Education Interest Groups: The Influence of Networks on Rulemaking and Policy in Public School Reform

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EDUCATION INTEREST GROUPS:
THE INFLUENCE OF NETWORKS ON RULEMAKING AND POLICY IN PUBLIC SCHOOL REFORM.

by

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1991

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A dissertation submitted in partial fulfillment
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THE GRADUATE COLLEGE

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ABSTRACT

Education Interest Groups: The Influence of Networks on Rulemaking and Policy in Public School Reform

By

Brian Curtis Myli

Dr. Edith Rusch, Examination Committee Chair
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University of Nevada, Las Vegas

A problem for educators and scholars is that there is little understanding of how the agendas of particular interest groups reflect the intent of federal agencies or lawmakers as education policies take shape during the rulemaking process. As a result, it is difficult to determine whether federal education policy is influenced by outside interest groups. The purpose of this study was to provide an understanding of the influence of interest groups during the informal stage of federal rulemaking in education policy. The research questions being examined include: 1) In what ways do different influence the rulemaking process in the development of federal education policy? and 2) In what way does the rulemaking process support or reinforce democratic principles? This qualitative research study was framed by a collective case study design. Purposeful sampling was used to examine 3 education interest groups who made public comment on the U.S. Department of Education’s Race to The Top education policy. Discourse analysis was utilized to collect data on selected interest groups. A questionnaire and/or interview was incorporated to collect data from select individuals within participating interest groups.

Data collected was analyzed using the Complementary Action Research Matrix Application to compare expected policy outcomes with evident policy outcomes.
Utilizing agenda setting and sensemaking models as analytical frameworks, interviewed interest group participants were asked about the expected and evident outcomes of the *Race to The Top* policy, their perspective on the federal rulemaking process, their organizational ideological stance, and the decision-making process used to determine involvement in education policy matters. The findings indicated that interest groups who are members of networks and those who are rich in resources such as data and research were more likely to influence federal education policy. In addition, the democratic principles of legitimacy and acceptance were found to be supported by the results of this study. Credible interest groups with robust public documentation of resources and membership in state networks took the opportunity to participate in the shaping of education policy. The findings of this study supported a changing educational polity and a new strategy in federal education policy.
ACKNOWLEDGEMENTS

I want to sincerely thank the members of my dissertation committee: Dr. Edith Rusch, Dr. LeAnn Putney, Dr. Robert McCord, and Dr. Martha Young. Each of you inspired me, guided me, and supported me in ways too great to express in words. I will always be indebted to Dr. Edith Rusch, my committee chair, for her unwaivering belief in me, for her tireless commitment to my growth as a scholar, and for her patience and kindness throughout this journey.

I could not have completed this dissertation without my education hero, Judi Steele, President and C.P.O. of The Public Education Foundation. Her wisdom, guidance, support, and belief in me will never be forgotten. I offer to you my humble thanks and appreciation for being my kindred spirit and light in my life. I also extend a heartfelt thanks to my colleagues at The Public Education Foundation. Seldom does one have such unselfish support from fellow colleagues that I have experienced throughout this journey. I thank you for your friendship and encouragement each and every day.

Finally, I must thank my immediate and extended circle of friends. I offer special appreciation to Martin Heath, Nick Facciolla, Jeremy Thompson, Andy Lestrud, and Tonia Holmes-Sutton who continue to be my strongest pillars of support. Your unconditional friendship means more to me than you will ever know.
DEDICATION

This dissertation is dedicated to my immediate and extended family. My parents, Russ and Sue Myli, have been my greatest role models, my biggest supporters, and the most loving people in my life. My sister and brother-in-law, Amy and Troy Anderson, have provided me with constant encouragement and motivation to keep going even when the road got tough.

My niece, Aleah Anderson, has given me purpose greater than myself. May your love of learning last a lifetime. May you never lose sight of your dreams. May you always know how much you inspire me.

I am truly blessed to have all of you in my life.
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CHAPTER ONE

INTRODUCTION

Leadership is political and ideological at its very core (Anderson, 2009). Thus, it stands to reason that educational leaders, scholars and policy makers would have an inherent interest in education policies and the role of those policies in current education reform efforts. According to McDonnell (2009), the primary goal of education policy is to impact student learning. The author notes that we as the general public have a responsibility to students to question current education policies to ensure more enlightened and effective policies in the future. Moreover, as a democracy, the citizenry has an obligation to question the manner in which schools are governed, who participates, how resources are allocated, and who benefits from those resources have long-term consequences because they shape the future of our citizenry.

According to Kaestle (2007), education remains a top-tier political agenda item. Yet, what part of the citizenry informs policymakers at the Federal level? This study examines citizens who form special interest groups with the potential to influence federal education policy. Welner (2011) states that “privatization reforms in particular have been offered as the pre-ordained solution for any number of educational problems, from school funding to high school drop-out rates to the weaknesses of the No Child Left Behind Law” (p. 42). The author refers to countless reports and publications written and distributed by interest groups promoting privatization or entrepreneurial practices in the public school reform debate. Gaining a better understanding of the influence of interest groups and their potential influence on federal education policy would help to inform policymakers and scholars.
Purpose of Study

According to Kaestle (2007), interest groups are a critical part of the education polity. Some current public school initiatives promoted by interest groups with a more conservative ideology promote privatization and/or entrepreneurial free-market practices in education (Welner, 2011). Yet, these choice initiatives lack conclusive research evidence (Belfield & Levin, 2005). Some current public school initiatives promoted by interest groups with a more progressive or liberal ideology promote equity and access for all children, citing the principles of democracy on which public education was founded (Welner, 2011). Yet, these initiatives are believed by some to support an education monopoly that limits choice and compromises quality (Kaestle, 2007). A problem for policymakers, scholars and educational leaders is that it is difficult to determine whether federal education policy is influenced by outside interest groups. Moreover, the public sector has little understanding of how the agendas of particular interest groups reflect the intent of federal agencies or lawmakers as education policies take shape during the rulemaking process because there is little research on the impact of interest groups on federal education policy during the rulemaking process. Therefore, the purpose of this study was to provide an understanding of the influence of interest groups during the informal stages of federal rulemaking in education policy.

Federal Rulemaking

In 1946, the Administrative Procedures Act (APA) was enacted, requiring federal agencies to follow specific guidelines so that the government could carry out statutes through the creation of rules. Rules include “the whole or part of an agency statement of
general or particular applicability and future effect designed to implement, interpret, or prescribe law or policy” (APA Section 551). Under APA, agency rules are just as binding as laws. The federal agency rulemaking process is comprised of stages as policy language takes shape. I believed the informal stages were particularly important for the purposes of this study, as they enabled interest groups and the public to have an opportunity to communicate and make recommendations on federal policy.

Forms of administrative rulemaking include: formal, informal, negotiated, and hybrid. Formal rulemaking requires official hearings. Informal rulemaking requires agencies to submit public comments on proposed policies. This study examined the informal rulemaking process. Negotiated rulemaking includes participatory meetings between agencies and stakeholders. Finally, hybrid rulemaking includes both formal and informal processes (Cooper, 2007). It is also important to understand that within the administrative rulemaking processes, there are three types of rules: substantive (legislative), procedural (non-legislative), and interpretive. Section 551(4) of the APA states that substantive or legislative rules are those that “implement…or prescribe law or policy.” As is true with law, substantive rules are binding. Procedural or non-legislative rules are generally policy recommendations or statements made by an agency and are non-binding. Interpretive rules are statements that indicate a federal agency’s understanding or interpretation of a policy rule and are also non-binding.

Table 1
Stages of Informal Federal Rulemaking

<table>
<thead>
<tr>
<th>Informal communication</th>
<th>Advanced Notice of Proposed Rulemaking (ANPRM)</th>
<th>Notice of Proposed Rulemaking (NPRM)</th>
<th>Final Rule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal agency and stakeholders</td>
<td>Stage 1: Pre-Proposal Stage</td>
<td>Stage 2: Notice and Comment</td>
<td></td>
</tr>
</tbody>
</table>

Source: Yackee (2008), modified by author
During stage one, the pre-proposal stage, informal communication between federal agencies and stakeholders takes place. In stage two, or the Advanced Notice of Public Rulemaking (ANPRM), agencies determine the stipulations and requirements to be included in the proposed rule. Once contents of the rule have been fully determined, agencies must publicly announce the proposed rule in the *Federal Register*. Once the rule is drafted, agencies publish a Notice of Proposed Rulemaking (NPRM or NPP) in the *Federal Register*. At this time, interest groups and the citizenry have 30 to 60 days to submit comments on the proposed rule. When the public comment period concludes, agencies then review the comments to determine the language of the final rule to be published in the *Federal Register*.

**Conceptual Framework**

The intent of this inquiry was to examine the influence of interest groups on federal education policy; therefore, I chose Kingdon’s (2003) agenda setting model and Weick’s (1995) sensemaking model to frame the study. In the agenda setting model, three independent streams converge to open a window of opportunity for policy creation. The **policy stream** constitutes stakeholders both inside and outside the government. This stream attempts to identify the stakeholders most likely of getting a policy proposal on the federal agenda. The **problem stream** is the manner in which policy proposals come to the attention of government officials. The problem stream has three components – indicators, focusing events, and feedback – providing stakeholders both inside and outside of government to participate in the pre-proposal stage of federal rulemaking. Finally, according to Kingdon (2003), the **political stream** includes, “just about any activity related to the authoritative allocation of values, or to the distribution of benefits
and costs” (p. 145). There are three components within the political stream – national mood, organized political forces, and the government itself. A second lens from which to frame the study came from Weick’s (1995) notion of sensemaking. We are constantly engaged in making sense of our environment through the influence of seven interrelated properties that include: identity construction, retrospection, extracted cues, plausibility, the environment, social functions, and is ongoing. I believed Kingdon’s agenda setting model and Weick’s sensemaking model provided an important framework for understanding the federal rulemaking process and the influence of interest groups.

Research Questions

1. In what ways do different interest groups influence the rulemaking process in the development of federal education policy?

2. In what way does the rulemaking process support or reinforce democratic principles?

Design of Study

According to Marshall and Rossman (2010), qualitative research is a broad approach to the study of social phenomena. The authors go on to state that it is conducted by researchers who “are intrigued with the complexity of social interactions as expressed in daily life with the meanings the participants themselves attribute to these interactions” (p. 2). Postmodern qualitative perspectives that critique social science research assert that, “all research is interpretive and fundamentally political…and involves issues of power” (Marshall & Rossman, 2010, p. 20). The specific design structure incorporated select interest groups as case studies for the research. Glesne (2011) described this design as a “collective case study” in that several cases were examined in order to explore the complexities within each case and their linkages to the
social context of which they were a part (p. 22). Further, cases were analyzed for their influence on federal policy.

I chose qualitative research for this study because there was very little research on the impact of interest groups on federal education policy during the rulemaking process. My philosophy of knowledge was one of a constructivist approach, as I preferred to focus on meaning and understanding. According to Creswell (2008), a constructivist design approach examines the “views, values, beliefs, feelings, assumptions, and ideologies of individuals” (p. 439). This study built upon the work of two existing dissertations: one on the influence of interest groups on federal environmental policy (Rinfret, 2009) and the other on the influence of interest groups through education media stories (McDonald, 2008).

**Participant Selection**

Purposeful sampling of interest groups selected for this study was based upon the groups’ presence during the public comment stage of federal rulemaking for the 2009 *Race to The Top* (RTTT) education legislation. Creswell (2008) stated that researchers use purposeful sampling because participants “are information rich” (p. 214). One federal agency and 3 interest groups were utilized for this study. In addition to the United States Department of Education as the sponsor of RTTT federal legislation, I strived to analyze communication by interest groups during the RTTT rulemaking process, as noted by the *Federal Register*. This was particularly important, as this study attempted to determine the influence of interest groups during the informal stages of the federal rulemaking process. Utilizing purposeful sampling, interest groups were invited to participate, with the goal of no less than 3 and no more than 5 groups in the study. Finally, every attempt was made to include interest groups with differences in stated
ideology. The following filters were used to invite interest groups for participation in the study: 1) stated ideology, 2) accessibility within the timeframe necessary to complete the study, and 3) robust public documentation of the interest group’s work.

**Data Collection**

Marshall and Rossman (2010) noted four primary methods for collecting data: (1) participating in the setting, (2) observing directly, (3) interviewing in depth, and (4) analyzing documents and material culture. In addition, the authors noted secondary or specialized methods of data collection including, but not limited to: (1) gathering data using the internet, and (2) utilizing software for data analysis. This study incorporated a number of these data collection methods including: (1) interviews of interest group and contact designees, (2) analysis of U.S. Department of Education and interest group documents and materials, (3) internet data, and (4) discourse analysis of U.S. Department of Education and interest group information. Sources of data consisted of U.S. Department of Education information and policy, the *Federal Register*, and interest group publications, literature, policy statements, and website discourse. The Department of Education and interest group informational policy questionnaire was based upon the CARMA data analysis protocol.

**Definition of Terms**

*Polity* – The systems of political arrangements made up of institutions and procedures that define who will participate in education policy decisions and how (Kaestle, 2007).

*Interest Groups* – For the purpose of this study, I combined two academic definitions to conceptualize interest groups in the broadest sense. Truman’s (1951) definition of interest groups suggested that persons united on the basis of one or more shared attitudes and beliefs. These persons then came together to protect their own interests, make claims
upon other groups, and ultimately influenced policymaking. In addition, Stone and Denham (2004) identified the following think tank concepts which were incorporated into the definition:

Relatively autonomous organizations engaged in:

1) analyzing policy issues,
2) informing or influencing policy through intellectual argument,
3) generating ideas and concepts that guide policy,
4) collecting, synthesizing, and creating information products.

