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**Kentucky Education Association**

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August 28, 2009

Via eRulemaking Portal: [www.regulations.gov](http://www.regulations.gov)

The Honorable Arne Duncan

United States Department of Education

c/o Office of Elementary and Secondary Education

Attention: Race to the Top Comments

400 Maryland Avenue, S.W., Room 3W329

Washington, DC 20202-6200

Re: Race to the Top Fund [Docket ID ED-2009-OESE-0006]

On behalf of our 41,000 members, the Kentucky Education Association appreciates the opportunity to comment on the Notice of Proposed Priorities, Requirements, Definitions, and Selection Criteria published on July 28, 2009, *Federal* *Register* regarding the Race to the Top Fund.

KEA supports improvements in the four areas of school transformation that the Race to the Top Program focuses on (improvements in standards and assessment, effective teachers and principals, data systems, and low-performing schools).

In particular, KEA was instrumental in the passage of key legislation during the 2009 session of the Kentucky General Assembly. That legislation caused Kentucky to begin a process of examining and reformulating our learning standards, student testing and accountability systems. This work by our Association directly evidences our commitment to improvements in standards and assessment, data systems and help for struggling schools. In addition, KEA has a long history of supporting effective teaching and high standards for our profession. KEA was the major backer of legislation that created the Kentucky Education Professional Standards Board, which has raised teaching quality and ethical standards among Kentucky teachers.

While we support aspects of the proposed Race to the Top Program requirements, we offer one specific suggestion to make it more effective:

*In its emphasis on encouraging states to step up their efforts to turn around struggling schools, the Department should be open to other models of innovation and not focus so exclusively on charter schools.*

While some charter schools may work well in some communities, in Kentucky we have pursued another avenue for encouraging innovation, giving schools autonomy, and relieving schools of excessive regulation that stands in the way of innovation.

The landmark Kentucky Education Reform Act includes a model of school governance that can accomplish all the promised benefits of charter schools. Because of Kentucky’s system of school-based decision making (SBDM), charter schools have not gotten traction in our state.

School councils have broad autonomy and authority to adopt policy in most areas that affect student learning, including:

* Closing achievement gaps
* School improvement
* Professional development
* Use of staff time
* Use of the school facility
* School day schedule
* Instructional practices

Further, school councils select each school’s principal.

SBDM is mandatory in all Kentucky schools, in keeping with the administration’s desire to have no limits on innovative models of school governance. Upon request, school councils can also be granted waivers of many state laws and regulations regarding education.

School councils are composed of three teachers (selected by their peers), two parents (selected by parents), and the school principal. Councils generally work through committees, which include all the school’s stakeholders.

Certainly, school councils have not lived up to all of the high expectations when they were created nearly twenty years ago. The Kentucky Education Association hopes that assistance through the federal Race to the Top program can help our state establish more effective models for optimizing the promise of SBDM, not create an entirely new model of school governance. We’ve built too many effective school councils and have too much history of excellence in raising student achievement, partly through SBDM, to abandon that now. We hope our state can build on our success and challenge ourselves to achieve even more through Race to the Top.

Thanks very much for your consideration of this suggestion by the Kentucky Education Association.