

July 30, 2021

Dear Secretary Cardona,

We deeply appreciate the opportunity to review and provide public comment on the Secretary's Supplemental Priorities and Definitions for Supplementary Grants Programs.

Overall, we wish to applaud the Department's thoughtful, systems-level approach to articulating its supplemental priorities. In particular, the emphasis on equity represents a critical focus as we work collectively to ensure our systems are meeting student needs and supporting them to achieve their highest potential. Given the disproportionate impacts that the COVID-19 pandemic is having on communities of color and low-income communities, equitably distributing resources through a systems-level approach will enable states to work toward closing long-standing gaps in access and outcomes that run contrary to the purpose we hope education can play in an individual's trajectory.

Further, we have seen the success of many of the strategies outlined drive Illinois secondary and postsecondary education into greater alignment in service of student success. We strongly believe that college and career pathways, strategic early college credit, and high-quality work-based learning are tools that both prepare students for college and career as well as help drive our economy. Taking a systems-level approach helps build resilience into our systems in advance of unknown challenges of our future. We believe that these investments will be most effective if they encourage innovation while also finding ways to build from existing best practices.

Ultimately, we hope that resources distributed through grants in service of these priorities can both aid our recovery from the COVID-19 pandemic's disruptions as well as put a down payment for long-term success and closing equity gaps for our most historically underserved students.

Below you will find our feedback based on each priority.

Priority #1 – Addressing the Impact of COVID-19 on Students, Educators, & Faculty

Mitigating the impacts of the COVID-19 pandemic on our students, educators, and systems is essential not only to learning recovery, but also to considering how we can build our systems back better. COVID-19 has certainly disrupted traditional education models, opportunities, and outcomes, but it has also spurred innovation. Essential to our recovery and long-term resilience will be finding ways to document the processes and lessons learned from those innovations and maintain shifts that are working better for students than our previous models.

(a) Asset-Mapping & Impact Assessment

We agree that clearly identifying the impacts of COVID-19 and mapping emerging assets is essential. Providing resources to support states in this effort will help them to thoughtfully attend to this without overburdening students, families, and educators in the process. We hope that any grantmaking in this area will also encourage grantees to document innovations and best practices that can be shared broadly in the field for broader adoption.

(f) Technology for Evidence-Based Interventions

We encourage the Department to consider how technology can be leveraged for strategies beyond traditional curriculum and instruction, particularly work-based learning. Some online platforms have offered subsidized or even fully funded access to [virtual work-based learning opportunities](#) during the pandemic. Future investment in such strategies can support longer-term success for students by expanding opportunities for high-quality work-based learning and employer engagement as well as ensuring equitable access to students of diverse backgrounds and resources.

(g) Evidence-Based Acceleration

We are excited to see the Department's acknowledgment of the importance of early college credit strategies in accelerating student success. We encourage the Department to leverage this priority to incentivize State policy and local implementation strategies around automatic acceleration, which help address issues of equity in access to early college credit. Beyond academic acceleration, we believe work-based learning strategies can also help address student learning needs and effectively re-engage them in their college and career pathway.

(h) Evidence-Based Postsecondary Strategies

Given the impact COVID-19 is having on postsecondary enrollment and retention, we hope to see states, communities, and institutions be supported to implement thoughtful policy and practice in service of equitable postsecondary enrollment and success. In Illinois, these strategies begin in secondary with [College and Career Pathway Endorsements](#), strategic early college credit aligned to postsecondary pathways as outlined in our [Perkins Model Programs of Study Guides](#), and transitional instruction that reduces the need for developmental education. We have even seen examples in Illinois where placement policies were relaxed for dual credit coursework due to the pandemic, resulting in better student outcomes as compared to traditional placement methods. At the postsecondary level, incentivizing the use of multiple measures placement policies will help address over-placement into developmental education, which slows students' progression toward their degrees, increases incurred costs, and can contribute to stopping out of education entirely.

Further, our research locally in Chicago on [Middle Skills Pathways](#) indicates that greater systems-level work can be done to promote greater alignment and bridge from non-credit training programs into promising credentials at community colleges that will lead into quality jobs paying a living wage. We encourage the Department to consider how grantmaking can support similar strategies that will support adults without postsecondary degrees to re-engage and advance their skills and careers.