**Significance of the Study**

Education has often been a top tier policy agenda at the local, state, and Federal levels (Kaestle, 2007). As such, policymakers and education leaders must make informed decisions regarding education policy reform issues. A problem for policymakers, scholars and educational leaders was that it has been difficult to determine whether interest group education agendas reflect the intent of federal agencies or lawmakers as education policies take shape during the rulemaking process. Thus, it was important to determine whether interest groups influenced federal education policy during the informal stages of federal rulemaking.

**Summary**

According to Stone and Denham (2004), interest groups played a role “as agenda setters that created policy narratives that captured the political and public imagination” (p. 11). Furthermore, they had the “ability to set the terms of debate, define the problems and shape policy perception” (Stone & Denham, 2004, p. 11). Yet, there was little research regarding interest groups as they related to education policy reform during the rulemaking process. In fact, McGann (1995) suggested that future interest group studies
include both strategic group studies as well as individual firm studies. The chapters that follow include a review of the literature in chapter two, research methodology discussion in chapter three, findings of the study in chapter four, and the summary, conclusions, and recommendations in chapter five. The purpose of this study was to examine the influence of a small cluster of interest groups that participated in the informal stages of the federal rulemaking process.
CHAPTER TWO
LITERATURE REVIEW

As educational scholars and practitioners, we work and live with education policies and their intended and unintended effects each and every day. For this reason, political understanding and advocacy must be at the core of educational leadership. Carl Kaestle (2007) contended that educators need to know more about the policy process but more importantly, they need to invest more time and effort in “mobilizing political will” related to educational policy (p. 36). This literature review attempted to examine what was known about social construction of federal educational policy, and more specifically, the way in which particular interest groups attempted to influence the content of educational policies. The review of literature began with the conceptual framework, followed by a discussion of educational polity with examples of groups and organizations that represent this polity. Next, I examined the history and current literature on think tanks, focusing on the ways in which various think tanks are classified and the ways in which they exercise influence. Finally, I presented the theoretical perspectives that guided particular elements of this study, Kingdon’s (2003) agenda setting model and Weick’s (1995) notion of sensemaking.

Theoretical Perspectives

A postmodern paradigm offers theories that attempt to explain how societies work and how people develop and interact (Glesne, 2011). According to Anderson (2009), those interactions are political and operate within a field of power. In the author’s recent book, Advocacy Leadership, Anderson echoes Kaestle’s viewpoint, calling for leaders who “believe in the basic principles of high quality and equitable education for all children who are willing to take risks to make it happen” (p. 14). Anderson states “like
policy, it (leadership) involves the authoritative allocation of values and scarce resources” (p. 172). In fact, Anderson proposes three critical means by which education leaders must adapt to the changing context of leading America’s public schools: 1) become knowledgeable about the political and economic shifts that impact students, 2) become engaged in the political contexts that shape the schooling experiences of students – particularly in urban and rural schools, and 3) become prepared to blend educational leadership research and preparation with policy analysis. Anderson (2009) states that school leaders “must become attentive to and engaged in the political processes shaping the conditions under which students are educated in U.S. public schools” (p. xiii). Like Anderson, McDonnell (2009) calls for greater collaboration between education and policy researchers. To do so, McDonnell (2009) believes educational policy scholars should draw on or invest more in policy feedback. In policy feedback, the author notes that “policies enacted and implemented at one point in time shape subsequent political dynamics so that politics is both an input into the policy process and an output” (p. 417). Kaestle (2007) also concurs with Anderson, suggesting that “monitoring and understanding evolving changes in the education polity can help policymakers become more perceptive and skilled at gaining their objectives within the existing system” (p. 35). Like McDonnell, I believe this is important, as policy feedback can inform the design of future education policies by incorporating the institutional and/or systemic effects policies have on governance and on services delivered to students.

**Postmodern Paradigm**

The postmodern paradigm that framed this research was influenced by the work of scholars like Jerome Bruner and John Dewey. As Doll (1993) pointed out, Bruner’s concept of “social reciprocity,” or learning from others, was a means to grow and develop
the mind. Similarly, Vygotsky’s theory of learning posited social interaction as an essential ingredient to growth. Finally, Dewey’s concept of connecting experiences and critical reflection added to a postmodern paradigm that generated understanding through experiences and relationships. Donald Schon (1983) stated “It is through dialogue, conversation, and public inquiry that we begin to reflect on our own tacit understandings, thereby starting the process of 1) bringing these understandings to consciousness and 2) changing them at the same time” (pp. 296-297). I believed this paradigm was relevant and useful to frame the policymaking process and, in particular, the informal stages of the rulemaking process. It is through dialogue that policy language takes shape, enabling us to make meaning of process and outcomes.

**Democracy, Power, and Policy**

According to Diane Ravitch (2010):

> Our public education system is a fundamental element of our democratic society. Our public schools have been the pathway to opportunity and a better life for generations of Americans, giving them the tools to fashion their own life and to improve the commonwealth. To the extent that we strengthen them, we strengthen our democracy (p. 242).

Foucault (2000) argued that the art of government is just the art of exercising power. Moreover, Spring (2008) stated that a consideration of power relations was crucial for a democratic state that shared power with all of its citizenry. Inequalities in power occurred because of differences in wealth, social status, gender, race, etc. In a democratic society, Spring argued, these inequalities gave some people more power than others in influencing political decision-making. Power, according to Fowler (2004), was the ability of an actor to affect the behavior of another actor. The term actor included individuals
such as superintendents, governors, and union presidents, and groups such as school boards, state legislatures, and parent-teacher associations. It was noted by Spring that Giroux believed the primary task of education was to help students understand the social construction of knowledge in the framework of power. I believed it was important to acknowledge the interrelationship of democracy, power, and public education, as this relationship played a central role in understanding the manner in which schools were governed, who participated, how resources were allocated, and who benefited from those resources.

Educational Polity

Polity and Policy

Kaestle (2007) defined the polity as the systems of political arrangements made up of institutions and procedures that define who will participate in education policy decisions and how. Welner (2011) identified “corporate-endowed conservative think tanks” as being a very real part of the current education polity attempting to “defund, deregulate, de-unionize, and shift to the private sector while reallocating policy-making authority from democratic institutions to a wealthy oligarchy” (p. 39). Yet, the author went on to state that “self-identified progressives” have also climbed on board the bandwagon of market capitalism in school reform efforts. Welner (2011) listed organizations such as the Brookings Institution, the United Negro College Fund, National Council of La Raza, Democrats for Education Reform, Knowledge is Power Program (KIPP), Teach for America, New Leaders for New Schools and the Harlem Children’s Zone as examples of today’s polity. Table 2 shows how Kaestle (2007) categorized the types of organizations that make up the education polity (p. 32).
Table 2

*Types of Organizations in the Education Polity*

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Public School Constituents</td>
<td>American Federation of Teachers</td>
</tr>
<tr>
<td></td>
<td>National School Boards Association</td>
</tr>
<tr>
<td>2. Focused-Issue Groups</td>
<td>Home School Legal Defense Association</td>
</tr>
<tr>
<td></td>
<td>Council on Exceptional Children</td>
</tr>
<tr>
<td>3. Standards-Based Reform Groups</td>
<td>Achieve</td>
</tr>
<tr>
<td></td>
<td>National Board for Professional Teaching Standards</td>
</tr>
<tr>
<td>4. School-Based Reform Groups</td>
<td>Coalition for Essential Schools</td>
</tr>
<tr>
<td></td>
<td>New American Schools</td>
</tr>
<tr>
<td>5. Quasi-Governmental Groups</td>
<td>National Assessment Governing Board</td>
</tr>
<tr>
<td></td>
<td>National Goals Panel</td>
</tr>
<tr>
<td>6. Multi-Issue Groups</td>
<td>National Association for the Advancement of Colored People</td>
</tr>
<tr>
<td></td>
<td>National Governors Association</td>
</tr>
<tr>
<td>7. Foundations</td>
<td>Bill &amp; Melinda Gates Foundation</td>
</tr>
<tr>
<td></td>
<td>Fordham Foundation</td>
</tr>
<tr>
<td>8. Think Tanks</td>
<td>American Enterprise Institute</td>
</tr>
<tr>
<td></td>
<td>RAND Corporation</td>
</tr>
<tr>
<td>9. Intermediary Organizations</td>
<td>Institute for Justice</td>
</tr>
<tr>
<td></td>
<td>New Sponsors for New Schools</td>
</tr>
<tr>
<td>10. For-Profit Sector</td>
<td>Ginn Educational Publishers</td>
</tr>
<tr>
<td></td>
<td>The Edison Project</td>
</tr>
</tbody>
</table>

Source: Kaestle, 2007, p. 32

This organizational structure was helpful and illustrated the spectrum of interest groups in the education polity.

Polity was not limited to organizations; Welner (2011) also identified individuals who were generally quick to call for regulation in the business and corporate worlds now called for deregulation and free-market reforms in the public education sector.

Individuals included on the author’s list included President Barack Obama, Secretary of Education Arne Duncan, journalist Arianna Huffington, and television personality Oprah Winfrey among several others.
Welner (2011) suggested that “corporate-endowed conservative think tanks” were a critical part of the current educational polity. Rich (2004) stated that since the 1970’s, a disproportionate number of conservative corporate-influenced think tanks had emerged. The author pointed to four broad political developments prompting such growth: 1) political mobilization of businesses and corporations, 2) aggressive advocacy of neoconservative intellectuals, 3) the political mobilization of evangelical and fundamentalist Christians, and 4) the ascendance of neoclassical economic theory at universities and among policymakers (p. 49). Conservative think tanks emerged as a “friendlier ideological movement” than the New Deal liberalism of the time (Rich, 2004, p. 53). During the same period of history, Rich (2004) contended that three developments occurred that provided diminished opportunities for more progressive think tanks to emerge: 1) the Tax Reform Act of 1969 added stiff restrictions on the political activities of private foundations, which were generally think tank funders, 2) the largest think tank funder, the Ford Foundation, saw its resources begin to dwindle, and 3) the Department of Defense contract research support began to decrease, making the proliferation of more centrist and progressive think tanks wane. Welner (2011) concurred with Rich by noting that non-conservative think tanks had shifted their funding priorities from national political issues to community-based projects that addressed urgent needs. Given all of these considerations, I believed the critical question to ask was: How do think tanks seek to inform and influence policymakers regarding education reform issues?

Think Tanks

While there was a growing body of scholarly work regarding “interest groups” and federal education policy to date, little work had focused on the influence of interest
groups on federal education policy during the rulemaking process. Therefore, this review focused specifically on the literature related to think tanks. According to Stone (2004), scholarly work around think tanks falls into two bodies of research. The first body focuses on the organizational form of think tanks. Analyses examined why and how think tanks emerged and the organizational capacities that made them successful. The second body of research concentrated on policy process, ideas and expertise, and network approaches employed by think tanks. Using the definition of interest groups noted in chapter one of this dissertation, think tanks comprise a significant role in the spectrum of interest groups. A growing body of research existed on think tanks and, more specifically, on their influence in American government.

**History**

A number of scholarly works included a historical account of think tanks in the United States (Abelson, 1992; Abelson, 2006; McGann, 1995; McGann, 2007; McGann & Weaver, 2000; Medvetz, 2007; Mulcahy, 2009; Ricci, 1993; Rich, 1999; Smith, 1991; Stahl, 2008; Stone, 1996; Stone & Denham, 2004; Weiss, 1992). Several other studies included historical accounts of international think tank development (Abelson, 2002; Denham & Garnett, 1998; Li, 2002; McGann & Sabatini, 2011; Stone, 1996; Stone & Denham, 2004; Stone, McGann & Weaver, 2002). Briefly, the first generation of United States think tanks came about as a response to the Progressive Era reforms of the early 1900’s. The U.S. Government utilized the intellectuals and analysts in think tank organizations to examine social challenges and responsibilities. According to Weiss (1992), the Russell Sage Foundation was founded in 1907 to study social conditions as a means to improve them. The Carnegie Endowment for International Peace was established in 1910 primarily to support public policy research.
Following World War II, the Government contracted with a second generation of think tanks to provide technical expertise for both the Cold War national security concerns and the war on poverty (Smith, 1991). An example of this generation of think tanks may be found with the RAND Corporation, which provided research, scientific analysis, technical support and policy-advising for the Government (Weiss, 1992). A third generation of think tanks emerged in the 1970s and 1980s, more ideological and politically active than previous groups. In fact, Abelson (1992) noted that think tanks now resemble interest groups and political action committees by pressuring political leaders to pursue policies similar to their own. Rich (1999) concluded that think tanks seek to impact the short-term, immediate positions and actions of policy makers. Stahl (2008) argued that think tanks have become institutions of ideological and political power. Today, there are more than 1700 think tanks in the United States (McGann, 2007).

According to Tompkins (2007), a seminal study by Hollings (1993) chronicled the development of public policy research institutes in Non-profit Public Policy Research Organizations: A Sourcebook on Think Tanks in Government. Tompkins’ (2007) annotated bibliography is a follow-up to Hollings’ work, chronicling think tank literature written since 1993. A small group of scholars, including but not limited to, Donald Abelson, James McGann, Andrew Rich, and Diane Stone added to the small body of literature on think tanks since 1993. Tompkins termed these authors’ works the “second wave,” because over the past 13 years they had expanded upon previous literature that examined the history and operations of think tanks (p. 15). More recent research included think tank contributions to policy-making, as well as their influence. It
also attempted to measure policymaker perceptions of think tanks, their ideologies, and their relationship with the media.

