



**Department of Education**  
**America Forward Agency Transition Memo**

Education — from the earliest years through post-secondary degree attainment — is the key both to individual opportunity and to building a shared future for our nation. Closing achievement gaps requires reimagining the way that schools and systems work and measuring their success.

America Forward's Coalition of more than 70 entrepreneurial organizations across the country are leading the way in the use of cutting edge data and research to pursue bold, outcomes-driven solutions to some of the most difficult challenges associated with K-12 education, higher education, and workforce development. Our organizations are constantly learning about what works, developing new innovations, measuring outcomes, and achieving real results in their communities. Such innovations in human capital, data, and technology have the potential to reshape the way learning happens and harness the skills and talents of every student.

In the K-12 system, we know a lot about what it takes to educate students, particularly those from challenging backgrounds, whether they attend traditional public schools, public charter schools, or are educated in other settings. Students from under-resourced communities often face challenges outside of school that they carry with them into the classroom. Yet, too many of the schools that serve students from under-resourced communities are not adequately prepared to respond to their needs, and operate in systems that make it difficult, if not impossible, to assemble the kind of accomplished educators, comprehensive supports, and positive school culture that students need to learn and succeed. More money, greater choice, higher standards, early education, targeted supports — none of these strategies are sufficient on their own. Real reform efforts must do it all — from a place of political will that empowers, incentivizes, and invests in the kind of comprehensive, community-based systematic change that is needed.

In post-secondary education, under-resourced students continue to face significant challenges. Existing barriers to post-secondary education — including financial barriers, lack of comprehensive support and accommodations, and misaligned requirements — often represent insurmountable obstacles for students. To meaningfully address these challenges, Federal policy must create stronger linkages between K-12 and higher education; provide clear, actionable information to students and families; incentivize new approaches to higher education that recognize real world skills and competencies; ensure sufficient supports for students, from enrollment through graduation; and help students find employment and manage debt after they graduate. Such a multi-pronged approach is necessary if we are to reduce the number of students who are unable to complete their post-secondary program, who are buried under unsustainable debt, or who graduate, but are unprepared for the rigors of the global economy.

We challenge President-elect Trump to ensure that every American is placed on the ladder of success through a great education and to a great job, securing the future of the nation by helping states,



communities, schools, early learning programs, and their nonprofit partners accelerate improvements that can expand opportunity, achievement, and success for all.

## **Policy Proposals**

### **1. Emphasize Outcomes and Accountability through Data Collection and Information Sharing**

#### **a. Support Flexibility, While Ensuring Accountability**

Under the Every Student Succeeds Act (ESSA), states are granted important new flexibilities, while important guardrails remain in place to ensure all students have access to a high-quality education. One important element of this is the flexibility of states to include new measures of school quality or student success in their accountability systems. We urge the next Administration, when continuing to implement ESSA, to maintain states' flexibility to select indicators that reflect a "whole-child" definition of college- and career-readiness – and that may include factors that assess students' social-emotional development, in addition to purely academic information – and assign them substantial weight. This can be done while also reinforcing the clear mandate in the statute that the specific academic indicators be weighted more heavily in the aggregate, and of substantial weight individually, than potential additional factors.

In this new era of increased flexibility, it is also critical that our nation's schools are led by effective principals who can design and adopt school improvement strategies that will truly make a difference for students. The Department of Education should support states and districts in understanding the importance of strong school leadership in high-quality implementation of the ESSA. Such information, perhaps in the form of a Dear Colleague letter, could inform states on how to use funds in a cross-cutting manner to invest in leadership effectiveness, such as funds received under ESEA Title II, Part A for State-level activities described in subsection (c) of ESEA section 2101, including, as applicable, funds reserved under paragraph (3) of such subsection. The letter could also recognize the strategy of building effective school leadership as an evidence-driven strategy (as defined in ESEA section 8002 (21)) for improving student performance, particularly in schools identified for comprehensive support and improvement and targeted support and improvement. Finally, the Department of Education could provide additional implementation support to ensure new programs and requirements are implemented in a manner that maximizes the benefit of these new provisions for students, teachers, principals, and other school leaders.