Priority #2 – Promoting Equity in Student Access to Educational Resources, Opportunities, & Welcoming Environments

Our systems have historically produced the inequitable outcomes they have been designed to produce, and thus our strategies must grapple with long-standing barriers to access, support, and success for our most historically underserved students. This is both a moral imperative and an economic one. In an increasingly diverse community, ensuring that each and every student regardless of background or identity has access to high-quality education to develop their skills and prepare for college and career is core to economic growth and resilience.

(1) Rigorous & Engaging Approaches

(i) Student-Centered Models

Student-centered approaches are fundamental to re-envisioning our public education system in service of student success. One of the four core strategies put forth in the Illinois [Postsecondary and Workforce Readiness \(PWR\) Act](#) is competency-based education. The pilots we have seen in Illinois were able to

innovate not only in pre-pandemic times, but also to provide [models for grappling with the impacts and shifts related to COVID-19](#). As the [shift to remote learning made clear](#), competency concepts hold the potential to help us rethink schooling to engage and support all learners better than traditional models by organizing around students, focusing on student engagement, prioritizing mastery over seat time, and using authentic, performance-based assessments.

Additionally, we also encourage the Department to consider how college and career pathways and work-based learning can be included as part of a suite of student-centered approaches that develop the skills and knowledge students need to succeed in college, career, and life.

In Chicagoland, we are capturing these learnings and promoting models of student-centered personalized instruction, competency-based approaches, performance assessments, project-based learning, and other emerging innovations. The newly-launched [Chicago Equity-Centered Innovation Forum](#) provides space for innovators in Chicago and Illinois high schools to share best practices and strategize toward solutions, gain support and guidance from national experts, and investigate implementation models from other Illinois districts and other states. The Forum identifies, supports, and amplifies models for addressing systemic inequities that are unlikely to emerge from schools making more incremental changes. We encourage the Department to support similar communities of practice at the state and national levels and to provide incentives for states to create fertile space for continued innovation.

(iii) Advanced Courses & Programs

We agree that equitable, systemic, and strategic early college credit is an essential, evidence-based approach to driving student success in secondary, postsecondary, and beyond.

In addition to creating the conditions for greater access to early college credit, we believe these strategies are most effective when they are not simply “random acts” of early college credit, but rather strategic courses that will help students accelerate at the postsecondary as outlined in our [Perkins Model Programs of Study Guides](#). These guides incorporate a robust analysis of Illinois postsecondary programs to identify, for each sector, the career-focused dual credit courses that expand student opportunities to pursue degrees and credentials leading to living-wage employment.

Further, we encourage the Department to include strategies such as [transitional instruction](#) which will reduce the need for developmental education at the postsecondary level, a critical lever for postsecondary success.

We also encourage the Department to find ways to systematically position the senior year of high school as an opportunity to accelerate student progressions with early college credit or ensure college readiness through transitional instruction. One such systemic strategy is incentivizing automatic acceleration and placement policies, which can promote more equitable access to early college credit and ensure all students are receiving the support they need to prepare for whatever comes after high school for them.

(iv) Experiential Learning

We view a robust continuum of high-quality work-based learning as a vital component of ensuring students are college and career ready. We recommend building from best practice research and encouraging State policy work that can define and ensure the quality of work-based learning. In Illinois, our [Career Pathways Dictionary](#) includes robust definitions for a full continuum of work-based learning, which helps ensure consistency and quality statewide. EdSystems has also developed resources including the [Career Development Experience Toolkit](#) and its [Companion Piece](#) for opportunity youth to support thinking on higher-intensity work-based learning experiences, as well as a Team-Based Challenges [resource bank](#) that can help with project-based learning strategies. In 2020, we also launched the Illinois Work-Based Learning Innovation Network (I-WIN), which is a community of practice that is catalyzing the scaling of high-quality work-based learning opportunities across Illinois. The Department should consider how funds can be used to help facilitate and support similar models of peer-to-peer learning that will generate sustainable, integrated work-based learning models with effective employer participation and engaging experiences for students.

(v) CTE and Pathways

Career and Technical Education is certainly a valuable delivery model for career-focused instruction and work-based learning, but we encourage the Department to consider how to advance a broader focus on college and career pathways for all students. Further, the Department should consider ways to promote enhanced secondary-to-postsecondary alignment through pathways strategies, as we have demonstrated in our [Perkins Model Programs of Study Guides](#).