**Typology/Classification of Think Tanks**

The first comprehensive analysis of think tanks was compiled by McGann (1995), and was based upon an extensive survey of think tanks, annual reports, publications, interviews, scholarly books, and published articles. Seven strategic think tank groups emerged in the study: academic diversified, academic specialized, contract and consulting, advocacy, policy, literary agent and publishing, and state-based think tanks. Table 3 shows each type and identifies various think tanks that fit with each category.

Table 3

*Think Tank Typology*

<table>
<thead>
<tr>
<th>Strategic Group</th>
<th>Institution</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Academic Diversified</td>
<td>Brookings Institution</td>
</tr>
<tr>
<td>2. Academic Specialized</td>
<td>National Bureau of Economic Research</td>
</tr>
<tr>
<td>3. Contract/Consulting Tank</td>
<td>Rand Corporation</td>
</tr>
<tr>
<td>4. Advocacy Tank</td>
<td>Institute for Policy Studies</td>
</tr>
<tr>
<td>5. Policy Enterprise</td>
<td>Heritage Foundation</td>
</tr>
<tr>
<td>6. Literary Agent/Publishing House</td>
<td>Manhattan Institute</td>
</tr>
<tr>
<td>7. State-Based Think Tank</td>
<td>Commonwealth Foundation</td>
</tr>
</tbody>
</table>

Source: McGann, 1995, p. 71

In 2005, McGann and Johnson expanded upon the think tank typology classification in the table illustrated below (p. 14). This typology was developed based
upon an examination of 13 international think tank variables including, but not limited to:
issues of political freedom, economic freedom, freedom of the press, and gross domestic
product. The authors argued that in the global context, most think tanks tended to fall into
the broad categories noted in Table 4 (McGann and Johnson, 2005).

Table 4

*Think Tank Typology II*

<table>
<thead>
<tr>
<th>Category</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autonomous and independent</td>
<td>Significant independence from any one interest group or donor and autonomous in its operation and funding from the government.</td>
</tr>
<tr>
<td>Quasi independent</td>
<td>Autonomous from government but controlled by an interest group, donor or contracting agency that provides a majority of the funding and has significant influence over operations of the think tank.</td>
</tr>
<tr>
<td>University affiliated</td>
<td>A policy research center at a university.</td>
</tr>
<tr>
<td>Political party affiliated</td>
<td>Formally affiliated with a political party.</td>
</tr>
<tr>
<td>Government affiliated</td>
<td>A part of the structure of government.</td>
</tr>
<tr>
<td>Quasi governmental</td>
<td>Funded exclusively by government grants and contracts but not a part of the formal structure of government.</td>
</tr>
</tbody>
</table>


In contrast, Medvetz (2007) believed think tanks could not be classified into
discrete types, but instead were better characterized as occupying an analytical space of
competition along multiple dimensions. One such dimension was the think tank’s
dependence upon more established institutions limiting their autonomy. Regardless, I
believed it was helpful to understand where within the current polity the organization
may fit to better understand whether it had a vested interest in influencing federal
education policy.
Influence of Think Tanks

Stone (1996) explored the historical growth and development of think tanks in the U.S. The author also examined whether or not think tanks successfully influenced public policy. In addition, Stone reviewed think tank impact on advocacy for privatization in the public sector. While the author noted that think tanks contributed to policymaking discourse, she also found that their efforts were mitigated due to the growth in the number of think tanks over the past thirty years. Bookmyer (1999) found that think tanks promote their objectivity in policy research as a strategy to influence the policymaking process. The author went on to state that this was done by manipulating policy research to support the think tank’s interests.

Stone and Denham, eds. (1998; 2004) examined how think tanks have evolved to become transnational organizations, in which their activities within the domestic political system included regional or global markets. In addition, the editors found the role of ideas generated by think tanks to be at the core of the current policymaking process. Rich (2004) concluded that think tank influence generally occurs early in the policymaking process. McGann (2007) further stated that this is particularly true in the problem definition and agenda-setting phases. The purpose of my study was to further explore these findings specific to education policy in particular.

Abelson (2006) examined think tank influence on U.S. foreign policy and, more specifically, how think tanks played a role in presidential campaigns. Abelson’s research on the influence of think tanks expanded upon Rich’s study, which examined the media and congressional testimony. He concluded that having both the right idea as well as access to officials at a high level can help a think tank’s ability to craft policy. Medvetz (2007) found that the political effect of think tanks may be found in their “anti-
intellectualism,” by reducing the influence of more independently produced scientific and scholarly knowledge. McDonald (2008) stated that the influence of think tanks and their elite policy planning networks have marginalized more progressive institutes, schools of education, and academic research. Finally, Abelson (2009) evaluated think tank influence or importance in the policy making process. The author concluded that relevance was a better concept than influence because influence was difficult to measure with certainty.

**Ideology and Think Tanks**

The number, size, and reach of conservative think tanks relative to moderate or progressive think tanks, reflected the impact of funding decisions of donors on the right and the left (Welner, 2011). According to Welner:

> Few progressive foundations fund ongoing institutions with strong strategic communications components and clear public policy goals. Because non-conservative foundations were much more likely to engage in community-based projects, it was not surprising that institutions funded by conservatives produced a much greater level of activity aimed directly at influencing policy (p. xviii).

A seminal study of think tank ideology conducted by Rich (2004) examined key words or phrases in mission statements and/or annual reports. For conservative think tanks, Rich looked for phrases such as the free market system, limited government, individual liberties, religious expression, and traditional family values. For liberal or progressive think tanks, the author looked for phrases such as economic, social or gender inequalities, poverty, social justice, sustainable environment, and lower defense spending. Finally, Rich determined that when think tank mission statements or published reports did not
readily place them in either the liberal or the conservative categories, these groups were determined to be centrist or no identifiable ideologies (Rich, 2004).

For purposes of this dissertation study, I used Rich’s ideological categories and discourse identifiers. The author noted, however, that think tanks do not always make their ideologies overtly known, as 501 (c) 3 tax exempt non-profit organizations are prohibited from devoting “more than an insubstantial part of [their] activities to attempting to influence legislation” or from “directly or indirectly participat[ing] in, or interven[ing] in (including the publishing or distributing of statements), any political campaign on behalf of or in opposition to any candidate in public office” (Rich, 2004, p. 18). Even so, the author found that of those think tanks that expressed an identifiable ideology in the study, the majority (65%) were found to be conservative while just one-third (35%) were considered to be liberal. Specific examples of think tank ideology may be found in the table below. McDonald’s (2008) follow-up study using Rich’s methodology found that of those think tanks with a focus on education policy, 62% were found to have conservative ideology, 26% had no identifiable ideology (or centrist), while just 12% could be described as liberal or progressive. According to Welner (2011), the significance of conservative think tanks was that networks of powerful allies were built in order to promote free-market proposals for solving problems of social inequalities in schools. With funding from conservative donors, these think tanks “engaged in aggressive outreach to media and policymakers to promote their favored ideas” (Welner, 2011, p. 43).
Table 5

*Think Tank Ideology*

<table>
<thead>
<tr>
<th>Think Tank</th>
<th>Ideology</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Enterprise Institute</td>
<td>Conservative</td>
</tr>
<tr>
<td>Heritage Foundation</td>
<td>Conservative</td>
</tr>
<tr>
<td>Hoover Institution</td>
<td>Conservative</td>
</tr>
<tr>
<td>Brookings Institute</td>
<td>Centrist</td>
</tr>
<tr>
<td>Progressive Policy Institute</td>
<td>Centrist</td>
</tr>
<tr>
<td>Urban Institute</td>
<td>Centrist</td>
</tr>
<tr>
<td>Institute for Policy Studies</td>
<td>Liberal</td>
</tr>
<tr>
<td>Joint Center for Political and Economic Studies</td>
<td>Liberal</td>
</tr>
<tr>
<td>Worldwatch Institute</td>
<td>Liberal</td>
</tr>
</tbody>
</table>


**Media and Think Tank Influence**

According to Haas (2004), there is ample evidence that the news media influenced public perceptions. The author examined think tanks and the use and presentation of information and research by news media. The author found that the media perceived all of the think tanks in the study as equally credible sources regardless of academic expertise. This finding had profound implications in that the perceived credibility of an organization could influence education policy more than the use of scientific research practices.
Rich (2001) found that perceived integrity of think tanks was found to be more important than factors such as ideological focus or marketing strategy in terms of media presence. In addition, large think tanks in the Washington, D.C. area tended to be preferred for media visibility. Rich (2005) determined that think tanks with larger budgets tended to have greater visibility in the media and on Capitol Hill. Abelson (2006) examined think tanks and their impact on the media. Abelson’s research expanded upon Rich’s study examining the media and congressional testimony. He concluded that having both the right idea as well as access to officials at a high level could help a think tank’s ability to craft policy.

Stahl (2008) found that think tanks had gained authority with the media by positioning themselves against the liberal views of university academics and government bureaucrats. Rich and Weaver (2000) found that think tanks with more conservative ideology tended to gain more media visibility, but this was mediated when controlled for budgets. The study concluded that think tank budgets, ideology, and geographical location tended to bias media visibility. Think tanks with significant funding sources tended to generate media visibility, which then attracted additional funding. Think tanks based in Washington, D.C. remained dominant players in the media due to personal networks and proximity to media sources. Moreover, think tanks with conservative ideology or no identifiable ideology tended to receive more media coverage than those with liberal or progressive ideology.

In 2009, Abelson examined media (television and newspaper) citations to determine how think tanks developed their public relations strategies. Abelson looked at five think tank case studies to evaluate their media visibility and their importance in the
policy making process. The author concluded that think tanks with the most media visibility were not necessarily the most credible institutes in the policy-making process. Abelson (2009) noted that while think tanks like the highly-media visible Cato Institute might be effective in shaping the national agenda, a lesser-media visible think tank such as RAND might play a more active role in the formal stages of policy formulation. Examining the marketing priorities among think tank organizations would provide further insight into the role of media and influence on policymaking.

**Ideology and Media**

Rich (2001) divided 66 think tanks into equal ideological clusters (conservative, liberal, and centrist) to determine whether ideology and marketing strategies played a factor in media visibility. The author also collected data on the number of times the think tank authored an article in a prominent U.S. newspaper in 1991, 1993, and 1995. Think tanks with conservative ideology tended to be published in newspapers more often than think tanks with liberal or centrist ideologies. Rich (2005) examined the premise that think tanks with larger budgets have greater visibility in the media and on Capitol Hill. The author concluded that think tanks with more conservative ideology tended to have more media visibility than those with liberal or centrist ideologies. The author went on to state that think tanks with more conservative ideology tended to utilize their resources more strategically to gain more visibility with policymakers and the media. Rich concluded that foundations with more conservative ideology tended to fund operating budgets of think tanks, giving them the freedom to shift their priorities to address the most important issues facing congress. This was viewed as an advantage over think tanks funded by more centrist or liberal ideology. Stahl (2008) stated that think tanks with conservative ideology have become institutions designed for theorizing and marketing
their policies to both lawmakers and the public at large. Finally, McDonald (2008) noted that think tanks with conservative ideology had successfully changed education discourse from an equity and access paradigm to one of accountability and standards.

**Educational Policy and Think Tanks**

McDonald (2008) argued that “while social scientific research produced at universities has been marginalized by conservative think tanks, the university itself has retreated from participating in applied research that is engaged in social, political, and economic reform” (p. 168). This appeared to be consistent with statements made by Kaestle (2007) and McDonnell (2009), encouraging educators and scholars to become more active in political advocacy. McDonald stated:

Conservatives have won the ‘war of ideas’ when it comes to shifting the parameters of education policy debates, not because they have more convincing or better research, but because they have built a coalition and social movement that has been able to dominate the debate (p. 168).

The author created the table in Appendix A to illustrate current education policy issues and the position of think tanks based upon their ideology. Policymakers and educators can determine which education policies may be supported or rejected based upon the ideology of the think tank organization.

An example of an interest group’s support of education policy may be found in The Education Trust’s support of the No Child Left Behind Act of 2001. According to the Education Trust, “used effectively, the No Child Left Behind Act (NCLB) can be an important tool for improving achievement and closing the achievement gap” (p. 2). Using Appendix A, The Education Trust’s support for policy that supports education equality may suggest that the organization has a more liberal or progressive ideology due
to their support for No Child Left Behind. In contrast, The Heritage Foundation also
supported the No Child Left Behind Act of 2001. Using Appendix A, The Heritage
Foundation’s support for policy that encourages federally mandated testing may suggest
the organization is neo-conservative in ideology. McDonald (2008) suggested The
Heritage Foundation’s support for the policy was a show of support for the Republican
party in general. Regardless of the motive, McDonald noted that The Heritage
Foundation later challenged its members to “reassess whether the federal role in
education is effective or warranted” (p. 152). Thus, while ideology may be useful in
understanding think tanks, it may be less useful in understanding support for or against
federal education policies. Education scholars within think tanks had their own interests,
ideologies, and agendas that may or may not align with a think tank’s overall ideology.
For this reason, it appeared that a think tank’s ability to influence education policy may
be complex, requiring a better understanding of the process.

