



No Child Left Behind Waiver Applications

Are They Ambitious and Achievable?

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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.

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