation. At a minimum, insert HR 2449's provision establishing a \$100,000 minimum for state activities and evaluation.
 - Justification: HR2449, especially its competitive grants, is focused on the evaluation and implementation of *research-based and innovative systemic school reform* that centers on the use of technology. State leadership is critical to support districts in determining and replicating effective and research-based practices. The Title II-F draft provides states with 3.33% of all funding received for state activities and an additional 1.67% to conduct evaluations. In contrast, HR 2449 provides the greater of \$100,000 or 5% for state activities and the greater of \$50,000 or 2.5% for evaluations. Further, current law allows states 5% for state activities but neither requires nor provides funding for evaluations. We are very concerned that reducing state activities funding from 5% to 3.33% and omitting HR 2449's \$100,000 minimum will provide inadequate funds for states, especially small states, to coordinate education technology programs and provide technical assistance. We also believe that the draft's slashing of funds for evaluations nearly in half will not allow states to conduct and support the quantity or quality of research on education technology envisioned elsewhere in Title F and throughout the NCLB reauthorization draft.
- Student Technology Literacy.
 - Recommendation: Insert HR 2449's provisions on student technology literacy assessments. At a minimum, provide encouragement to and support for states to identify challenging academic content and achievement standards and to measure student progress towards technology literacy. Lastly, to ensure that the public is informed of progress towards student technology literacy, add a requirement for annual local, state and federal collection and reporting of student technology literacy data.
 - Justification: The current Title II-F draft maintains the goal of achieving student technology literacy by the eighth grade, but eliminates HR 2449's requirement that states assess student technology literacy at least once by the end of eighth grade. Instead, the draft requires only that states "carry-out activities to assess the state's progress towards ensuring that its students are technologically literate by the eighth grade." Our organizations submit that the only way to determine whether the technology literacy goal is being met is to implement some measures of student progress. Also, we believe it important that states identify the challenging academic content and achievement standards that states will use to ensure that students will be technology literate. Finally, we agree wholeheartedly that technology literacy measurements should not count towards school adequate yearly progress, need not be separate exams, and could be incorporated into existing assessments – all of which are spelled out in HR 2449.
- Professional Development.
 - Recommendation: Increase the professional development set-aside for formula grants to 40% and retain the current law's exception permitting states to waive the professional development set aside upon an LEA's demonstration that they have otherwise met these professional development needs.
 - Justification: The current Title II-F draft requires that states spend 30% of their formula and competitive grants on professional development and related tools. While the research

demonstrates the continuing critical importance of professional development in the effective use of technology, Title II-F represents but a slight improvement over the status quo of current law, which calls for a 25% set aside for professional development but does NOT include related tools as a use of funds. In contrast, HR 2449 provides a 40% reservation of funds for formula grants. While we appreciate the draft's commitment to making professional development a focus of Part F, we continue to believe that a further targeting of resources is needed to ensure the training of teachers to use technology effectively in the classroom. Continuation of the current Title II-D EETT waiver would provide both an enhanced focus on training, while providing LEAs with flexibility should they have met their professional development needs already.

- Authorization of Appropriations.
 - Recommendation: Insert a \$1 billion authorization level for Title II, Part F.
 - Justification: The current Title II draft contains no authorized funding level for Part F, whereas current law Title II-D and HR 2449 authorize \$1 billion. We believe that education technology remains and will continue to be integral to NCLB's success and believe that it merits an authorized funding level of \$1 billion in Part F of Title II. The current Title II-D was funded at about \$690 million in its first three years (FY 2002-04), and restoring funding to this or greater levels is needed to meet local needs for improving student achievement through the use of technology.

With these changes, Title II, Part F – the ATTAIN Act – has the potential to raise student achievement through using technology for systemic reform efforts and ensuring on-going and sustainable professional development. We believe that these changes are critical to meeting the core tenets of the ATTAIN Act and the No Child Left Behind Act. We thank you for the opportunity to provide these comments and we look forward to continuing to work closely with you and your staff on this important legislation.

Sincerely,



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Executive Director
SETDA



Keith Krueger
CEO
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Don Knezek
CEO
ISTE



Ken Wasch
Executive Director
SIIA

cc. Rep. Lucille Roybal-Allard
Rep. Ruben Hinojosa
Rep. Judy Biggert
Rep. Ron Kind