Lenses for Understanding Think Tanks

Kingdon’s (2003) agenda setting model provided the first analytical lens to better
understand think tanks. In the agenda setting model, three independent streams converge
to open a window of opportunity for policy creation. The policy stream constitutes
stakeholders both inside and outside the government. According to Kingdon,
stakeholders included “a community of specialists: researchers, congressional staffers,
people in planning and evaluation offices and in budget offices, academics, interest group
analysts. Ideas float around in such communities” (p. 116). In an effort to more closely
define stakeholders, Kingdon’s policy stream included policy communities and policy
entrepreneurs. Policy communities were stakeholders both inside and outside of
government and included academics, consultants, and interest groups. Policy
entrepreneurs advocated for specific policy proposals, using their resources with the goal of getting a return on their investment. Policy entrepreneurs included cabinet secretaries, lobbyists, Senators or Congressmen, lawyers, etc. The policy stream attempted to identify the stakeholders most likely to get a policy proposal on the federal agenda. The problem stream was the manner in which policy proposals came to the attention of government officials. The problem stream had three components – indicators, focusing events, and feedback – which provided stakeholders both inside and outside of government the ability to participate in the pre-proposal stage of federal rulemaking. Indicators were facts and their interpretations or implications. A focusing event was a crisis or major event with significant visibility. An example of a focusing event would be the September 11, 2001 attacks on the United States. Such a crisis prompted multiple policy changes in America. Feedback occurred when government officials received comments from interest groups, academics or high-ranking officials regarding programs at the federal level.

Finally, according to Kingdon (2003), the political stream included “just about any activity related to the authoritative allocation of values, or to the distribution of benefits and costs” (p. 145). There were three components within the political stream – national mood, organized political forces, and the government itself. National mood was the notion that officials inside government could sense the mood of the nation’s citizens. Organized political forces paid attention to the national mood, as this effects election or re-election campaigns. The third component of Kingdon’s political stream was the government. The President and the Congress played critical roles in promoting policy. With each election cycle, new agenda items may have been introduced for policymaking. I believe Kingdon’s agenda setting model provided an important analytical lens in understanding the federal rulemaking process and the influence of interest groups.
A second lens from which to better understand think tanks comes from Weick’s (1995) notion of sensemaking. Sensemaking is defined as “the ways people generate what they interpret” (p. 13). We are constantly engaged in making sense of our environment through the influence of seven interrelated properties, including: identity construction, retrospection, extracted cues, plausibility, the environment, social functions, and is ongoing. *Identity construction* included who we are and what factors have shaped our lives to influence how we see the world. *Retrospection* referred to our reliance on past experiences to interpret current events through comparative practices. *Focus on and by extracted cues* included our ability to focus on certain cues or elements, while completely ignoring others, in order to support our interpretation of an event. *Driven by plausibility rather than accuracy* meant that we look for cues to make sensemaking more plausible, as opposed to relying on the accuracy of our perceptions in making sense of an event. *Enactment of the environment* meant that we make sense of an experience within our environment. *Social* meant that our sensemaking is based upon interactions with others. And finally, *ongoing* meant that sensemaking never stops; we are constantly making sense of what is happening around us.

In policymaking, sensemaking was a heuristic for understanding the processes that lead to educational policies within an organization like the federal government. According to Mills, Thurlow, and Mills (2010), this framework “takes a complex combination of variables including social psychological properties, discourse, organizational rules, and formative context in which organizations exist and offers an analysis of how these forces combine to allow individuals to make sense of their environments and take action on a day-to-day basis” (p. 190). I believe this offered an
insightful lens to understand the influence of interest groups during the early stages of the policymaking process.

**Summary**

As previously mentioned, there was little research conducted on the influence of interest groups specific to: 1) education policy and, 2) the informal stages of the rulemaking process. Two dissertation studies have, however, added to this body of knowledge and served as seminal works for this dissertation study. McDonald (2008) found that certain interest groups influenced education media stories despite these groups conducting little research in the area of education. As a result, the author concluded that academic researchers may be marginalized and social science research in general may not be relevant in today’s political context. Rinfret (2009) found that interest groups influenced federal environmental policy during the informal rulemaking process. This dissertation study examined the ways in which interest groups influence federal education policy during the informal rulemaking process. Advocacy leadership, as noted by Anderson (2009), makes understanding of the policymaking process a relevant and necessary part of leadership in today’s schools and school systems. Now that a review of the literature has been conducted, the following chapter will examine the study’s research methodology.
CHAPTER THREE

METHODOLOGY

Leadership is political and ideological at its very core (Anderson, 2009). Thus, it stands to reason that educational leaders, scholars and policy makers have an inherent interest in education policies and their role in current education reform efforts. Moreover, as democratic institutions, the manner in which schools are governed, who participates, how resources are allocated, and who benefits from those resources have long-term consequences because they shape the future of our citizenry. According to Kaestle (2007), education remains a top-tier political agenda item. Yet, who informs policy rulemaking at the federal level?

Interest groups are a critical part of the education polity. Some current public school reform initiatives brought forth by interest groups (generally representing a conservative ideological position) promote ideas such as privatization and/or entrepreneurial free-market practices in education (Welner, 2011). Yet, the choice initiatives espoused by these groups lack conclusive research evidence (Belfield & Levin, 2005). Some current public school reform initiatives brought forth by interest groups with more progressive or liberal ideologies promote equity and access for all children, citing the principles of democracy on which public education was founded (Welner, 2011). Yet, these initiatives are believed by some to support an education monopoly that limits choice and compromises quality (Kaestle, 2007). With such inconclusive research evidence for public school reform initiatives, it becomes necessary to better understand how federal education policies take shape. This is important because education policies determine who participates in the system, how resources are allocated, who benefits from those resources, and the long-term consequences on public education. Little research
explored such influence with regard to education policy, particularly during the rulemaking process. The intent of this qualitative study was to provide an understanding of the influence of interest groups during the informal federal rulemaking stages in education policy, and how the rulemaking process supports or reinforces democratic principles.

**Research Philosophy**

The research philosophy that guided this study followed a postmodern paradigm. According to Glesne (2011), postmodernists “tend to focus on deconstructing texts, showing how they systematically include and exclude people and ideas” (p. 13). The author goes on to note that postmodernists favor critique of theories that attempt to explain how societies work and how people develop and interact. This research paradigm fit my leadership perspective in that I am mindful of social justices (and injustices) in the practices, processes, and policies in education. Utilizing case study design in this research paradigm enabled me to conduct in-depth exploration of the bounded system of the federal rulemaking process. Creswell (2008) notes that in case study design, a bounded system may be an activity, event, process, or individual. The critical component in this case study design was informed by the work of Friere (1987), in which educational initiatives attempt to create progressive social change and more egalitarian social relations.

**Research Questions**

To guide the study, I developed the following research questions.

1. In what ways do different interest groups influence the rulemaking process in the development of federal education policy?
2. In what way does the rulemaking process support or reinforce democratic principles?

**Design of Study**

According to Marshall and Rossman (2010), qualitative research is a broad approach to the study of social phenomena. The authors go on to state that it is conducted by researchers who “are intrigued with the complexity of social interactions as expressed in daily life with the meanings the participants themselves attribute to these interactions” (p. 2). Postmodern qualitative perspectives that critique social science research assert that “all research is interpretive and fundamentally political…and involve issues of power” (Marshall and Rossman, 2010, p. 20). The specific design structure of the present study incorporated select interest groups as case studies for the research. Glesne (2011) describes this design as a “collective case study,” in that several cases are examined in order to explore the complexities within each case and their linkages to the social context of which they are a part (p. 22). Further, cases were analyzed for their influence on federal policy.

I chose qualitative research for this study because there was little research on the impact of interest groups on federal education policy during the rulemaking process. The study builds upon the work of two existing dissertations: the first examined the influence of interest groups on federal environmental policy (Rinfret, 2009) and the second focused on the influence of interest groups on education media stories (McDonald, 2008).

**Participant Selection**

Purposeful sampling of interest groups selected for this study was based upon the groups’ participation during the informal stages of federal rulemaking for the 2009 *Race to The Top* (RTT) education legislation. Creswell (2008) stated that researchers use
purposeful sampling by selecting participants intentionally because they “are information rich,” with the goal of better understanding the central phenomenon of the study (p. 214). One federal agency and three interest groups were utilized for this study. In addition to the United States Department of Education as the sponsor of RTT federal legislation, I strived to analyze communication by interest groups during the RTT rulemaking process as noted by the Federal Register. This is particularly important, as this study attempted to determine the influence of interest groups during the informal stages of the federal rulemaking process. Utilizing purposeful sampling, interest groups were invited to participate with the goal of no less than 3 and no more than 5 groups in the study. Finally, every attempt was made to include interest groups with differences in stated ideology. The following filters were used to invite interest groups for participation in the study: 1) stated ideology, 2) accessibility within the timeframe necessary to complete the study, and 3) robust public documentation of the interest group’s work.

**Data Collection**

**Interest Group Selection**

Marshall and Rossman (2010) note four primary methods for collecting data: (1) participating in the setting, (2) observing directly, (3) interviewing in depth, and (4) analyzing documents and material culture. In addition, the authors note secondary or specialized methods of data collection including, but not limited to: (1) gathering data using the internet, and (2) utilizing software for data analysis. This study incorporated a number of these data collection methods including: (1) questionnaire and interview data from interest group and U.S. Department of Education contact designees, (2) analysis of U.S. Department of Education and interest group documents and materials, (3) internet data, and (4) discourse analysis of U.S. Department of Education and interest group
information. Twenty-four organizations co-authored a letter that provided comments and recommendations in response to the RTTT notice published in the *Federal Register*. Requests were made from these organizations to participate in this study, as they actively participated in the public comment stage of the federal rulemaking process. From this group, three interest groups responded to requests to participate in this study. According to Marshall and Rossman (2011), this type of purposeful sampling “focuses, reduces, and simplifies” the study sample (p. 111).

The questionnaire found in Appendix B was provided to a staff member from each participating organization. Staff members from two participating organizations were identified through personal or professional relationships. Both of these individuals requested to complete the questionnaire via semi-structured telephone interview using open-ended questions. Creswell (2008) states that open-ended questions best enable participants to “voice their experiences unconstrained by any perspectives of the researcher or past research findings” (p. 225). Every attempt was made to interview the senior policy researcher or his/her designee at each of the interest groups.

According to Marshall and Rossman (2011), there are advantages in qualitative research of interviewing elites, or “individuals in positions of power and influence” (p. 155). Valuable information can be gained such as legal and financial information, historical perspectives, and organizational policies. Due to shortened time constraints to complete this study, my participation in the setting and direct observation were not possible. Fortunately, the federal government publicized legislation and documents, including record of public comment via the *Federal Register*, on the internet. In addition, each of the interest groups provided detailed information about their organization on their
respective websites. For this reason, I believed data collection using online methods provided sufficient information to adequately address the research questions.

Following the interview, written transcripts were provided to the individuals to insure the accuracy of transcription. The third participating organization identified the appropriate staff member to engage in the study. This individual completed the questionnaire in writing and emailed the responses back to me. No follow-up member checking was necessary, as responses were provided by the individual directly and were very clear and concise.

**Data Collection and Analysis**

As noted in Table 6 below, numerous data sources were collected and analyzed for this study. The primary source of data collected from the federal government was found in the *Federal Register*. Policy language in the RTTT notice of proposed priorities, requirements, definitions, and selection criteria (NPP) was analyzed and compared to language found in the final RTTT notice as published in the *Federal Register*. This also enabled me to examine the spectrum of public comment made following NPP, which was published in the RTTT final notice.

Table 6

*Data Collection Sources*

<table>
<thead>
<tr>
<th>Data Source</th>
<th>Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Department of Education publications, literature, policy documents, website discourse</td>
<td>Discourse analysis</td>
</tr>
<tr>
<td><em>Federal Register</em></td>
<td></td>
</tr>
<tr>
<td>Interest group publications, literature, policy statements, website discourse</td>
<td>Discourse analysis</td>
</tr>
<tr>
<td>Interest group contact person(s)</td>
<td>Questionnaire and/or Interview</td>
</tr>
</tbody>
</table>
In addition, the federal government enables the citizenry to access public comments made on any legislative notice. Public comments made following the RTTT notice were invaluable in comparing the language of interest group recommendations with that of the final RTTT language. Table 7 below illustrates the use of the Complementary Analysis Research Matrix Application (CARMA) in comparing the language found in interest group public comments with final RTTT language. CARMA is a critical evaluation framework developed by Putney, Wink, and Perkins (2006), and was originally designed to be used for program evaluation and as a reflexive classroom inquiry tool. CARMA is grounded in the work of Friere (1987), in which educational initiatives attempted to create progressive social change and more egalitarian social relations, and Vygotsky (1986), in which human development occurred in a systems context.

This study incorporated CARMA as a critical discourse analysis protocol. I believed it was important to analyze language from the commenters’ perspective since the purpose of this study was to examine the influence of interest groups on federal education policy during the informal stages of rulemaking. If final RTTT language was found to be convergent with interest group public comment, it may suggest influence during the informal stages of the rulemaking process. If final RTTT language was found to be divergent with interest group public comment, it may suggest little or no influence.

Table 7

*RTTT Public Comment Analysis using CARMA*

<table>
<thead>
<tr>
<th>Expected</th>
<th>Evident</th>
<th>Results</th>
<th>Conclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest Group Public Comment Language</td>
<td>RTTT Final Policy Language</td>
<td>Convergent vs Divergent</td>
<td>Influence vs No influence</td>
</tr>
</tbody>
</table>
Interest group data collection and analysis included publications, literature, policy statements, and website discourse. This information provided important background and/or historical context for each organization. It also provided relevant information on ideology and policy positions. Discourse analysis began by coding the data. According to Creswell (2008), coding assists the researcher in making sense of text data, dividing it into segments, labeling the segments, examining for overlap, and collapsing into themes. Moreover, Glesne (2011) states that coding is the starting point from which to “look for patterns, make comparisons, produce explanations and build models” (p. 196). Interview data was transcribed manually into a Microsoft Word document for analysis.

