



July 30, 2021

Submitted via www.regulations.gov

Ms. Nkemjika Ofodile-Carruthers

United States Department of Education

400 Maryland Avenue SW, Room 4W308

Washington, DC 20202

Re: ED-2021-OPEPD-0054: Proposed Priorities and Definitions: Secretary's Supplemental Priorities and Definitions for Discretionary Grants Programs

Dear Ms. Ofodile-Carruthers,

The Aurora Institute respectfully submits the comments below in response to the United States Department of Education's (Department) request to receive feedback on the Secretary's six proposed priorities and related definitions to inform the Department's management of discretionary grant programs. We appreciate the opportunity to provide public comments and applaud the Department's commitment to seek public input to prioritize the needs of all learners, educators, and all other relevant actors intertwined in the K-12 learning ecosystem in discretionary grant programs moving forward.

Background on the Aurora Institute (formerly iNACOL)

The Aurora Institute is a non-profit organization that seeks to transform education systems and accelerate the advancement of breakthrough policies and practices to ensure high-quality learning for all K-12 learners. We envision a world where all students, especially those who have been historically underserved, attain the knowledge, skills, and dispositions necessary to achieve long-term success, contribute to their communities and advance society.

In response to the Office of Planning, Evaluation, and Policy Development's (OPEPD) public notice, the Aurora Institute has provided guidance on Proposed Priority 2, the definition of Competency-Based Education, and amending the definition of underserved students.

Proposed Priority 2(b)(10)--Promoting Equity in Student Access to Educational Resources, Opportunities, and Welcoming Environments

We applaud the Department for their commitment to ensuring that community voice is elevated and central to informing and making decisions that influence policy and practice at all levels. To foster strong relationships, leaders at the school, district, and state level need to have a sense of the culture and experiences that shape their students' lives. Valuing the insight and perspectives of local communities, especially disconnected students, is a priority to promote student agency, motivation, and sustainable



community change. Experts suggest that “sharing power”, or intentionally using resources to engage equitably with all members of the school community when making decisions, increases the quality of family engagement.¹ Research also suggests that all families from all socioeconomic, educational, and racial backgrounds, when given direction, can become more engaged and supportive of their child's schooling.²

Fundamentally, diverse authentic engagement empowers local communities and helps localities design a future student-centered education system with purpose. Education leaders must learn what is specifically preventing people’s full participation, systematically remove those barriers, and create meaningful opportunities for all community members to have an impact.³ Promoting equity is a community effort and the success of ensuring all students have the resources for a high-quality tailored educational experience, in part, depends upon the intentional support and engagement of the local community and family participation. We fully support the Department prioritizing community and family engagement while designing and administering discretionary grant programs.

PROPOSED DEFINITIONS

Proposed Definition of Competency-based education

The original working definition of competency-based education (CBE) was developed in 2011 at the National Summit for K-12 Competency-Based Education (Sturgis, Patrick, & Pittenger, 2011).⁴ The National Summit was co-hosted by the Aurora Institute and the Council of Chief State School Officers, with more than 100 national education practitioners and personalized learning experts. The 2011 working definition helped create common understandings of critical elements in competency-based education systems among stakeholders who were working separately and calling similar reforms by different names—competency-based, mastery-based, proficiency-based, and performance-based education.

Eight years after creating the original working definition, the Aurora Institute organized an additional summit and gathered feedback from over 100 educators, researchers, and education advocates to jointly construct an updated seven part definition of CBE that incorporated new evidence-based research and practice that better meet student pathway needs.

¹ Great Schools Partnership. (n.d.). *The case for community engagement*. Great Schools Partnership. <https://www.greatschoolspartnership.org/resources/equitable-community-engagement/the-case-for-community-engagement/>.

² Van Voorhis, F. L., Maier, M. F., Epstein, J. L., & Lloyd, C. M. (2013). (rep.). *The Impact of Family Involvement on the Education of Children Ages 3-8: A Focus on Literacy and Math Achievement Outcomes and Social-Emotional Skills*. MDRC. Retrieved from https://www.mdrc.org/sites/default/files/The_Impact_of_Family_Involvement_ES.pdf

³ Great Schools Partnership. (n.d.). *The case for community engagement*. Great Schools Partnership. <https://www.greatschoolspartnership.org/resources/equitable-community-engagement/the-case-for-community-engagement/>.

