



September 7, 2010

The Honorable Arne Duncan  
Secretary  
United States Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

In re: *Secretary's Priorities for Discretionary Grant Programs* (Docket ID ED-OS-2010-0011)

Dear Secretary Duncan:

On behalf of the State Educational Technology Directors Association, I am writing to submit comments responding to the U.S. Department of Education's (ED) recent Notice of Proposed Priorities ("Notice") for future discretionary grant programs.

Founded in 2001, the State Educational Technology Directors Association (SETDA) is the national member association that represents the interests of the educational technology leadership of state and territorial education agencies in all 50 states, the District of Columbia, and the Bureau of Indian Affairs. SETDA members work collectively and in public-private partnerships to ensure that meaningful technology innovations with broad potential for systemic improvements and cost-savings in teaching, learning, and leadership are brought to scale.

Based on numerous public statements and documents disseminated both by the White House and the Department, SETDA had every expectation that technology would be included not only as an independent cross-cutting priority for future discretionary grant programs, but also incorporated into all other priorities, as appropriate. For instance, in the *ED Blueprint for Reform*, technology is listed as the *first* cross-cutting priority:

*(1) Technology. Technology, effectively and thoughtfully deployed, can improve how schools work, how teachers teach, and how students learn. Priority may be given to programs, projects, or strategies that leverage digital information or communications technology to accomplish the stated goals of the grant (p.41).*

We write with comments because we are deeply concerned about this omission and would like to take this opportunity to recommend strategies for strengthening the Notice, including proposing a new priority.

**Proposed New Priority – Technology, Innovation and School Reform:** We concur with recent remarks you made at the Rural Education Technology Summit on July 21, 2010: “Just as technology is transforming the way we do business and relate with others—so too technology can dramatically change the way teachers teach and children learn.” Innovative states and

districts are employing technology across the full range of school reform and improvement issues to meet our longstanding goals for public education, but much work remains to be done. We believe that investments in technology for learning represent a new baseline infrastructure for education, including investments in the human resources necessary to make best use of the new tools and services enabled by this infrastructure. Under this priority, projects designed to support innovative approaches to school reform could focus on one or more of the following priority areas:

- (a) Transitioning from print to digital instructional materials, including especially those employing open educational resources;
- (b) Accelerating the adoption of high-quality online formative and summative next generation assessment systems;
- (c) Increasing the availability of online and blended opportunities for students, especially where educational opportunities are limited by geography or personal circumstance
- (d) Fostering 21<sup>st</sup> century, personalized learning environments centered on improving student achievement in the core subject areas through the acquisition and demonstration of higher-order thinking, creativity, communication, and collaboration skills.
- (e) Providing professional development to educators and school leaders to assist them in effectively selecting, using and evaluating the effectiveness of technology tools and information systems.

**Priority 1 – Improving Early Learning Outcomes:** We concur with the findings of the draft ED National Education Technology plan (<http://www.ed.gov/technology/netp-2010>), which recognizes the contribution technology can make to early learning, early intervention and school readiness. Research on the positive impact and importance of technology on early learning has been assembled by organizations such as the National Association for the Education of Young Children (<http://www.techandyoungchildren.org/research.html>) and the Joan Ganz Cooney Center at Sesame Workshop (<http://www.joanganzcooneycenter.org/>). We would recommend that projects funded under this priority be encouraged to employ age-appropriate technologies that support young children’s (preK-3) development.

**Priority 2 – Implementing Internationally Benchmarked College and Career-Ready Elementary and Secondary Standards:** We agree that states' shift to college and career ready standards will catalyze, accelerate and support many other core education reforms. We strongly believe that one of the reasons that such reforms will succeed is because of inter-state collaboration to scale up promising practices, which will be enabled by new investments in technology platforms and infrastructure. Whether to aid in the development of instructional materials and open educational resources, next generation assessments, or high-quality professional development, projects under this priority should be encouraged to bring standards implementation efforts to scale through new investments in digital resources, online communities, and infrastructure.