(6) Use of Technology

We encourage the Department to add in work-based learning to this section in order to support states to address the all-too-frequent transportation barrier to work-based learning. We have found through the deployment of virtual work-based learning platforms in Illinois and our own organizational experience that it is possible to deliver high-quality work-based learning in a virtual context with the appropriate resources and support.

(9) Multi-language Learners

Illinois has a promising practice for acknowledging the value and importance of fluency in other languages in the [Seal of Biliteracy](#), which appears on high school diplomas in recognition of achieving fluency in English and an additional world language. For SY 2021, an estimated 10,233 students will receive this seal, and a total of 34 languages will be represented.

(10) Community Engagement

Community engagement, particularly by the most underserved students and groups, will be essential to ensuring that policies and practice can drive toward greater equity and remedy long-standing barriers to access and success. The [Illinois 60 by 25 Network](#) was founded in 2012 and supports communities to increase meaningful and equitable postsecondary attainment. This work is facilitated in a number of ways, including peer-to-peer learning where the communities learn from one another about effective strategies, mini-grants and technical assistance to support policy implementation locally, and elevating community practices and experiences to inform State policy. In recognition that the most effective change is grounded in the experiences of and inputs from those most impacted by any system, the Network launched a [Student Advisory Council](#). The Council gathers on a regular basis to share their perspectives to inform the 60 by 25 Network's efforts and statewide policy more broadly, deepen their own knowledge on issues that advance educational equity, and strengthen their understanding of the education policy and practice landscape in Illinois.

Through the 60 by 25 Network and other community-level work, we have seen time and time again the essential role intermediaries play in facilitating collaboration across systems in efforts to drive college and career readiness and success. Intermediaries serve as a trusted bridge across community partners, particularly secondary and postsecondary partners who benefit from facilitated convening around systems alignment efforts in college and career pathway system development, early college credit delivery, and work-based learning. For example, highlighted the roles intermediaries should play in the [Quality Indicators](#) developed alongside Jobs For the Future and ConnectEd in the Great Lakes College and Career Pathways Partnership. Given the importance of local intermediaries, we encourage the Department to consider ways to target funding that can support their work in effectively bridging and aligning secondary and postsecondary partners and facilitating greater community engagement in systems development.

(11) & (12) Justice-Involved Individuals

Individuals impacted by experiences with the justice system should be supported to explore college and career pathways that lead to living wages. This can include both Career and Technical Education as well as broader pathways frameworks. In this effort, the education system should be encouraged to engage

with community-based organizations with experience in the appropriate modalities, wraparound supports, and transitional services to ensure success for the students served. Such organizations often have experience in effective delivery of career advising and work-based learning delivery. Our Career Development Experience Toolkit [Companion Piece](#) outlines valuable tools and approaches for addressing the needs of Opportunity Youth that are not currently engaged in traditional education models.

As the Department considers models for supporting justice-involved individuals, it should consider the role non-credit programs can serve as an on-ramp to a college and career pathway for individuals exiting the justice system. Our local research in Chicago on [Middle Skills Pathways](#) indicates that greater systems-level work can be done to promote greater alignment and bridge from non-credit training programs into promising credentials at community colleges that will lead into quality jobs paying a living wage.

(13) Increasing Diversity through (i) High-Quality Data Collection

At EdSystems, one of our core areas of focus is Data Impact and Leadership. This work happens both at a statewide, administrative level as well as through deep collaboration with communities. What we have learned is that not only are resources needed to enhance data collections and linkages through resources such as the [Illinois Longitudinal Data System](#), but also that communities need supports and resources to build their capacity to collect and utilize college and career readiness data, particularly disaggregated to identify equity gaps and opportunities. As we describe in our [December 2020 report](#), many communities face challenges with collaboratively reviewing data across essential partners in secondary, postsecondary, and beyond. As with broader college and career readiness, intermediary organizations can play a valuable role in facilitating such collaborative data engagement given their role as conveners. We encourage the department to not only consider the data infrastructure required for robust analysis and decision making, but also the resources needed to enhance community capacity to collaborate around and analyze their data, including funding professional development and intermediary organizations.

Priority #3 – Supporting a Diverse Educator Workforce & Professional Growth to Strengthen Student Learning

Illinois, like many other states, faces a teacher shortage that is particularly acute in rural and urban classrooms. The state's teaching ranks also lack needed diversity: the teacher workforce is 85% white even as mounting research shows students of color benefit from having teachers of color and as the state's school population increasingly diversifies. Essential to delivering on the promise of all the other strategies outlined in these proposed priorities is a diverse and prepared educator workforce.