In higher education, institutions should be empowered to improve outcomes for students by recognizing the realities facing today's students and considering the core competencies sought by employers in that context. As part of this effort, it is important that post-secondary providers and employers work together to create innovative credentialing and certification programs that reward the development of certain, in-demand skills that apply directly to areas of need in the economy. The next Administration can support these efforts by advancing policies that:

- i. Incentivize accrediting agencies to drive quality and outcomes and incentivize new accrediting agencies to foster disruptive innovation in the higher education sector by prioritizing student success outcomes in lieu of inputs

- ii. Unlock federal student aid for students seeking the education and training at newly-accredited outcomes-driven programs, including in proven certificate programs and other opportunities that lead directly to employment
- iii. Develop a protocol at the Office of Personnel Management for recognizing micro credentials (which recognize individual skills or practice) and credentials offered outside of traditional education institutions that takes into account their relevance, rigor and reliability
- iv. Create a system whereby micro credentials are accepted by the Department of Labor as evidence of learning through internships, service year programs, and other experiential learning
- v. Department of Labor should also be tasked with validating that such credentialed experiential learning programs constitute “vocational education” per the determination requirements of the Fair Labor Standards Act (FLSA) and, therefore, are deemed to be FLSA compliant
- vi. Create a Civilian Service Option for returning military members to provide returning veterans with much-needed transition time, pathways to education, training for jobs, and the dignity and pride of continuing their service here at home. This mission could be supported as an eligible benefit under the GI Bill, through the Department of Defense transition programs, or through Department of Labor veterans’ assistance programs.
- vii. Incentivize partnerships between postsecondary providers and school districts, as employers, that promote advanced credentialing and certification in the teaching profession, specifically for STEM teachers, special education teachers, and teachers of English Learners.

**b. Provide Students, Parents, and Key Stakeholders with Clear Data and Information**

Under ESSA, including data on post-secondary enrollment on state and local report cards will help students and their families better understand how well schools are preparing students to enter and succeed in post-secondary education. In addition, collecting, linking, and reporting this data will help teachers, principals, and other educators, as well as policymakers, better understand how to prepare students for post-secondary success and target limited resources to the schools that need the most support. We urge the Department of Education to maintain and strengthen these reporting requirements, as well as to promote and support state efforts to make data as transparent and accessible as possible to parents, educators, students, schools and community partners.

With regard to higher education, many under-resourced students and their families struggle to make informed decisions about where to attend college, often due to uncertainty over how to pay for college, how likely they will be to graduate and move into a successful career, or what specific accommodations may



be available to students. Today, information on costs, outcomes, supports and accommodations at different institutions is oftentimes either not reported, or presented in a disjointed manner that makes comparisons across institutions difficult and confusing. The next Administration should pursue policies that require institutions of higher education (IHEs) to publicly report information on costs, financial aid, student support services, and student outcomes in a format that is clear and accessible, including:

- i. Require information about college program costs and outcomes by individual institutions to be publicly posted, including data on persistence and graduation rates among students, including under-resourced students, and the average financial aid-packages students receive, including Pell-eligible students
- ii. Establish a common, easy-to-understand format for financial information published by post-secondary institutions for students and families
- iii. Create a simpler process for aid application that gives prospective students and families information about post-secondary benefits afforded to them
- iv. Develop strategies to ensure that students and families have relevant information about financial aid packages prior to admission decision deadlines, including early decision deadlines
- v. Require IHEs to publicly provide information on the types of services and supports that are available for students, including students with disabilities, and how students and their families may access these resources
- vi. Provide students receiving Title IV aid for career education credentialing with information that shows both the demand for certain workforce skills and also regional job opportunity assistance options through the federal workforce development system and other assistance programs. Although the current Higher Education Act (HEA) may not grant the Department of Education sufficient statutory authority to include principals in the same manner as teachers, more rigorous and outcomes-driven data collection and accountability should exist for principal preparation programs as well

**c. Focus on Outcomes and Emphasize Pay for Results in ESSA and the Higher Education Act**

In ESSA, America Forward worked closely with lawmakers on the inclusion of Pay for Success provisions. Pay for Success helps drive funding toward high-quality, effective programs that measurably improve student outcomes. We believe that the Pay for Success model is an important element in the shift away from focusing on inputs and outputs and, instead, placing more emphasis on ensuring positive outcomes and results for students. We urge the Department of Education to consider regulations and other guidance that highlight the potential of Pay for Success as an important tool to support the focus on achieving better outcomes and provide information to states and school districts on the development and effective



implementation of Pay for Success models. Additionally, the Department of Education should provide information and clarification on the elements of the comprehensive definition of Pay for Success included in ESSA, specifically on the reference to feasibility studies, rigorous, third party evaluations, and payment allocation.