Table 8 below illustrates Rich’s (2004) ideological framework that was used to gain a broad understanding of each interest group’s ideological perspective.

Table 8

<table>
<thead>
<tr>
<th><strong>Interest Group Ideology Framework</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Conservative</strong></td>
</tr>
<tr>
<td><strong>Centrist or No Identifiable Ideology</strong></td>
</tr>
<tr>
<td><strong>Liberal</strong></td>
</tr>
</tbody>
</table>

This is an important consideration, as 501 (c) 3 tax exempt non-profit organizations are prohibited from devoting “more than an insubstantial part of [their] activities to attempting to influence legislation” or from “directly or indirectly participat[ing] in, or interven[ing] in (including the publishing or distributing of statements), any political campaign on behalf of or in opposition to any candidate in public office” (Rich, 2004, p. 18).

Interview or questionnaire responses from each interest group provided qualitative data used to better understand organizational viewpoints on RTTT legislation and on the processes each organization utilized to participate in policy development. Equally important, the questionnaire protocol attempted to gain understanding of the federal policy process from the perspective of each interest group. The federal rulemaking process is relatively straightforward, guided by the Administrative Procedures Act of 1946. However, little has been known about the policy engagement process of interest groups or about how interest groups view the federal policy making process. Language in responses to questions one through three on the questionnaire were analyzed using the CARMA discourse model. Table 9 below depicts how the CARMA model was used to analyze each interest group’s questionnaire responses. Responses to items four through seven on the questionnaire were reviewed using discourse analysis only.
As negotiated during the I.R.B. process for the University of Nevada, Las Vegas, the identity of each interest group was protected. The identity of the individual respondent from each of the interest groups was also protected. Thus, interest groups were referred to as Interest Group A, B, and C, and the respondents were referred to as Respondent A, B, and C, respectively.

**Analytical Framework**

The intent of this inquiry was to examine the influence of interest groups on federal education policy; therefore, Kingdon’s (2003) agenda setting model provided the first lens from which to frame the study. In the agenda setting model, three independent streams converge to open a window of opportunity for policy creation. The policy stream constitutes stakeholders both inside and outside the government. This stream attempts to identify the stakeholders most likely to get a policy proposal on the federal agenda. The problem stream is the manner in which policy proposals come to the attention of government officials. The problem stream has three components – indicators, focusing events, and feedback – providing stakeholders both inside and outside of government the opportunity to participate in the pre-proposal stage of federal rulemaking. Finally, according to Kingdon (2003), the political stream includes “just about any activity related to the authoritative allocation of values, or to the distribution of
benefits and costs” (p. 145). There are three components within the political stream – national mood, organized political forces, and the government itself. I believe Kingdon’s agenda setting model provided an important framework for understanding the federal rulemaking process and the influence of interest groups.

A second lens from which to frame the study came from Weick’s (1995) notion of sensemaking. Sensemaking is about “the ways people generate what they interpret” (p. 13). We are constantly engaged in making sense of our environment through the influence of seven interrelated properties that include: identity construction, retrospection, extracted cues, plausibility, the environment, social functions, and is ongoing. **Identity construction** includes who we are and what factors have shaped our lives to influence how we see the world. **Retrospection** refers to our reliance on past experiences to interpret current events through comparative practices. **Focus on and by extracted cues** includes our ability to focus on certain cues or elements, while completely ignoring others, in order to support our interpretation of an event. **Driven by plausibility rather than accuracy** means that we look for cues to make sensemaking more plausible, as opposed to relying on the accuracy of our perceptions in making sense of an event. **Enactment of the environment** means that we make sense of an experience within our environment. **Social** means that our sensemaking is based upon interactions with others. And finally, **ongoing** means that sensemaking never stops; we are constantly making sense of what is happening around us. In policymaking, sensemaking is a heuristic for understanding the processes that lead to educational policies within an organization like the federal government. I believe this offered an insightful lens to understand the influence of interest groups on the early stages of the policymaking process.
Trustworthiness

Trustworthiness or goodness in qualitative research is determined by the principles of credibility, dependability, confirmability, and transferability (Marshall & Rossman, 2011). Credibility is defined by Lincoln and Guba (1985) as an evaluation of whether or not the research findings represent a credible conceptual interpretation of the data drawn from the participants’ original data. Credibility was addressed in this study through the use of triangulation and member checking during the interview and questionnaire process. According to Creswell (2008), triangulation is “the process of corroborating evidence from different individuals, types of data, or methods of data collection in descriptions” in order to support a theme (p. 266). Creswell (2008) goes on to note that member checking is, “a process in which the researcher asks one or more participants in the study to check the accuracy of the account” (p. 267).

Transferability is the degree to which the findings of this inquiry can apply or transfer beyond the bounds of the project. It is for this reason that convenience sampling of interest groups and interest group contact persons was utilized. Dependability is an assessment of the quality of the integrated processes of data collection, data analysis, and theory generation. This trustworthiness element was addressed by observing any changes in data. In addition, documenting, organizing, and theorizing about the data for external reliability purposes was incorporated in the study. Finally, confirmability is a measure of how well the inquiry’s findings are supported by the data collected (Lincoln & Guba, 1985).

Triangulation of data obtained from interviews, questionnaire responses, reflective journals, field notes, and transcription was used to address the confirmability element. To help insure the rigor and usefulness of a qualitative study, Marshall and
Rossman (2011) also suggest the use of a reflexive journal and a search for discrepant evidence or alternative explanations. A reflexive journal is a type of diary in which a researcher makes regular entries during the research process, recording methodological decisions, logistics, and reflection about what is happening (Lincoln & Guba, 1985). Rigor and usefulness in a qualitative study may be increased by a purposeful search for discrepant evidence or alternative explanations that may disconfirm the study.

**Limitations**

According to Marshall and Rossman (2011), discussion about a study’s limitations identify “what the study is and is not – its boundaries – and how its results can and cannot contribute to understanding” (p. 76). One limitation to this study is that it examined one federal agency, the U.S. Department of Education. In addition, three interest groups were studied as opposed to multiple groups. A third limitation is that one designee from each interest group was interviewed and completed the informational questionnaire, in contrast to groups or entire departments/units participating in the study. Finally, the interview data was dependent upon retroactive sensemaking (Weick, 1995). The author states that sensemaking includes the “ways people generate what they interpret” (p. 13). With this, the study focused on policy and influence for legislation already enacted. Again, the purpose of this study was to provide an understanding of the influence of interest groups during the informal stages of federal rulemaking in education policy. For this reason, it is important to inform the reader of the limitations inherent in the research design.

**Delimitations**

Delimitations refer to the boundaries of the study—its limits based on the context in which the research is carried out and the subjects involved. The first delimitation of
this study is that only a small convenience sampling of education interest groups was analyzed rather than all of them. In addition, only the U.S. Department of Education was studied as opposed to other governmental agencies. A third delimitation is that only public school reform-related legislation was considered for this research. Another consideration is that I only studied the influence of interest groups on the informal stages of rulemaking rather than later stages. Additionally, only those interest groups who participated in the Race to The Top rulemaking process were examined. Finally, it was preferred that the interest groups studied possessed differing ideologies. However, this was not necessarily possible given the time constraints of this study.

**Summary**

According to Stone and Denham (2004), interest groups play a role “as agenda setters that create policy narratives that capture the political and public imagination” (p. 11). Furthermore, they have the “ability to set the terms of debate, define the problems and shape policy perception” (Stone & Denham, 2004, p. 11). Yet, after review of the literature, there was little research regarding the influence of interest groups and education policy reform during the rulemaking process. With this, the intent of this research was to study interest groups that had a policy record and/or agenda on public school reform and that participated in the informal process of federal rulemaking. Following the methodology portion of this chapter, the next chapter will present the findings of the study.
CHAPTER FOUR
FINDINGS OF THE STUDY

As discussed in chapter three, the design was a collective case study that utilized convenience sampling to locate participants who responded to a questionnaire either in writing or by phone interview. Using the Complementary Analysis Research Matrix Application (CARMA) and discourse analysis, this chapter presents the findings for each case as well as a cross-case analysis. Data was collected from interest groups and U.S. Department of Education publications, literature, website discourse, policy statements, an informational questionnaire, and interview discourse, when available. In addition to the findings of the study, historical context and background information on each interest group is presented as well as an overview of each group’s published ideology. Importantly, information on the U.S. Department of Education’s 2009 Race to The Top competitive grant competition is discussed, as it is the centerpiece of the Obama Administration’s school reform efforts. Public comment for this legislation was co-authored by each of the interest groups analyzed in this study during the informal stage of the federal rulemaking process. A portion of the data analysis attempted to examine whether interest group public comment influenced the final language of Race to The Top federal education policy.

In order to best frame the context of the study, I believed it was important to include background discussion on President Barack Obama’s Race to The Top (RTTT) federal education reform policy. It is with regard to this specific policy that education interest groups engaged in public comment during the federal rulemaking process. RTTT was funded on February 17, 2009, as part of the Obama Administration’s American
Recovery and Reinvestment Act of 2009 (ARRA). ARRA was intended to stimulate the economy, support job creation, and invest in critical sectors, including education (U.S. Department of Education, 2009). This stimulus act allocated a record $4.35 billion toward the Race to The Top Fund. In addition to its unprecedented investment in education, this fund was unique in that it was a competitive “state incentive” grant. Prior to RTTT, most federal education funds were distributed through categorical grant programs in which monies were automatically allocated to states and districts using need-based formulas, regardless of school performance (Beam & Conlan, 2002). RTTT education policy intended to reward states that demonstrated success in raising student achievement, accelerated their reforms for the future, and modeled for others the best reform ideas across the country. At the core of RTTT were four education reform areas: 1) Adopting standards and assessments that prepare students to succeed in college and the workplace and to compete in the global economy; 2) Building data systems that measure student growth and success, and inform teachers and principals about how they can improve instruction; 3) Recruiting, developing, rewarding, and retaining effective teachers and principals, especially where they are needed most; and 4) Turning around the lowest-achieving schools (U.S. Department of Education, 2009).

Race to The Top grants were released in two phases. Following published notice in the Federal Register in November 2009, the first phase of applications was due in January 2010, just two months following the initial notice. In spite of the very quick turnaround time, forty states plus the District of Columbia applied for the incentive grants. In April 2010, it was announced that Delaware had been awarded $100 million and Tennessee had been awarded $500 million. States not awarded grants during the first phase could reapply in the second phase as could those states applying for the very first
time. Applications for phase two were due in June 2010, just 2 months following the awards announcement for phase one. Thirty-five states and the District of Columbia applied for phase two grants. In September 2010, the Department announced that 10 states received grant funding for phase two of RTTT. The awardees included: Florida, Georgia, Hawaii, Maryland, Massachusetts, New York, North Carolina, Ohio, Rhode Island, Washington, and the District of Columbia (McGuinn, 2011).

States were selected for RTTT based upon applications that reflected six priority areas. According to the Department of Education, Priority one, the only absolute priority, required states’ applications to address a “Comprehensive Approach to Education Reform” (p. 4). All four education reform areas noted in ARRA as well as State Success Factors Criteria must have been included in the application in order to demonstrate a systemic approach to education reform. The absolute priority had to be met throughout the entire application. It was this priority for which all points were assigned to grant applications. Priority two, a competitive preference priority, required states’ applications to demonstrate an “Emphasis on Science, Technology, Engineering, and Mathematics” (p. 4). The competitive preference priority had to be met throughout the entire application, but only 15 total points were awarded on an all or nothing basis. Priority three, an invitational priority, required states’ applications to include “Innovations for Improving Early Learning Outcomes” (p. 4). Applicants were encouraged to address invitational priorities, but no points were assigned to applicant states. Priority four was also an invitational priority and called for states’ applications to reflect “Expansion and Adaptation of Statewide Longitudinal Data Systems” (p.4). Priority five, an invitational priority, required states’ applications to reflect “P-20 Coordination, Vertical and Horizontal Alignment” (P. 5). Finally, priority six, an invitational priority, called for
states’ applications to create “School-level Conditions for Reform, Innovation, and Learning” (p. 5). Points were assigned to applications based upon the selection criteria noted in table 10 below.

Table 10

*RTTT Overview of Programs and Points (Absolute Priority 1)*

<table>
<thead>
<tr>
<th>Selection Criteria</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Success Factors</td>
<td>125 points</td>
</tr>
<tr>
<td>Standards and Assessments</td>
<td>70 points</td>
</tr>
<tr>
<td>Data Systems to Support Instruction</td>
<td>47 points</td>
</tr>
<tr>
<td>Great Teachers and Leaders</td>
<td>138 points</td>
</tr>
<tr>
<td>Turning around the Lowest-Achieving Schools</td>
<td>50 points</td>
</tr>
<tr>
<td>General Selection Criteria</td>
<td>55 points</td>
</tr>
<tr>
<td>Total Points</td>
<td>500 points</td>
</tr>
</tbody>
</table>


**Federal Rulemaking and Race to The Top**

The U.S. Department of Education published its notice of proposed priorities, requirements, definitions, and selection criteria (NPP) in the *Federal Register* on July 29, 2009. Following the NPP, 1,161 the public submitted thousands of unique comments, ranging from one paragraph to 67 pages (U.S. Department of Education, 2009). The Department noted that commenters included parents, professional associations, public officials, teachers, principals, governors, and chief State school officers. Individuals from all 50 States and the District of Columbia, including more than 550 individuals and 200 organizations, commented on the NPP. As a result, the Department stated that there
were “a number of differences between the NPP and the notice of final priorities, requirements, definitions, and selection criteria” (p. 59688). This will be discussed at greater length at the conclusion of this chapter.