(a) Increasing Qualified Candidates

To help address the educator shortages in Illinois, the Illinois P-20 Council, The Joyce Foundation, and EdSystems partnered in May 2019 to launch [Scaling Education Pathways in Illinois \(SEPI\)](#). The initiative is funding 15 communities to build streamlined teacher career pathways that begin in high school, extend into postsecondary, and allow students to get on a strong path to a teaching license. SEPI has a special focus on helping students from diverse backgrounds become educators. This career pathways approach enhances the student experience by bringing secondary and postsecondary partners together in partnership to create more seamless, contextualized learning opportunities. Rockford, IL is representative of many Illinois school districts, where their [educator pathway work](#) is a strategy to not only develop local teacher talent pipelines, but also to retain those educators locally. Further, SEPI has generated tangible "[currency](#)" such as scholarships or preferential admissions policies for students earning these College and Career Pathway Endorsements to incentivize student transitions to and through postsecondary and into the workforce.

As the Department considers how to incentivize models such as SEPI, we encourage thoughtful consideration of how these college and career pathways systems can be developed such that students are supported to efficiently progress through career-focused instruction and work-based learning to prepare them as educators. One resource to guide this planning is the recently published [Perkins Model Programs](#)

[of Study Guide in Education](#) developed in deep collaboration with secondary and postsecondary education partners. This Guide is grounded in a deep analysis of postsecondary programs and includes concrete recommendations about strategic early college credit courses that will support efficient progression at the postsecondary level.

(b) Addressing Acute Shortages

In Illinois, two critical shortages in our educator workforce are qualified dual credit instructors and Career and Technical Education educators. Supporting educators to pursue the necessary certifications to teach in these areas will be essential to meeting student needs with coursework that will help them accelerate toward their career areas of interest. Additionally, the Department should consider how, beyond grantmaking, policy can be supportive of recruitment, training, and retention of educators in these areas.

(e) Financial Incentives

Becoming an educator, particularly in a high-need region or field, should not result in paralyzing financial debt. In Illinois, the [Minority Teachers of Illinois Scholarship](#) and [Golden Apple Scholars](#) provide vital financial support to future educators. In addition to these dedicated funding streams, developing postsecondary institutional currency for completion of educator pathways at the secondary level can help incentivize scaling of those efforts that will enhance the teacher pipeline more broadly. One such example is the [Northern Illinois University Educate and Engage](#) program, which will automatically advance students having earned Illinois' [College and Career Pathway Endorsement](#) as finalists to receive select scholarships and to participate. Chicago State is offering the [equivalent opportunity](#) for their Diverse Scholars In Education and Call Me Mister programs.

Priority #4 – Meeting Student Social, Emotional, & Academic Needs

We applaud the Department's inclusion of real-world, hands-on learning (#5) as a core lever for addressing student needs. Incorporating thoughtfully designed work-based learning along a continuum of intensity and exposure will help students build [technical and essential employability skills](#) and social capital that will empower them long-term as they continue along their college, career, and life pathways.

While work-based learning is a valuable strategy, it is most effective when deployed in a systematic manner that is equitably accessible. As programs are developed and grants are made, we hope that the Department provides incentives to connect work-based learning to career-focused instruction and a broader suite of strategies to increase college and career readiness overall. In Illinois, our [Career Pathways Dictionary](#) articulates a work-based learning continuum that is deeply connected to broader strategies around college and career preparation. Our [Postsecondary and Career Expectations \(PaCE\) framework](#) places career exploration and development alongside activities to develop awareness and exposure to financial aid and literacy concepts as well as postsecondary education and training exploration. In considering inclusivity, we have developed resources including the [Career Development Experience Toolkit](#) and its [Companion Piece](#) that help organizations develop high-quality, equitably accessible work-based learning opportunities in a variety of contexts.

Priority #5 – Increasing Postsecondary Education, Access, Affordability, Completion, & Post-Enrollment Success

(a) Partnership

We encourage the department to not only encourage, but truly emphasize partnership through this proposed priority. The challenges we see in our education system, particularly equity gaps throughout the P-20 pipeline, cannot be solved by unilateral action alone. Effective strategies will smooth transition points for students and will reduce barriers to access. This is particularly acute when considering issues around delivery of early college credit and reducing the need for developmental education.

