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August 19, 2009

Honorable Arne Duncan  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

RE: Race to the Top Fund Comments

Dear Secretary Duncan:

The National Association for Gifted Children (NAGC), the largest national organization dedicated to training teachers, encouraging parents, and educating administrators and policymakers on how to develop and support gifted and talented children, submits the comments below in response to the July 29, 2009, *Federal Register* Notice of Proposed Priorities for the Race to the Top Fund.

As policy makers have come to understand, the accountability provisions in *No Child Left Behind* (NCLB) have had negative consequences for the nation's advanced students whose educational needs too often have been marginalized as schools strive to address the needs of below-proficient students. It should be no surprise that the growth in achievement of high-performing students has been essentially flat in the NCLB era.

NAGC urges the Secretary to use the Race to the Top Fund to encourage state policies and practice that support advanced students by recognizing their unique learning needs. These differences require flexibility in curriculum delivery and course planning to ensure that they receive appropriately challenging learning experiences. We recommend an emphasis in four of the priorities enumerated in the Notice of Proposed Priorities.

**(1) NAGC strongly supports use of Race to the Top Fund dollars as incentives for school districts to match students with ability-appropriate curricula. (Priority 5: School-level Reform and Innovation)**

Gifted and talented children are, by definition, ahead of their age peers in one or more subject areas. However, K-12 districts remain locked in an outdated service delivery mode, where curriculum is matched to a student's age rather than to his or her ability. Indeed, many advanced elementary students already know 50% of the material to be covered before the school year begins. As advanced students pursue their area of passion independently, and acquire greater knowledge, skills, and understandings in a content area, they become even farther out of sync with the curriculum planned for their age group, resulting in wasted time covering material they already know and a corresponding lack of educational progress. Interestingly, one strategy that could help ameliorate this problem – implementation of one or more content or grade-based acceleration strategies – is often not available due to school policies and practices linked to strict graduation or subject area requirements.

Although several states specifically prohibit proficiency-based promotion, NAGC supports the proposed use of federal funds to encourage grantee states to allow proficiency-based promotions in content areas based on the results of an end-of-unit test, end-of-year test, or portfolio. We also recommend that these

state policies enable students to receive high school graduation credit or credit towards subject area requirements for their demonstrated proficiency.

NAGC also urges the Race to the Top Fund be used to encourage state policies that allow middle or high school students to receive high school graduation credit or to meet a subject area requirement earlier than typically would be expected. This accelerative strategy could be accomplished by middle school students taking approved high school curriculum in person or online, or by high school students taking an approved in-person or Internet-based university or college course.

***(2) NAGC proposes an emphasis on closing the achievement gap between the highest performing disadvantaged students and their more advantaged peers. (Priority 1: Reform Areas)***

Although the intent of NCLB is to close the achievement gap; there has been precious little attention on supporting highly able students from disadvantaged backgrounds. Recent research shows that the achievement gaps in reading and math skills between Kindergarten and fifth grade grow roughly twice as fast for students who begin school with scores one standard deviation above the mean as they do for those who begin one standard deviation below the mean. This trend is especially stark between high-achieving African-American and White students. Additionally, half of lower-income students who were classified as high-achievers in math early in their schooling lost this status before the end of elementary school. Essentially, high achievers lose more ground the longer they attend school. The achievement gap exemplifies the socio-economic divide we face as we struggle to address vexing poverty and unemployment issues. The nation has an interest in providing leadership and resources to develop the talent of the best and brightest students from all population subgroups, particularly high-potential educationally disadvantaged students who are underserved by the nation's public schools.

NAGC urges the Secretary to use the Race to the Top Fund to encourage states to address the achievement gap between high-achieving, educationally disadvantaged students and their more advantaged peers. We recommend the implementation of interventions focused on students entering first grade who perform in the top decile on achievement assessments with continued services and strategies through the elementary grades to ensure that their rate of growth in academic achievement is comparable with that of their more advantaged high-performing peers. We also recommend that states collect program and achievement data for this population of students in order to make program improvements and to facilitate replication of model programs.

***(3) NAGC proposes an emphasis on making high-level STEM curriculum available to some learners at earlier grades than the norm. (Priority 2: Emphasis on STEM)***

Since Sputnik, the nation has recognized the need to cultivate its brightest students. However, federal and state policies and practice fail to support that goal in K-12 education, where the pipeline of advanced talent begins. Too many gifted and talented students sit unchallenged and uninterested in regular education classrooms across America while teachers repeat concepts for students struggling to learn.

NAGC urges the Secretary to use the Race to the Top Fund to create incentives to districts to offer advanced coursework to those students who are capable of handling more difficult material than is provided in the regular curriculum. There are a host of research-based practices that allow districts to accelerate the course content for advanced students who require a challenge greater than the regular curriculum. Unfortunately, many local policies and practices inhibit acceleration options. For example, most gifted students would benefit from Advanced Placement curriculum at no later than 9<sup>th</sup> or 10<sup>th</sup> grade, although they are often precluded from taking these advanced courses until 11<sup>th</sup> grade. Virtually all gifted math students are ready for high school mathematics much earlier than ninth grade, yet obtaining graduation credit for coursework taken before a student is enrolled in high school is often difficult. The Race to the Top Fund could reward applicants that develop and implement policies that direct districts to be flexible about the delivery of coursework, rather than allowing the age of the student to dictate the courses available.

Additionally, NAGC urges the Secretary to use the Funds to encourage states to open statewide, public, residential high schools that focus on math and science. Provisions in the *American Competes Act* contemplated federal support for these high schools, but the funds have not been forthcoming. Approximately 15 states have high schools that allow students to take highly advanced courses in math and science. Many of the high schools are located on college campuses, which allows the students to take college courses as their high school curriculum, resulting in both a high school diploma and an associate's degree after a two-year course of study. Clearly, advanced math and science students in every state, particularly those from districts that do not offer more than one or two advanced courses, would benefit from a similar opportunity.

**(4) NAGC proposes including data on students served in gifted education programs or receiving advanced coursework in state longitudinal data systems. (Priority 3: State Longitudinal Data Systems)**

Data on gifted and talented students is not collected at the federal level, nor is detailed information collected in many states. As a result, not only do we not know how well this population of children is performing in the nation, it is not possible to make large-scale policy and practice recommendations about which interventions are successful or which services are most needed at specific junctures in a student's career.

NAGC urges the Secretary to require grantee states to expand their longitudinal data systems by including data about gifted and talented students in order that states will be able to measure their learning gains and develop information about successful curriculum interventions.

We thank you for the opportunity to comment on the proposed priority and we welcome the opportunity to discuss these issues further with you.

Sincerely,

Del Siegle, Ph.D.  
President