**Interest Group Public Comment**

As discussed in chapter three, the purposeful sample of interest groups was based upon the group’s participation during the informal stages of federal rulemaking for *Race to The Top* education legislation. Following the notice of proposed priorities, requirements, definitions, and selection criteria on July 29, 2009, 24 organizations co-authored a letter that provided comments and recommendations in response to the notice published in the *Federal Register*. This letter made 15 recommendations to the U.S. Department of Education that supported states’ efforts to implement statewide longitudinal data systems consistent with principles advocated by the Data Quality Campaign (DQC). These recommendations referenced RTTT priorities four and five, Expansion and Adaptation of Statewide Longitudinal Data Systems and P-20 Coordination, Vertical and Horizontal Alignment, respectively. Appendix C summarizes, in no particular order, the recommendations made during the public comment stage of the federal rulemaking process.

Analysis of the interest group recommendations using the Complementary Analysis Research Matrix Application (CARMA) will be presented at the conclusion of this chapter. A comparison of the final language in RTTT federal policy will be made with the interest group recommendation language noted above. Convergent language may suggest that interest groups influenced federal policy, while divergent language may suggest that the interest groups did not influence federal policy during the informal stage of federal rulemaking. The remainder of this chapter will discuss the results for each of
the interest groups based upon the responses to the items on the questionnaire. Cross-case analysis will also be discussed following the individual interest group analysis. The chapter will conclude with theoretical applications and analysis of interest group public comment language compared with final RTTT policy language as published in the *Federal Register.*

**Interest Group A**

**Background**

Interest Group A (IGA) was founded in 1996, dedicated to supporting standards-based education reform efforts across the states. IGA is the only education reform organization led by a Board of Directors made up of governors and business leaders. The organization engages in four core areas of work: 1) Convening states and leaders, 2) Providing technical assistance to states, 3) Conducting research and development, and 4) Offering advocacy, communications, and outreach tools and support.

Because of the composition of their Board of Directors, IGA is in a unique position to convene leaders across states to address common education challenges. These leaders comprise a cross-section of K-12 educators, higher education officials, policymakers, legislators, governors, state boards of education, school districts, and business and community-based organizations. Evidence of their ability to convene leaders is found in their work as project managers for the American Diploma Project Network, the Partnership for Assessment of Readiness for College and Careers consortium (PARCC), and the Next Generation Science Standards development group.
In addition to their convening capacity for leaders, IGA provides technical assistance to states on the design, development, adoption, implementation, and communications of their college- and career-ready standards, assessments, curriculum, and accountability systems. IGA also conducts research and development efforts to advance the work of states and the education reform community. Key areas of research include implementation strategies for the Common Core State Standards Initiative (CCSSI), state accountability models, high school graduation requirements, and analyses of global education expectations. Finally, IGA develops advocacy resources to address college- and career-readiness concerns, including a comprehensive web-based resource center for education advocates. As a result of their efforts, Education Week (2006) ranked IGA as one of the most influential education policy organizations in the nation.

**Ideology**

According to its mission statement, IGA is a bipartisan, non-profit organization that helps states raise academic standards, improve assessments, and strengthen accountability to prepare all young people for postsecondary education, work, and citizenship. Using Rich’s (2004) ideological framework, bipartisan (or centrist) language was found consistently in their publications, literature, policy statements, and website discourse. IGA regularly called for advocacy leadership to come from cross-sector, bipartisan, and third-party or external coalitions.

**Respondent A**

Respondent A (RA) from Interest Group A holds a Ph.D. and is in a Director-level position within the organization. In the interest of time, the respondent preferred to
answer the items on the questionnaire via telephone interview, which took place on October 25, 2012. I took notes for each of the item responses and transcribed them immediately to better preserve accuracy. I then sent the interview transcript to the respondent for review. Following review by RA, no changes were requested or made of the transcript.

Item number one on the questionnaire asked RA about the primary intents of RTTTT before it was enacted. RA responded by saying: “RTTTT was a strategic initiative to support implementation of the Common Core State Standards Initiative (CCSSI).” Item number two asked RA about how RTTTT is working today, and the response was: “Because of the CCSSI, we now have common conversations around each priority area of RTTT. As RTTT plays out, it is really an advantage to have common conversations.” Item three asked the respondent if there could be a ‘do over’ on RTTTT, how might it change, and the response was: “I can’t think of anything. It is favorable to have statewide conversations with constituencies engaged in education.” Table 11 illustrates responses to questions one through three using the CARMA protocol.

Table 11

<table>
<thead>
<tr>
<th>Case</th>
<th>Question 1 Expected</th>
<th>Question 2 Evident</th>
<th>Question 3 Do over</th>
<th>Convergent/Divergent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest Group A</td>
<td>Initiative to Support Implementation of CCSSI</td>
<td>RTT Priority Areas Supported by Common Conversations (CCSSI)</td>
<td>No Changes. Common Conversations Favorable</td>
<td>Convergent</td>
</tr>
</tbody>
</table>
In terms of discourse, there was convergence between the respondent’s expectations of RTTT legislation before it was enacted with what is now evident in the policy now that it has been in place for nearly 2 years. This was further confirmed by the answer to question three in that no changes to the policy would have been recommended. Finally, discourse consistency was found between the respondent’s answers to items 1-3 and the mission and initiatives of the organization.

When asked about how the federal rulemaking process informs policy language, RA replied: “Rulemaking comes after dialogue of key constituencies. Good public policy like RTTT is developed as major education organizations discuss what is important and what should be part of the language.” Table 12 illustrates the federal policy process from the perspective of Interest Group A.

Table 12

*Interest Group A - Federal Policy Process*

<table>
<thead>
<tr>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dialogue</td>
<td>Policy Language</td>
<td>Federal Rulemaking</td>
</tr>
</tbody>
</table>

In response to whether ideological labels of interest groups reflect an accurate portrayal of the organization, RA stated:

We are Bipartisan. Our Board is made of Governors and key industry leaders on both sides. Labels like Bipartisan really matter because we are a 501 (c) 3 non-profit organization that is limited in engaging in political advocacy. This is not taken lightly as we can lose our non-profit status.
When asked about the organization’s decision-making process in policy issues, RA replied:

Organizations like ours and others have strategic plans or organizational parameters. Take the American Diploma Project (ADP) – there are clear policy initiatives. We are grounded in four pillars. The Board is very conscientious to fund only those initiatives that support these pillars. We have turned down proposals by funders or direct them elsewhere when they do not support our pillars.

Finally, I asked if there was any other information about the organization that would shed light on how educational policy takes shape. RA stated: “I would direct you to our website. We are driven by state needs and requests as they apply to our four pillars.”

Responses to questionnaire items four through seven were consistent with their publications, literature, policy statements, and website discourse.

**Interest Group B**

**Background**

Interest Group B (IGB) was founded in 1959, with a mission to help young people achieve educational and workplace success. Since its inception, the organization was incorporated as a non-profit organization and is tax exempt under Section 501 (c) 3 of the Internal Revenue Code. IGB company values include: excellence, diversity, leadership, empowerment, learning, and sustainability. Their Board of Directors includes a former U.S. Senator, a former U.S. Secretary of Education, corporate vice presidents, lawyers, university scholars, and others representing diverse backgrounds. Their governance
structure includes senior management as well as an advisory body consisting of state representative councils from all 50 states and the District of Columbia. State councils consist of individuals from K-12 districts and higher education institutions and state education agencies.

In line with their mission statement, IGB is responsible for a well-known college admissions and placement test. In addition, the organization provides more than one hundred other assessment, research, information, and program management services for education and workforce development. They serve individuals in elementary and secondary schools, colleges, professional associations, businesses, and government agencies, both nationally and internationally. Presently, IGB is developing a next generation assessment system designed to provide actionable information to measure and improve student performance beginning in very early grades. The organization serves educators, students, employers, job seekers, policymakers, and researchers. In this manner, IGB assists education and policy administrators in making informed decisions to better help students. They assist employers to make better hiring decisions in order to retain and develop a skilled workforce. They help job seekers gain necessary credentials and assist them in determining pathways to successful careers. In terms of research and policy, IGB has a team of researchers, psychometricians, and data analysts with extensive resources in the areas of curriculum, enrollment and retention, skills development, and education policy.

Ideology

Following review of the organization’s publications, literature, policy statements, and website discourse, IGB did not have an identifiable ideology according to Rich’s
(2004) framework. Their strategic vision is to provide integrated and innovative solutions supporting the lifelong advancement of achievements, behaviors, and goals from kindergarten through career, using research-based analytics and an unparalleled collection of meaningful and predictive data. In terms of leadership, IGB hopes to shape and influence the environments in which the organization operates through policy, research advocacy, and strategic engagement. The organization’s vision and policy language were found to be consistent across their publications, reports, and website discourse.

**Respondent B**

Respondent B (RB) from Interest Group B works in the organization’s headquarters, holds a Ph.D. in education administration, and is in a Coordinator-level position. Again, in the interest of time, the respondent preferred to answer the items on the questionnaire via telephone interview, which took place on October 31, 2012. I took notes for each of the item responses and transcribed them immediately to better preserve accuracy. I then sent the interview transcript to the respondent for review. Following review by RB, no changes were requested or made of the transcript.

When asked about the primary intents of RTTT before it was enacted, RB replied:

We were extremely interested in the initial legislation. As you know, there was an entire section of the proposed legislation on standards and assessments. Some of the proposal’s components applied to our organization’s assessments and solutions. The other piece of the legislation we were interested in aligned with the Common Core State Standards Initiative (CCSSI). In terms of background, the
organization was at the discussion table for common core. Our College Readiness Benchmarks informed a significant portion of the common core discussions from the beginning.

When RB was asked about how RTTT is working today, the response was: “It is apparent that the pace at which the plans are being implemented are different. Some are moving quickly, some slowly, and some are experiencing roadblocks. From this perspective, implementation is difficult to monitor.” I then asked the respondent if there could be a ‘do over’ with RTTT, how might it change, and the response was:

I don’t think we would have done anything differently. We have let the states know we are ready to respond to help them fulfill their plans. Our Regional office staff try to monitor implementation. The assessment industry in general is supposed to reflect and measure what is happening in education. We are not here to direct what is happening or to impose upon states.

Table 13 illustrates responses to questions one through three using the CARMA protocol.

Table 13

**Interest Group B Questionnaire Items 1 – 3 using CARMA**

<table>
<thead>
<tr>
<th>Case</th>
<th>Question 1 Expected</th>
<th>Question 2 Evident</th>
<th>Question 3 Do over</th>
<th>Convergent/ Divergent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest Group B</td>
<td>Implementation of standards (CCSSI) and common assessments</td>
<td>Implementation inconsistent but ongoing</td>
<td>Nothing different</td>
<td>Convergent (Limited)</td>
</tr>
</tbody>
</table>
There was limited discourse convergence between the respondent’s expectations of RTTT legislation before it was enacted with what is now evident in the policy. While the policy is still working through ongoing implementation, RB acknowledged that it is inconsistent from state to state. Yet, the organization would not have done anything different in a ‘do over’ situation, which would support discourse convergence. The responses were also very consistent with language in the organization’s mission statement.

Item number four inquired about how the federal rulemaking process informs policy language, to which RB replied: “We now have an office in Washington, D.C. for strategic initiatives to monitor the rulemaking process, so we are becoming more active.” The following reply to question number seven also shed light on how the organization views policymaking at the federal level, as RB stated:

We are now at the table in Washington, D.C. Our visibility has risen dramatically. We are at the table because of the work we’ve done to inform policy. We are respected because we have information and data to inform policy.

Table 14 illustrates the federal policy process from the perspective of Interest Group B.

Table 14

<table>
<thead>
<tr>
<th>Interest Group B - Federal Policy Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 1</td>
</tr>
<tr>
<td>Dialogue/Data to Inform Policy</td>
</tr>
</tbody>
</table>
When asked about whether ideological labels of interest groups reflect an accurate portrayal of the organization, RB responded:

In general, our organization tries to be centrist. From time to time there are issues from the conservative side that challenge us. For example, we had a legislator from a conservative state question items on one of our assessments because they spoke about evolutionism versus creationism. Our stance is that no assessment should be used in and of itself to make critical decisions about students. We believe that multiple measures of student performance should be used in the decision-making process.

I asked about the organization’s decision-making process in policy issues, to which RB replied:

I wouldn’t define it as a process. Our executive leadership determines our involvement. Director-level constituents comment on issues and they are dealt with at the executive leadership level. This includes our D.C.-based strategic initiatives office. So, there is not a corporate-wide process involved. It includes our C.O.O. and about ten others who determine our involvement.

Finally, when asked if there was any other information about the organization that would shed light on how educational policy takes shape, RB stated:

I’ve been with the organization for more than 27 years, and we have evolved significantly - evolution over the last 10 years, in particular, with regard to educational policy. We have a lot of good data that tells us important things and what we might want to do.
Responses to questionnaire items 4-7 through were consistent with their publications, literature, policy statements, and website discourse.

Interest Group C

Background

Interest Group C (IGC) was created in 1965 as an interstate compact to improve public education by facilitating the exchange of information, ideas and experiences among state policymakers and education leaders. The organization’s officers, commissioners, and steering committee members consist of Governors, state legislators, state and university higher education officials, state superintendents of instruction, and school district superintendents. IGC’s mission statement indicates that the organization helps states develop effective policy and practice for public education by providing data, research, analysis and leadership; and by facilitating collaboration, the exchange of ideas among the states and long-range strategic thinking. The organization’s vision is to be the leader and key resource in the process through which the states continually learn from one another as they work to improve teaching and learning for their citizens.