(b) Reducing Cost with Clearer Pathways

We strongly support this element of the proposed priority and encourage the Department to expand this section to emphasize the role of early college credit and broader college and career pathways system development in clarifying those pathways. One robust example of this type of work in practice is the set of [Perkins Model Programs of Study Guides](#) that have been described elsewhere in this comment.

(e) Data

We greatly support the need for robust data resources and encourage the Department to require alignment of data-related efforts to statewide goals (e.g., for postsecondary attainment), particularly with an eye toward measuring equity gaps and identifying strategies for ongoing monitoring and accountability. As mentioned above, supporting capacity-building for engaging with data would be valuable in this area as well.

(f) Integrated Approaches

We encourage any efforts around integrated approaches to consider how they can be tied into broader college and career pathway system development. This includes guided pathways generally, but also CTE and bridge programming that can accelerate students toward success while addressing their skills and interests.

(g) Re-Engagement of Adults

Re-engaging individuals who have not completed postsecondary degrees or credentials is vital to reaching postsecondary attainment goals and meeting the needs of the workforce. Such strategies should meet students where they are at, including bridge or integrated education and training, as well as finding ways to financially support individuals to return. As noted previously, supporting systemic alignment for alternative pathways such as non-credit workforce training and education programs into traditional postsecondary can also help reconnect adults.

(i) Career and Technical Education

As described at length elsewhere in this comment, we urge the Department, policymakers, and local stakeholders to implement CTE models that are grounded in labor market information and aligned from secondary to and through postsecondary as outlined in our [Perkins Model Programs of Study Guides](#).

(j) Essential Skills for Success

We agree that grounding work in development of essential and technical employability skills, as well as entrepreneurial skills, can help individuals transition smoothly into the world of work and civic life. To that end, Illinois has adopted [essential, technical, and entrepreneurial competencies](#) that were developed in close collaboration with employers and education partners. These competencies can guide curriculum development as well as guide work-based learning opportunities. One local application of these competencies is the Greater Peoria Essential Abilities and Knowledge ([GPEAK](#)) initiative, which is a regional approach for assessing and validating essential skills needed in the workplace that spans education and workforce training programs.

Priority #6 – Strengthening Cross-Agency Coordination & Community Engagement to Advance Systemic Change

As shared above, we believe communities of practice and local intermediary models are essential to facilitating systemic change through peer-to-peer learning, fostering collaboration, and investigating and implementing innovative frameworks. The [Illinois 60 by 25 Network Leadership Communities](#) are an

example of the power of convening communities utilizing a collective impact model for driving systemic change.

Further, the level of cross-sector commitment they are required to demonstrate to become a Leadership Community facilitates the use of strategies such as mini-grants distributed in support of local policy implementation. They show this commitment by:

- Documenting a partnership involving employers, workforce boards, education, municipal leadership, and community-based organizations.
- Capturing and using data for continuous improvement.
- Developing a plan to implement key strategies for increasing meaningful and equitable postsecondary attainment, including:
 - Aligning student transitions through postsecondary education and into a career
 - Implementing locally prioritized college and career pathway systems.
 - Supporting implementation of real-life learning.
 - Proactively considering equity in the design and implementation of strategies.
- Defining a geographic community of focus.
- Identifying a trusted intermediary organization to help build a common agenda with a shared measurement system, harmonize mutually reinforcing activities, measure progress, and foster communication among partners.

We encourage the Department to proactively identify existing intermediaries as an example of organizations that facilitate the type of collaboration and holistic efforts described in Priority 6. Further, the Department should consider incentivizing, supporting, and scaling networks similar to the Illinois 60 by 25 Network that serve as vital spaces for learning and incubating innovative practices.

Proposed Definitions

In Illinois, we have greatly benefited from clarity in definitions and terminology that can support greater collaboration and alignment in service of student success and are thus encouraged by the definitions proposed in these proposed priorities. In particular, the specificity around “Underserved Students” will support states and communities to be explicit about what equitable education systems include and how they serve students from the lived experiences outlined, many of which intersect. In particular, we acknowledge the inclusion of adults and student parents, as well as “a student performing significantly below grade level(s).” This latter inclusion acknowledges the role and responsibility of the system in leading a student to perform at that level and emphasizes the responsibility of policymakers, educators, and other stakeholders in changing the trajectory.

Thank you again for the opportunity to offer input into these proposed priorities. We look forward to seeing this critical work come to life with the support from the Department.

Sincerely,



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