**Priority 3 – Improving the Effectiveness and Distribution of Effective Teachers or Principals:** Research shows that teachers matter most to student success. Yet, we remain challenged to provide high-quality professional development opportunities to all teachers and to ensure that students not be penalized by accidents of geography that rob them of access to effective teachers with specialized skills and knowledge. Under this priority, projects should be

encouraged to employ online professional development, foster online communities of practice, and increase the availability of online courses and content not otherwise available locally (and especially in rural settings).

**Priorities 4 & 5 – Turning Around Persistently Lowest Achieving Schools and Improving Postsecondary Success:** We support the Department's decision to highlight the importance of strengthening school staff and instructional programs to help turn-around the nation's persistently lowest achieving schools and strongly support President Obama's goal of making the United States first in the world in the percentage of citizens holding college degrees or other postsecondary credentials. Under these priorities, projects should be encouraged to employ technology to increase the capacity of schools to improve student achievement and graduation rates by providing innovative services and support to educators, students, and families via technology. This work could and should build upon one-time ARRA research and development investments designed to meet these goals.

**Priority 6 – Improving Achievement and High School Graduation Rates of Rural and High-Need Students:** In remarks delivered at the Rural Education Technology Summit, you stated that “it should be clear to all of us that technology is a vital ingredient in our work to build a public education system that helps all students set goals, stay in school, earn a high school diploma, and secure college and career success. And it's clear that technology can and will overcome the challenges of providing a world-class education in rural America.” This statement helps address the concerns raised by 22 U.S. Senators who wrote to ED in February regarding the needs of rural communities, asserting that “strategies such as distance learning provide a greater opportunity for rural and frontier districts to address education standards, including student achievement and professional development.” We recommend that projects under this priority should be encouraged to employ online and blended learning opportunities for students, educators and schools leaders in rural communities.

**Priority 7 – Promoting Science, Technology, Engineering, and Mathematics (STEM) Education:** Increasing the number of students well-qualified for STEM careers, particularly among those under-represented in these careers, is an important goal and one that we support. Under this priority, projects should emphasize increased access to the full range of tools and processes employed by practicing STEM professionals – including access to experts via online and distance learning.

**Priority 10 – Enabling More Data-Based Decision-Making:** We strongly support the Department's emphasis on increasing the capacity of states, districts, schools, teachers, students, and families to make meaningful use of educational data.

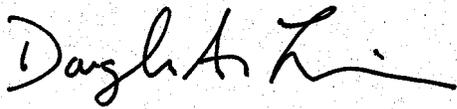
**Priorities 11 & 12 – Building Evidence of Effectiveness and Supporting Programs, Practices, or Strategies for Which There is Strong or Moderate Evidence of Effectiveness:** We concur with the recommendations of the draft ED National Education Technology plan (<http://www.ed.gov/technology/netp-2010>), which call for substantial investments in research and development on technologies for teaching, learning, assessment and productivity. Projects under these priorities should include an emphasis on building the knowledge base on the effective uses of technology in education.

**Priority 13 - Improving Productivity:** We appreciate the Department's decision to prominently feature both technology and open educational resources (OER) in Priority 13, but do not believe that their inclusion in this priority is sufficient. Moreover, we believe that the Notice's definition of "Open Educational Resources" could be strengthened. The Department defines OER as follows. "Open educational resources (OER) means teaching, learning, and research resources that reside in the public domain or have been released under an intellectual property license that permits their free use or repurposing by others." We recommend strengthening the definition by: (1) replacing the conjunction "or" with the conjunction "and" to ensure that derivative use is clearly allowable; and (2) replacing the phrase "permits their free use or repurposing by others," with the phrase, "permits sharing, accessing, repurposing (including for commercial purposes) and collaborating with others." Under this approach, the revised definition would read as follows:

*"Open educational resources (OER) means teaching, learning, and research resources that reside in the public domain or have been released under an intellectual property license that permits sharing, accessing, repurposing (including for commercial purposes) and collaborating with others."*

Thank you again for providing this opportunity to provide feedback on the Notice. We would be pleased to answer any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas A. Levin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Douglas Levin  
Executive Director