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**Pay for Results:** An approach to government decision-making that supports policies and funding decisions that focus on results over outputs and inputs, that help unlock siloed resources, and that support development of and access to data.

**Pay for Success:** A type of pay for performance-based contracting between government and service providers in which impact is measured rigorously and government makes “success payments,” or increases a provider’s market share, only when results are achieved within a specific timeframe. Also referred to as Pay for Performance or Outcomes-Based Contracting.

**Social Innovation Financing:** A tool designed to address the payment delays and uncertainties inherent in some forms of Pay for Success contracting. In Social Innovation Financing, private funders, using various financial instruments, provide working capital to service providers with Pay for Success contracts to deliver social, health, housing, community development, and similar services, and those private funders take on the financial risk that the service provider will not meet the level of success necessary to trigger performance payments. Social Impact Bonds are one form of Social Innovation Financing (but are not actually bonds in a traditional sense).

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In the Higher Education Act (HEA), the next Administration can both advance policies that emphasize a focus on outcomes, and support effective Pay for Results strategies that help providers make this transition. In terms of promoting better outcomes, we urge the next Administration to:

- i. Continue to pursue statutory and regulatory changes in the HEA that require accredited and certified post-secondary institutions offering workforce credentialing programs to ensure affordable student access, persistence, and completion at school, and placement and retention in careers for which they were trained, at wages enabling them to repay their student loans. Such policies should be aimed at all higher education providers, whether they are for-profit, nonprofit, or public
- ii. Require the collection and reporting of college enrollment and employment rates for students leaving high school, disaggregated by the high school they graduated from
- iii. Prioritize a portion of federal student aid funding on outcomes through Pay for Success initiatives designed to boost funding for colleges and universities, and programs operated outside of the traditional higher education system, that deliver

on student success outcomes, such as a certain percentage of students achieving a degree, credential, or securing employment

- iv. Upgrade the Department of Education's existing College Navigator website to provide information on outcomes
- v. Update the Department of Education's existing list of Department-wide discretionary grant priorities to include a priority for models that are cost-effective and have a credible evidence base
- vi. Ensure that Title II of HEA and Title II of the Every Student Succeeds Act (ESSA) work in concert with each other and reinforce the same priorities, including: support for high-quality preparation programs that train educators of the caliber we need; investments in professional development (PD), advanced credentialing, and advanced certification to raise expectations for current educators; and development of teachers, teacher leaders, and principals to meet the same high bar as new educators to support diverse learners, including by funding partnerships among high-performing principal preparation programs (including IHEs or nonprofit organizations) and high-need LEAs to create model teacher and principal preparation programs.
- vii. Further improve Teacher Quality Partnership (TQP) grants program by allowing partnerships to focus the underlying programs on teacher leaders and principals in addition to teachers.
- viii. Ensure that required data on teacher preparation programs, specifically, reflects program quality. The evaluation measures for teacher preparation programs should be meaningful and should include both inputs and outcomes to measure the quality of such programs, including teacher performance, the number of recent graduates employed, the number of graduates who become Board certified, the number in high-needs schools, and satisfaction survey outcomes
- ix. Subject to appropriate privacy protections, the Federal Government should amend law, regulations, and access protocols to permit federal, state, and local workforce and education agencies, state and local workforce boards, nonprofit workforce development organizations, social enterprises, and post-secondary institutions certified by the Department of Education for participation in Title IV of the HEA to have access to the National Directory of New Hires and to Unemployment Insurance Wage Records.

In line with the emphasis on outcomes, the next Administration should also:

- x. Create a Pay for Success incentive fund to structure projects and contracts, fund feasibility work, evaluation, and contribute to success payments



- xii. Establish a Pay for Success Pell grant premium paid to accredited and certified post-secondary providers that achieve specified retention, completion, and/or job outcomes among Pell-eligible students, such as the one quarter Pell grant premium proposed and paid for in Senator Wyden's "PARTNERSHIPS" Act
- xiii. Create incentives for states to transition to performance-based funding models for public higher education, which award funding at least partly based on persistence, graduation and other factors, rather than enrollment, while continuing institutional Pell bonuses to prevent exclusionary changes in enrollment practices
- xiii. Allow the awarding of Title IV student aid to credits earned through innovative, evidence-driven approaches like competency-based models, approved dual enrollment and early college high schools, Portfolio Assessment and other Prior Learning Assessment tools, which focus on subject mastery rather than traditional measures of seat-time.