⁴ Sturgis, C., Patrick, S., & Pittenger, P. (2011). It’s not a matter of time: Highlights from the 2011 Competency-Based Learning Summit. Retrieved from http://www.aurora-institute.org/wp-content/uploads/iNACOL_Its_Not_A_Matter_of_Time_full_report.pdf



The updated 2019 definition of competency-based education⁵

1. Students are empowered daily to make important decisions about their learning experiences, how they will create and apply knowledge, and how they will demonstrate their learning.
2. Assessment is a meaningful, positive, and empowering learning experience for students that yields timely, relevant, and actionable evidence.
3. Students receive timely, differentiated support based on their individual learning needs.
4. Students progress based on evidence of mastery, not seat time.
5. Students learn actively using different pathways and varied pacing.
6. Strategies to ensure equity for all students are embedded in the culture, structure, and pedagogy of schools and education systems.
7. Rigorous, common expectations for learning (knowledge, skills, and dispositions) are explicit, transparent, measurable, and transferable.

Educators, researchers, advocates, and policymakers across the country interested in student-centered learning use and design systems of learning based on this gold standard definition that took hundreds of hours of deliberation and research with stakeholders within all levels of the learning ecosystem. We encourage the Department to expand the definition of CBE by incorporating all seven components listed above.

Unfortunately, the proposed CBE definition offered by the Department only incorporates one of the seven comprehensive field-tested elements shaping the competency-based education sector. The proposed definition does not acknowledge student agency, timeliness, personalized instruction, varied pacing, or equity in its proposed definition of CBE, which are all foundational elements to fully implement CBE. As the Department confirms the final discretionary grant programs definitions, we urge the agency to adopt all seven principles of CBE to accurately support and prioritize the most recent practice and innovations in CBE underway all across the country.

Proposed Definition of Underserved students

For learners to thrive in the 21st century education system, present-day and into the future, students need hardware and universal access to high-quality internet to receive digital instruction. Comprehensive broadband infrastructure provides access to the internet for both real-time classroom instruction and also anytime, anywhere learning. Unfortunately, the COVID-19 pandemic has illuminated the significant size of the digital divide and inequitable access to the internet across the United States.

Many students, especially those who have been historically underserved, did not have the adequate technological resources necessary to continue learning throughout the pandemic. Black, Latinx, rural, and low-income students, in particular, are significantly more likely to lack access to high-speed internet

⁵ Levine, E. & Patrick, S. (2019). What is competency-based education? An updated definition. Vienna, VA: Aurora Institute



and learning devices than wealthier white students in urban or metropolitan areas.⁶ Research has also shown that people of color, even when controlling for income, have fewer choices for broadband providers, are more likely to live in an unserved or monopoly area, and they are less likely to have access to the latest-generation broadband technologies.⁷

While significant federal and state efforts, such as the series of Covid-19 federal stimulus relief legislation, the federal infrastructure bill, and the Emergency Broadband Benefit program, have been made to eliminate the digital divide, a sizable portion of underserved students still do not have adequate access to a computer or the internet to receive digital instruction. These unconnected students can only receive instructions within the four walls of a classroom. They cannot access additional learning opportunities, tutoring, virtual only schools, or other digital options to access anytime, anywhere learning. Furthermore, these inequitable digital disparities disproportionately impact low-income and rural students contributing to the current opportunity gaps.

We encourage the Department to add “unconnected students,” which are students who do not have access to their own individual device or high-quality internet at home, to the definition of underserved students for the administration of discretionary grant programs.

Conclusion

Final grant priorities and definitions direct grantees to expand, innovate, and demonstrate creativity in advancing equity. We, overall, support the administration’s direction. The suggested changes, however, are intended to provide additional guidance to support student-centered learning systems and structures to address inequities in our current, outdated education system. If you have any questions about the content of these comments, do not hesitate to reach the Aurora Institute’s Policy Director, Fred Jones, at fjones@aurora-institute.org or 412-527-6638. We look forward to hearing back from you.

Sincerely,

A handwritten signature in cursive script that reads "Fred Jones".

Fred Jones
Policy Director
Aurora Institute

⁶ National Center for Education Statistics. (2019). *Figure 4. Percentage of children ages 3 to 18 with no internet access at home, by selected child and family characteristics: 2010 and 2017*. Retrieved from https://nces.ed.gov/programs/coe/indicator_cch.asp (accessed 01/20/21).

⁷ Turner, S. D. (2016, December). *Digital Denied: The Impact of Systemic Racial Discrimination on Home-Internet Adoption (Rep.)*. Retrieved https://www.freepress.net/sites/default/files/legacy-policy/digital_denied_free_press_report_december_2016.pdf