To Working Group 3
From: Buzzy Hettleman
Re: Comments on the draft dated 10/31/18 Oct. 31, 2018

Preface

1. P. 1, end of 2d para, revise to read, "their state and their nation." Hard to remember these days but we’re supposed to be a nation.

2. P. 1, end a sentence or footnote at the end of 4th para to the effect, "While students with the most severe disabilities may not be able to leave high school with a CCR endorsement, the Commission recognizes that these students must be enabled to maximize their potential and achieve alternate high academic standards."

3. P. 2, 1st full para, 1st sentence, substitute "done more to achieve" for "both met and gone on to exceed." Also last sentence, substitute "done more to achieve" for "achieved." I think the substitute words are more measured: i.e., consistent with the evidence at hand and preserve high-performing countries as a bold benchmark.

4. P. 2, 2nd full para, line 3: Substitute "influence" for "outweigh." We don’t know that adequate education of the kind proposed by Commission can’t substantially change, i.e. "outweigh," the family circumstances.

5. P. 2 3rd full para, line 4. Substitute for the word "alternative" which has a specific diploma meaning in Special Education. Perhaps change to "Bridge Project."

6. P. 3, 1st full para. Delete beginning at line 4, "but will be particularly important for students who do not meet the CCR standard by the end of 10th grade." The early warning system and interventions will be equally if not more important beginning in the early grades.

Element 3a

1. Assumption 2c at the top of p. 5. Add something to the effect that these will not required "unless as part of the Governance and Accountability recommendations of the Commission."

2. Assumption 3 at p. 5.
   a. I would incorporate or cross-reference (and reconcile) this with the Governance and Accountability recommendations. This may be particularly true of inspection teams. I think the concept of inspection teams, as so far spelled out in the Governance and Accountability draft, requires more clarity.
   b. Under 3b, reference to "students who are on track" is vague.

I. Assumption 4, b, P. 5, add at the end something to the effect "The assessments should be part of a larger framework of "early warnings" identification and interventions (additional supports) for struggling learners." The early warning systems are more than assessments.
Element 3h

1. Generally I think the Committee is too large (not mean and lean enough) to cut through the bureaucratic maze of agencies and interests.
2. Design Assumptions 5 and 6, P. 9.
   a. Generally I think these should be incorporated in the basic statement of the Committee’s authority under Assumption 2, P. 8.
   b. Assumption 5: perhaps change after “capacity,” “to carry out the Committee’s functions and authority under Design Assumption 2.” As it now stands, the capacity is restricted.

Thanks for considering.

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