## **2. Reimagine Learning and Leverage Science to Unlock the Potential of All Students**

### **a. Take Promising New Early Learning Science to Scale**

We now know definitively that the first five years of a child's life have outsized influence on all that follows. But more than one million young children born every year will have the odds stacked against them because they are living in poverty. As a result, families living in poverty often don't receive the support for new parents, health care, or early learning programs that would offer them, and their children, a fair start. At the same time, research into early childhood development has led to the development of approaches with the potential to improve outcomes dramatically for young children.

The next Administration should establish a research-based Early Learning Innovation Fund that would leverage partnerships between early childhood researchers and high-reach practitioners, both within and outside the traditional early learning system, to take the latest science to scale and improve effectiveness and efficiency of early learning systems.

### **b. Mitigate the Impact of Trauma & Adversity on Student Learning**

Over the course of the last decade, research on neuroscience has provided new insights into how students learn, and has revealed inadequacies in an education system designed for the average learner. It is clear that there needs to be a continuum of direct student supports at every grade level to counteract the impact of poverty on student learning. This presents an opportunity to transform how school, classroom, and community environments catalyze growth in achievement for all students. Exposure to trauma and adversity can have a devastating impact on children's lives, affecting how they feel, think, learn, and grow. But the challenges of a child's past do not need to dictate her future. The impact of trauma and adversity can be mitigated. The next administration should leverage opportunities to build a powerful knowledge base and widely share the latest science on the developing brain by investing in R&D. Specific priority investments should include support for cross agency collaborations such as the Department of Ed and the Department of Health and Human Services working together to Expand the National Institutes of Health (NIH) Toolbox to



create a supplemental “Brain Development and Learning” toolbox that highlights practical research-based insights useful to educators serving students impacted by trauma and adversity.

**c. Support Personalized Learning**

America Forward strongly supports efforts to leverage personalized learning strategies that can provide students with the individualized supports they need to achieve positive outcomes. We believe ESSA affords states and local school districts the necessary autonomy to develop personalized learning environments, including the innovative assessment pilot and the additional indicators in state accountability systems, as well as other provisions. We urge the next Administration to build on this progress by clarifying for states and districts that school improvement and direct services funding may be used to support personalized learning strategies.

**d. Make Expanded Learning Time Available for All Students**

More than 80 percent of a child’s time from the ages of five to eighteen is spent outside of school. Traditional education systems, including early education systems, are focused on what happens inside the classroom, but a child’s development and success is also significantly impacted by the time they spend outside the classroom, in all the places they learn. Studies show that by the time students reach 6th grade, students from middle class families have likely spent 6,000 more hours learning than kids born into poverty. All students — regardless of income or background — need access to high-quality, real-world learning opportunities and mentorship that can help shape their vision for their lives, and help them develop necessary academic and non-academic skills. We urge the next Administration to make expanded learning time available for all students and ensure schools in low-income communities receive resources and flexibility to expand the learning day, develop learning opportunities during the summer months, and leverage partnerships to bring additional expertise and learning opportunities to all their students.

**3. Leverage Additional Resources and Expertise Through Community Partnerships**

**a. Bring Community Partners Into the Classroom**

Schools cannot and should not be expected to ensure a secure future for all children and youth by themselves. Rather, the most effective schools work with community partners to leverage additional resources and expertise, catalyze innovation and problem-solving, and increase the rate and level of progress for all students. Federal dollars often don’t support the work of these strong partners, due to limited flexibility and a lack of incentives for public schools to spend public dollars this way. Schools should be encouraged to partner with successful programs, and education funding streams should be opened up to high-quality organizations with track records of improving achievement.

When it comes to higher education, the Administration should establish policies that encourage partnerships between IHEs and community organizations and intermediaries – along with relevant definitions – including policies that provide the necessary flexibility, along with meaningful incentives, for IHEs that participate in Title IV to work with community partners and intermediary organizations to help students, especially under-resourced students, address both the academic and non-academic barriers they may face during their post-secondary education careers, including practical barriers like child care, transportation, and housing support. These policies may include:



- i. Incentivizing IHEs that participate in the Title IV program to partner with nonprofit entities or schools to provide supports and services, or strengthen existing supports and services, to ensure that students – especially low-income, students with disabilities, and first generation college students – persist and complete their program of study for a degree or certificate
- ii. Explicitly clarifying the potential role of intermediary organizations, which can connect IHEs to a range of nonprofit and for-profit partners, other IHEs, and community-based organizations
- iii. Ensuring that IHEs work with qualified community partners to train higher education faculty on course designs that are accessible to the range of learners on college campuses, and enable faculty and staff to respond effectively to requests for support and accommodation from students with learning differences
- iv. Providing greater flexibility for Title IV IHEs to engage in partnerships with nonprofit entities focused on both the academic and non-academic barriers students can face during their higher education careers including practical barriers like child care, transportation, and housing support.

