

April 16, 2015

Office of Innovation and Improvement  
Attention: Investing in Innovation Comments  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 4W321  
Washington, DC 20202

Re: Comments on Investing in Innovation Proposed Priority

Dear Assistant Deputy Secretary Dabby,

On behalf of the undersigned members of the National Coalition on School Diversity (NCSD), we are writing to comment on the Department of Education's new proposed priority for the Investing in Innovation Fund ("i3"), set out at 80 Fed. Reg. 13803 (March 17, 2015).<sup>1</sup>

The NCSD has previously submitted multiple comments suggesting that the Department include "reduction of racial and socioeconomic isolation of students" as a priority in the i3 program,<sup>2</sup> and in December 2014, the Department again recognized the promotion of diversity as a general funding priority for its K-12 grant programs, and expanded that focus to include socioeconomic as well as racial diversity (79 Fed. Reg. 73426, 73452).

Thus, we are dismayed by the repeated exclusion of school diversity from the i3 priorities, since school diversity is a central departmental priority and is perfectly aligned with the stated goals of the i3 program. It is time to rectify this oversight.

Including an explicit priority for increasing racial and socioeconomic diversity and combating racial and socioeconomic isolation within the "Proposed Priority – Implementing Comprehensive High School Reform and Redesign" would serve the purpose Congress articulates: to "*increase the number and percentage of students who graduate from high school and enroll in postsecondary education without the need for remediation and with the ability to think critically, solve complex problems, evaluate arguments on the basis of evidence, and communicate effectively.*"<sup>3</sup> A growing body of research strongly suggests that racial and socioeconomically diverse high schools are associated with student achievement, particularly in math and science, higher graduation rates, critical thinking skills, and success in postsecondary education for students of all racial and ethnic backgrounds<sup>4</sup> Furthermore, inclusion of the diversity priority in

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<sup>1</sup> <http://www.gpo.gov/fdsys/pkg/FR-2015-03-17/pdf/2015-05956.pdf>

<sup>2</sup> [www.school-diversity.org/pdf/InvestinginInnovation.pdf](http://www.school-diversity.org/pdf/InvestinginInnovation.pdf), [www.school-diversity.org/pdf/i3\\_comment\\_letter-2-9-2011.pdf](http://www.school-diversity.org/pdf/i3_comment_letter-2-9-2011.pdf), [http://www.school-diversity.org/pdf/Investing\\_in\\_Innovation\\_comments\\_-\\_school\\_diversity\\_priority.pdf](http://www.school-diversity.org/pdf/Investing_in_Innovation_comments_-_school_diversity_priority.pdf)

<sup>3</sup> 80 Fed. Reg. 13803, 13804, available at <http://www.gpo.gov/fdsys/pkg/FR-2015-03-17/pdf/2015-05956.pdf> (emphasis added). See Representative Rodgers (KY). "Statement Regarding the House Committee on Appropriations Regarding the House Amendment to the Senate Amendment on H.R. 83." *Congressional Record* 160:151, (October 11, 2014), p. H9840, available at <https://www.congress.gov/crec/2014/12/11/CREC-2014-12-11-pt2-PgH9307.pdf>

<sup>4</sup> See Roslyn Mickelson, "School Integration and K-12 Educational Outcomes: A Quick Synthesis of Social Science Evidence" (National Coalition on School Diversity, 2015), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo5.pdf>.

the new proposed priority is congruent with Congress's directive that the i3 program focus on schools where not less than 40 percent of students come from families earning low incomes, since such schools are good candidates for socioeconomic integration.

We encourage the Department to revise the proposed priority for the i3 program to include an explicit focus on combating racial and socioeconomic isolation, which would help the program meet the goals laid out by Congress for FY 2015. Thank you for the opportunity to present these comments, and please let us know if you need additional information. We would be happy to consult with the Department further on the issues addressed in this letter.

Sincerely,

Philip Tegeler  
Michael Hilton  
Poverty & Race Research Action Council  
Washington, DC

Gary Orfield  
Civil Rights Project/Proyecto Derechos Civiles  
University of California, Los Angeles  
Los Angeles, CA

john a. powell  
Haas Institute for a Fair and Inclusive Society  
University of California, Berkeley  
Berkeley, CA

Susan Eaton  
Charles Hamilton Houston Institute for Race and Justice  
Harvard Law School  
Cambridge, MA

Ted Shaw  
University of North Carolina Center for Civil Rights  
Chapel Hill, NC

Genevieve Siegel-Hawley  
Virginia Commonwealth University  
Richmond, VA  
(University affiliation listed for identification purposes only)

cc: Deputy Secretary John King