IGC engages in six core areas of work: 1) Providing news and information, 2) Policy research and analysis, 3) State, regional and national policy conferences, 4) Customized technical assistance, 5) Publications, and 6) Networks and partnerships. Further research on these six core areas found that the organization provides extensive information for policymakers on their website or in their clearinghouse. They also provide two electronic publications that highlight state policy trends and top national education news items. IGC also informs policymakers as to what is happening in
education from state to state by gathering, analyzing and disseminating information about current and emerging issues, trends and innovations in state policy. The organization brings together policymakers and practitioners from all levels in education for state, regional, and national seminars and workshops. It tailors its services to meet individual states’ needs, interests and resources in order to assist policymakers to make informed decisions for their state. IGC also released numerous publications each year, including their bimonthly report, *The Progress of Education Reform*. Finally, the organization supports and participates in a variety of networks for legislators, legislative aides, governor’s education policy aides and others to share information, ideas and resources. In terms of policy, IGC targeted greater depth and understanding of six key policy areas: 1) accountability, 2) citizenship, 3) early learning, 4) leadership, 5) postsecondary and workforce development, and 6) teaching quality. They are also targeting three P-20 cross-cutting issues including P-20 restructuring, early childhood education, and school finance.

**Ideology**

As noted in its publications, IGC is the only nationwide, nonpartisan organization that brings together key leaders from a variety of sectors to work side by side to improve education. The organization also claims to be the leading nonpartisan source of information, ideas and leadership on education policy. The chairman and vice chairman of IGC are held by a governor and a state legislator, respectively, alternating between the two major political parties. Using Rich’s (2004) ideological model, nonpartisan (or centrist) ideological language was found to be consistent and pervasive across the organization’s publications, reports, and website discourse.
Respondent C

Respondent C (RC) agreed to participate in the study following a direct phone request to the organization. RC is a Vice President of IGA, holds a Bachelor’s degree in education, and has served on state and local school boards near the organization’s headquarters. The respondent answered the items on the questionnaire in writing on October 29, 2012, and emailed the responses back to me. The answers provided were clear and concise, so no follow-up communication was made to RC.

Item number one on the questionnaire asked RC about the primary intents of RTTT before it was enacted. RC responded by stating: “The primary intent was to incentivize changes that the Department Administration believed to be important to improvements in student achievement.” When RC was asked about how RTTT is working today, the response was: “The fiscal incentives have generated a high degree of legislative action in support of education policy reforms that were previously not politically possible.” The respondent was then asked if there could be a ‘do over’ on RTTT, how might it change and the response was:

There has been a level of resentment bubbling from the states – regarding a broad sense that they were held hostage to indirect ‘mandates.’ On the other hand, those goals (or indirect ‘mandates’) helped provide political cover for those responsible for improving the education systems in the states. It has turned out to be a very effective tool for driving needed changes.

Table 15 below illustrates responses to questions one through three using the CARMA protocol.
In terms of discourse, there was convergence between the respondent’s expectations of RTTT legislation before it was enacted with what is now evident in the policy. This was further confirmed by the answer to item three in that no changes were recommended. Discourse consistency was also found between the respondent’s answers to items one through three and the mission and initiatives of the organization.

Item four inquired about how the federal rulemaking process informs policy language, to which RC replied:

The process supports input from stakeholder groups. Unfortunately, those who actually make (state) policy (legislatures), are not directly targeted for input. Those who weigh in typically appear to come from organizations or groups or state departments tasked with administration of policies. It could be helpful if state legislatures were to be more directly asked for their input. It is only with consensus among their ranks that state policy gets made.

Table 16 demonstrates the federal policy process from the perspective of Interest Group C.
Table 16

*Interest Group C - Federal Policy Process*

<table>
<thead>
<tr>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Input Stakeholder Groups</td>
<td>Policy Language</td>
<td>Federal Rulemaking</td>
</tr>
<tr>
<td>(Expansion of stakeholder groups was recommended)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

When asked about whether ideological labels of interest groups reflect an accurate portrayal of the organization, RC stated: “There is an overuse of the term ‘nonpartisan.’ Our organization truly is nonpartisan, but there are many other organizations claiming to be that are not.” The respondent was then asked about the organization’s decision-making process in policy issues, to which RC replied:

> We rarely take formal stands, as that entails gathering input from our very broad base of Commissioners, and that is difficult and time consuming to do. We did, for example, make recommendations early on re: modifications necessary for NCLB. We vetted those recommendations with our Commissioners (see Report to the Nation, 2004). We provide expert advice on issues when asked. We do not lobby, as we maintain 501-(c)-3 status.

Finally, when asked if there was any other information about the organization that would shed light on how education policy takes shape RC stated:

> We make recommendations to policymakers based on the best evidence and knowledge available. We operate from facts, not dogma or political philosophy,
and we always have the end in mind: the deepest learning, skills and dispositions of children and adults.

Responses to questionnaire items 4-7 were very consistent with language in their publications, literature, policy statements, and website discourse.

**Interest Group Cross-Case Analysis**

Table 17 below illustrates responses from questionnaire items 1-3 for Interest Groups A, B, and C.

Table 17

*Interest Groups A, B, and C Questionnaire Items 1 – 3 using CARMA*

<table>
<thead>
<tr>
<th>Case</th>
<th>Question 1 Expected</th>
<th>Question 2 Evident</th>
<th>Question 3 Do over</th>
<th>Convergent/ Divergent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest Group A</td>
<td>A) Support CCSSI</td>
<td>A) RTT priorities supported</td>
<td>A) No change</td>
<td>Convergent</td>
</tr>
<tr>
<td>B</td>
<td>B) Implement CCSSI and common assessments</td>
<td>B) Inconsistent but ongoing implementation</td>
<td>B) No change</td>
<td>Convergent</td>
</tr>
<tr>
<td>C</td>
<td>C) Incentivize change</td>
<td>C) Policy reforms supported</td>
<td>C) No change</td>
<td>Convergent</td>
</tr>
</tbody>
</table>

Each interest group respondent replied that the organization’s expectations of RTTT before it was enacted were consistent with what is evident as the policy is implemented today. That is not to imply that implementation has been without criticism. Respondent B indicated that there was inconsistency in implementation, but that the expectations appear to be consistent with policy goals. Respondent C indicated that additional

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stakeholders should have been involved in early policy discussions, but that the expectations appear to be consistent with policy goals today. Convergence for each interest group was confirmed by responses to question three in that no changes would be recommended if given the opportunity for a ‘do over.’ In addition, the response language for questions 1-3 from each interest group representative was consistent with each organization’s mission, initiatives, publications, and website discourse.

Table 18 highlights responses from questionnaire item number four for Interest Groups A, B, and C.

Table 18

*Interest Groups A, B, and C Questionnaire Item 4 – Federal Policy Process*

<table>
<thead>
<tr>
<th>Interest Group</th>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Dialogue</td>
<td>Policy Language</td>
<td>Federal Rulemaking</td>
</tr>
<tr>
<td>B</td>
<td>Dialogue and Data to Inform Policy</td>
<td>Policy Language</td>
<td>Federal Rulemaking and Organizational Monitoring</td>
</tr>
<tr>
<td>C</td>
<td>Input Stakeholder Groups</td>
<td>Policy Language</td>
<td>Federal Rulemaking</td>
</tr>
</tbody>
</table>

When respondents were asked about how the federal rulemaking process informs education policy language, the discourse in their responses was consistent. Each respondent indicated that the federal policy process begins with dialogue and/or input from education stakeholder groups. Dialogue then informs policy language, which takes shape in stage two. Once policy language is crafted, the federal government then begins the rulemaking process.
Table 19 illustrates responses from questionnaire items 5-7 for Interest Groups A, B, and C.

Table 19

*Interest Groups A, B, and C Questionnaire Items 5 – 7*

<table>
<thead>
<tr>
<th>Interest Group</th>
<th>Question 5 Ideology</th>
<th>Question 6 Decision-making Process</th>
<th>Question 7 Engage in Policy Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Bipartisan</td>
<td>Strategic Policy Plan</td>
<td>Driven by state needs and requests</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Board of Directors</td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Centrist</td>
<td>Executive Leadership</td>
<td>Data to inform policy</td>
</tr>
<tr>
<td>C</td>
<td>Nonpartisan</td>
<td>Gather Input from Commissioners</td>
<td>Data to inform policymakers</td>
</tr>
</tbody>
</table>

Responses to item 5 regarding the organization’s ideology were consistent in that they did not readily place any of them in either broad ideological category – conservative or liberal (Rich, 2004). Item number six asked respondents to describe their organization’s decision-making process around education policy issues. This varied greatly, as Interest Group A determined involvement based upon their strategic plan, but sought governing Board input when policy had fiscal implications. Interest Group B determined engagement at the Executive Leadership level. Group C seldom took formal policy positions, but when they did, they gathered input from their governing Commissioners. A consistent theme for responses to question six was that each organization sought counsel from their governing body before they took a stand on education policy issues. Question seven asked each respondent to comment on their organization’s engagement in shaping educational policy. While responses varied, a common theme was that each organization
engaged in shaping educational policy as a response to their constituents. Each offered extensive resources and/or data to their constituents, and Interest Group B and C specifically mentioned the use of data to inform policy and policymakers.

**RTTT Public Comment Analysis**

As discussed previously, this chapter concludes with analysis of public comment made by 24 interest groups following the RTTT notice of proposed priorities, requirements, definitions, and selection criteria (NPP) as published in the *Federal Register* on July 29, 2009. Interest Groups A, B, and C were included as co-authors of the letter submitted to the U.S. Department of Education during the public comment period of the federal rulemaking process. Table 20 below provides the framework for the CARMA protocol that was used to compare interest group public comment language with RTTT final policy language.

Table 20

**RTTT Public Comment Analysis using CARMA**

<table>
<thead>
<tr>
<th>Expected</th>
<th>Evident</th>
<th>Results</th>
<th>Conclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest Group Public Comment Language</td>
<td>RTTT Final Policy Language</td>
<td>Convergent vs Divergent</td>
<td>Influence vs No influence</td>
</tr>
</tbody>
</table>

The letter co-authored by 24 interest groups following the NPP referenced RTTT Priority One: Absolute Priority – Comprehensive Approach to Education Reform, specifically the subsections on Standards and Assessments and Data Systems to Support Instruction. The
letter also referenced Priority Four: Invitational Priority – Expansion and Adaptation of Statewide Longitudinal Data Systems. Therefore, analysis of public comment for purposes of this study focused only on the recommendations made by the interest groups for these specific subsections of RTTT. Moreover, only those comments that prompted changes in final RTTT policy language were analyzed using the CARMA protocol. The interest groups that co-authored the letter during the public comment period for RTTT made 15 recommendations to the U.S. Department of Education. Three of these recommendations prompted the Department to make changes in final RTTT policy language. To read the letter in its entirety, see Appendix E. Using the CARMA protocol, Appendix C compares these recommendations with final RTTT policy language that was changed as a result of public comment.

Following public comment for RTTT, the U.S. Department of Education made three changes to the language in Priorities Four and Five. When the language in these changes was compared to the language in the recommendations made by the interest groups that made public comment regarding Priorities Four and Five, there were three areas where language was convergent. Other changes made by the Department expanded definitions to be more inclusive. In those instances, public comment was neither convergent nor divergent. All of the other recommendations made by the interest groups during the public comment period resulted in no changes in RTTT final policy language.

**Theoretical Applications**

This section of chapter four applied both the Agenda Setting model and the Sensemaking model to the findings to better understand how RTTT took shape and how interest group networks played a role in influencing federal education policy.
**Agenda Setting**

In Kingdon’s (2003) agenda setting model, three independent streams converge to open a window of opportunity for policy creation. Figure 1 below illustrates the application of Kingdon’s theoretical framework to the RTTT federal education policy process. The **policy stream** constitutes stakeholders both inside and outside the government. This stream attempts to identify the stakeholders most likely to get a policy proposal on the federal agenda. In this study, the policy stream consisted of the education interest groups outside the government that co-authored a letter regarding RTTT during the public comment period. In addition, the U.S. Department of Education is a key stakeholder inside the government. The **problem stream** is the manner in which policy proposals come to the attention of government officials. The problem stream has three components – indicators, focusing events, and feedback – providing stakeholders both inside and outside of government the opportunity to participate in the pre-proposal stage of federal rulemaking. In this study, the problem streams consisted of a call for states to adopt common standards and longitudinal data systems. Finally, according to Kingdon (2003), the **political stream** includes “just about any activity related to the authoritative allocation of values, or to the distribution of benefits and costs” (p. 145). There are three components within the political stream – national mood, organized political forces, and the government itself. The political stream in this study was comprised of first term President Barack Obama, U.S. Secretary of Education Arne Duncan, and a national post-NCLB mood calling for more consistency in policy implementation. I believe Kingdon’s agenda setting model provided an important framework for understanding the RTTT federal rulemaking process and the influence of interest groups.
A second lens from which to frame the study came from Weick’s (1995) notion of sensemaking. Sensemaking is about “the ways people generate what they interpret” (p. 13). We are constantly engaged in making sense of our environment through the influence of seven interrelated properties that include: identity construction, retrospection, extracted cues, plausibility, the environment, social functions, as is ongoing. Figure 2 below illustrates the sensemaking theoretical framework as it applies to this study. In policymaking, sensemaking is a heuristic for understanding the processes that lead to educational policies within an organization like the federal government. According to Mills, Thurlow, and Mills (2010):

This framework takes a complex combination of variables including social psychological properties, discourse, organizational rules, and formative context in which organizations exist and offers an analysis of how these forces combine to allow individuals to make sense of their environments and take action on a day-to-day basis (p. 190).
A social psychological factor in this study included the post-NCLB demands from states for policy that was less restrictive and punitive. Discourse in this study included the public comments made by education interest groups during the informal stage of the rulemaking process. The organizational rules in this study were the federal rulemaking processes during the informal stages. Finally, the formative context was the RTTT competitive education reform grant application process. I believe sensemaking offered an insightful lens to understand the influence of interest groups during the early stages of the policymaking process.