#### **4. Ensuring College Access and Success**

##### **a. Reform Student Aid Programs to Reduce Debt Burden**

Federal student aid has been primarily focused on access to, rather than completion of, higher education credentials and degrees. Federal student aid programs should include incentives for IHEs to be more focused on individual attainment of degree and certification programs. As part of this effort, financial aid should be flexible enough to meet unique needs that may arise throughout a student's term, including being able to draw down student aid regardless of current award year limitations to account for anticipated and unanticipated costs of textbooks, transportation, housing, and childcare. Examples of this approach could include:

- i. Restructure Campus Based aid programs under the HEA to partially allocate funds based on degree and certificate attainment
- ii. Ensure loan-forgiveness programs for those entering teaching, especially in high-poverty schools, are generous, simple, and accessible. Teachers in low-income schools need student loan help that covers the first year a teacher enters the classroom, not five to ten years later
- iii. Provide accelerated loan forgiveness – such as three-years of credit for each year of full-time service or enhanced grant aid to students who complete a service year
- iv. Revive the Academic Competitive Grant and base it on a student's demonstrated ability to stay on track to completion in the standard period of time

- v. Restore the year-round Summer Pell Grant Program authority to allow students to accelerate their studies and provide support to early college high school and related programs for low-income and disadvantaged students earlier without taking on additional debt
- vi. Offer lower interest rates on student loans when students select education and training at such high performing post-secondary institutions in industry sectors and skills that are identified as in demand locally
- vii. Ensure student aid is available to students with disabilities who are enrolled but may not take a full course load.

**b. Establish the Accelerating College Access and Success Fund**

Today, a wide range of new approaches are emerging to support underrepresented students through the college application process, provide integrated supports post-enrollment, accelerate time to completion strategies, and form tangible connections with career opportunities. Many of these innovative and effective new approaches are operated by nonprofit and community-based organizations, including service year programs working in multiple school districts and on college campuses. Unfortunately, these nonprofit programs are ineligible for federal support under existing rules and are unable to grow beyond a limited scale due to funding restraints.

In order to grant these programs access to funding, the next Administration should:

- i. Set aside funds from the existing suite of federal college access programs to create an Accelerating College Access and Success Fund that will sponsor grants awarded on a competitive basis for innovative programs that improve the outcomes associated with increasing college access and success by underrepresented students
- ii. Allocate and distribute funds on a competitive basis to college access and success organizations, including nonprofit and community-based organizations that do not currently qualify for federally-supported access programs, but that have demonstrated a promising solution to meet the needs of today's students
- iii. Proportion innovation fund grant sizes to levels of evidence so that the programs with the highest levels of demonstrated success receive the largest grants, or award grants based on Pay for Results principles with programs receiving renewal grants only if they meet specific outcome targets.

**c. Expand Participation in Service Year Programs**

Service year programs benefit communities while providing participants with opportunities for personal growth, as well as with tangible, transferable skills that are valued by employers. Federal policies should promote the role of service year programs, and we urge the next Administration to:



- i. Incentivize the development of a system to award credit for college-level learning gained through a service year or other experience
- ii. Incentivize pathways to entrepreneurship for young people with a service background through a new competitive entrepreneurship program. The program would be open to young people who have served at least one year through a service year program, and one thousand young people would be selected annually based on their past community engagement and the 'Big Bet' they detail in their application
- iii. Provide deferment or forbearance for certified service year programs. AmeriCorps members may receive deferment and are specifically eligible for forbearance of their direct student loans. This benefit should be extended to individuals participating in all service year programs that are certified to conform to requirements essentially similar to AmeriCorps, including privately funded service programs. Service year programs move in and out of AmeriCorps funding streams, or have AmeriCorps funding at one site but not another. This change would help to equalize benefits for corps members regardless of the federal funding status of their programs, thus making it possible for more individuals to serve.