Figure 2. Sensemaking Model and RTTT

Summary

This chapter presented background and overview of the Race to The Top (RTTT) federal education policy, including its funding priorities and its evolution through the federal rulemaking process. It also provided information on interest group selection and
data collection processes, including participation in the rulemaking process. Each participating interest group was analyzed, and this included background, ideology, respondent questionnaire data, and interest group perspective on the federal education policy process. Interest group cross-case analysis was also presented. Finally, analysis of public comment language and final RTTT policy language was included in the chapter. Chapter five will incorporate the conceptual framework, the research questions, theoretical perspectives, and findings to address the conclusions and interpretations of the study.
CHAPTER 5

SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS

This study was framed around two research questions: 1) In what ways do different interest groups influence the rulemaking process in the development of federal education policy? and 2) In what way does the rulemaking process support or reinforce democratic principles? The findings presented in chapter four shed light on these questions. In this chapter, I will discuss the findings that highlight the importance of interest group networks and the significant resources they can provide to inform policy and policymakers. I will also discuss the relevance of the federal rulemaking process and of advocacy as a principle of democracy. Connections will be made between the findings and current literature throughout the discussion. The chapter will further explore the implications of the study in relation to future policy, practice, leadership preparation, and research. Finally, I will conclude the chapter by examining the limitations of the study.

Summary of Research Findings

In what ways do different interest groups influence the rulemaking process in the development of federal education policy?

Based on the results of this study, I found two important ways that interest groups may influence the development of federal education policy. First, networks or coalitions of education interest groups may gain better leverage to influence the development of federal policy than individual groups acting alone. Second, education interest groups that have resources, such as data, research, or strategic leadership may have greater capacity
to influence policy development than those groups with limited resources. Both of these issues will be further explored in greater detail.

**Education Interest Group Networks**

DeBray-Pelot and McGuinn (2009) wrote:

No Child Left Behind (NCLB) provided the impetus for state leaders to mobilize on behalf of greater flexibility, for coalitions supporting and opposing the law’s mandates to form, and for think tanks to develop new agendas with greater sophistication – all indicators that, as Carl Kaestle (2007) noted, it is the polity itself that has shifted (p. 38).

With regard to *Race to The Top*, the authors wrote, “New policy has created new politics in education, in the sense that the law has spurred the mobilization of established interest groups, induced the creation of new entrants, and pushed these groups into new and often cross-cutting coalitions” (p. 38). The findings of this study suggest that DeBray-Pelot and McGuinn’s comments on the post-NCLB polity have, in fact, fostered state leaders to form networks or coalitions to influence the shaping of today’s education policy.

**State Networks and the National Governors Association**

As mentioned in chapter four, the interest groups that co-authored the letter to the U.S. Department of Education during the public comment period for RTTT were members of the Data Quality Campaign (DQC) coalition. As noted on DQC’s website, “As DQC partners, these organizations have committed to working independently and collaboratively to advance the effective use of high-quality education data to improve student achievement.” One organization that connected each of the interest groups in this
study and those in the DQC coalition was the National Governors Association (NGA). Founded in 1908, the NGA is a bipartisan organization of the nation’s governors that provides services ranging from representation of governors and their staff on Capitol Hill to the development of innovative solutions on public policy challenges through their NGA Center for Best Practices. In addition to support of the Data Quality Campaign initiative, the NGA coordinates the state-led Common Core State Standards Initiative (CCSSI). Each of the interest groups in this study was also found to support implementation of the CCSSI. As discussed in chapter four, a key area of research for Interest Group A included implementation strategies for CCSSI. Interest Group B provided expansive longitudinal data on academic achievement and college readiness to NGA in order to determine what knowledge and skills should be included in the standards. Interest Group C developed Core Commons to serve as a resource to states, policymakers and the public on the implementation of the Common Core State Standards Initiative. Organizations like the National Governors Association that have the ability to convene state networks and education interest group coalitions to support RTTT policy priorities provide one example of today’s changing polity.

**State Networks and The Education Trust**

A second entity that connected each of the interest groups in this study was The Education Trust. Founded in 1992, The Education Trust (Ed Trust) is a national nonprofit that promotes high academic achievement for all students at all levels, pre-K through college. Their goal is to close the gaps in opportunity and achievement that commit students – particularly those from low-income families or who are black, Latino, or American Indian – to lives on the margins of the American mainstream. Two core initiatives supported by Ed Trust include the DQC and the CCSSI, as they support the
organization’s high standards and high-quality assessments advocacy agenda. Much like the NGA, Ed Trust has the ability to convene state networks and interest group coalitions to support education reform. A critical difference is that while the NGA convenes state leaders and organizations to support federal reform priorities, Ed Trust convenes organizations that McGuinn (2012) refers to as education reform advocacy organizations (ERAOs) to support state reform priorities. The largest of these organizations includes Stand for Children, Students First, 50-State Campaign for Achievement Now (50CAN), Democrats for Education Reform (DFER), and the Foundation for Excellence in Education (FEE).

While organizations like Ed Trust primarily engage in research and advocacy, ERAOs are more explicitly political (McGuinn, 2012). The Education Trust and the Policy Innovators in Education Network (PIE) regularly convene the 34 organizations comprising 23 states in this network that also includes business groups like Colorado Succeeds, civic groups like Advance Illinois, and policy partners that include: Center for American Progress, Center on Reinventing Public Education, Education Sector, National Council of Teacher Quality, and the Thomas B. Fordham Institute. This network encourages cross-state collaboration (including language for legislative policy) to accelerate the state-level school reform movement on such issues as teacher quality, school choice, school performance data, and parent advocacy campaigns. According to McGuinn (2012), RTTT created momentum behind reform at the state level by providing political cover for reformers. As a result of RTTT, organizations like The Education Trust have the ability to convene state networks and education interest group coalitions to support state policy priorities, which provides another example of today’s changing polity.
Interest Groups and Resources

The findings also suggest that education interest groups with tangible resources, such as data, research, or strategic leadership, may have greater capacity to influence policy development than those groups with more limited resources. Each of the interest groups in this study retain a variety of resources to support initiatives like the DQC and the CCSSI, which ultimately aid states to meet RTTT competitive grant priorities. Interest Group A has the resources to provide technical assistance to states on the design, development, adoption, implementation, and communications of their college- and career-ready standards, assessments, curriculum, and accountability systems. They also have the capacity to conduct research and development efforts to advance the work of states, including implementation strategies for the Common Core State Standards Initiative (CCSSI).

In terms of research and policy, Interest Group B has a team of researchers, data analysts, and psychometricians with longitudinal data and extensive resources in the areas of assessment, curriculum, enrollment and retention, skills development, and education policy. Interest Group C has vast resources to assist states in developing effective policy and practice for public education by providing data, research, analysis and leadership, and by facilitating collaboration of ideas including long-range strategic planning. As Respondent B stated:

We are now at the table in Washington, D.C. Our visibility has risen dramatically. We are at the table because of the work we’ve done to inform policy. We are respected because we have the information and the data to inform policy.
As DeBray-Pelot and McGuinn (2009) stated: “In the new pluralistic and information-rich post-NCLB environment, interest groups and organizations can no longer afford not to put forward innovative proposals, forge coalitions, and actively communicate with members” (p. 39).

In what way does the rulemaking process support or reinforce democratic principles?

Based on the results of this study, I found that the rulemaking process supported democratic principles in two ways: legitimacy and acceptance. Both of these issues will be explored below in greater detail.

Rulemaking

Prior to addressing the democratic principle of government legitimacy, I would like to briefly discuss eRulemaking, which enables the citizenry to make public comment during the rulemaking process. According to the regulations.gov website, ERulemaking was established in October 2002 as an E-GOV initiative committed to: 1) Increasing access to and participation in developing regulations and other documents that impact the public, and 2) Promoting efficient and effective rulemaking through public involvement. In 2003, the eRulemaking program launched the regulations.gov website to enable citizens to search, view and comment on regulations issued by the U.S. government. Since its inception, the U.S. Environmental Protection Agency (EPA) has served as the managing partner of the eRulemaking Program. Prior to 2003, citizens interested in making public comment on a regulation would have to know the sponsoring governmental agency and when the regulation was published. They would then have to review it in a reading room, make comments, and ensure delivery of the comments to the
appropriate agency. With federal agencies and departments issuing nearly 8,000 regulations per year, the rulemaking.gov website enables the citizenry to make comments and shape rules and regulations from any computer. I found the regulations.gov website to be relatively user-friendly, but that was because I spent a fair amount of time navigating the site. First-time users and those who may not be comfortable with website navigation may find the site to be challenging. That said, the process is much more accessible to the citizenry than the system previously in place before the launch of the website.

**Legitimacy**

The regulations.gov website refers to four democratic principles that detail why public comments make a difference in regulatory policy: 1) Legitimacy, 2) Responsiveness, 3) Acceptance, and 4) Public Interest. The principle of legitimacy suggests that participation lends democratic credibility to regulatory decisions. Responsiveness means that the government can respond to people’s needs, grievances, or suggestions. Comments can also clarify the legislative intent of Congress. The principle of acceptance implies that comments can assist the ability of agencies to determine the level of acceptance or resistance among the citizenry to a particular rule or regulation. Finally, the principle of public interest suggests that comments shape how the public interest will be served by the rule.

The findings of this study suggest that the principle of *legitimacy* or democratic credibility was evident in the rulemaking process. Using the co-authored letter signed by 24 education interest groups as a primary data source, transparency and authenticity were evident. Upon closer examination of the interest groups that co-authored the comments, the citizenry at large and the U.S. Department of Education in particular would find
robust public documentation of the interest groups’ work and of their individual and collective credibility. Many of these same interest groups participated in early discussions with the Department prior to RTTT legislation due to their legitimacy as members of critical state education networks and because of their extensive research and data collections. In addition, review of the language in the public comments made by the interest groups finds commendation of the Department and of the Secretary of Education no less than seven times. The co-authors concluded their public comment by stating:

We applaud the Department of its leadership in promoting data as a foundational element of all education reforms. We thank the Department for the opportunity to review this historic grant application. . .and look forward to working in partnership with the Department and the states in the groundbreaking efforts to transform education into a data-informed enterprise (p. 8).

Participation by this coalition of education interest groups in the rulemaking process added to the credibility or democratic legitimacy of RTTT.

Acceptance

The findings of this study support the democratic principle of acceptance in that the public comments made by the education interest groups provided the U.S. Department of Education a clearer sense of acceptance or resistance among the citizenry. While fifteen recommendations were made by the coalition to the Department, as previously noted, seven commendations were also made of the Secretary and the Department. This feedback loop for post-NCLB education policymakers is important, as No Child Left Behind was found to be flawed by many governors, state legislatures, chief state school officers, and school districts in terms of implementation, unfunded requirements, and compliance mandates (DeBray-Pelot & McGuinn, 2009). Moreover,
McGuinn (2011) stated: “RTTT may be best understood as an attempt by the Obama administration to respond to the failures of NCLB” (p. 153). As discussed in chapter four, following the initial notice (NPP) of RTTT, 1,161 commenters submitted thousands of unique comments, ranging from one paragraph to 67 pages (U.S. Department of Education, 2009). The Department noted that commenters included parents, professional associations, public officials, teachers, principals, governors, and chief state school officers. Individuals from all 50 States and the District of Columbia, including more than 550 individuals and 200 organizations, commented on the NPP. As a result, the Department stated that there were “a number of differences between the NPP and the notice of final priorities, requirements, definitions, and selection criteria” (p. 59688). While there may have been a number of changes in overall final RTTT policy language, there were few changes in the sections pertaining to Priorities four and five. Fifteen recommendations were made by the interest groups in this study, but just three actually resulted in changes made by the Department. Public comment resulted in a twenty percent change in policy language. While some may feel this was disappointing, I believe this illustrates the democratic principle of acceptance. In fact, it demonstrates that a network of interest groups cannot unduly influence federal education policy. The U.S. Department of Education is able to gauge the will of the people by the language found in public comment. Whether changes in language were granted or not, the citizenry had the right to make comment. For these reasons, this study found that the rulemaking process supported the democratic principle of acceptance as the federal RTTT education policy took shape.
Conclusions

As a result of this study, I believe that education leaders must become active participants in the policy process. We are ultimately charged with implementing policies at the district- or school-level, so it is incumbent that we are involved as policies take shape. In order to do so, conclusions drawn from this study in the areas of: 1) policy, 2) practice, and 3) research will be given greater consideration in this section.

Policy

The findings from this study suggest that the success of future federal education policy may require the participation of state networks of education interest groups prior to the rulemaking process, through to the final published federal policy, and then to implementation. Two core tenets of RTTT included rigorous common state standards and longitudinal data systems. Education interest groups that were members of state networks in support of these tenets and those that had the resources necessary to assist states at implementation were those “at the table.” The question remains, however, which groups were not at the table? As the next round of RTTT competitive grants were released to school districts rather than states, the U.S. Department of Education and individual school districts needed to consider this question. This question may be illustrated by a recent news story in Clark County, NV. In October 2012, the Clark County School District was preparing to submit its district-level RTTT grant application valued at nearly $40 million. The grant application required that the local teacher’s union sign-off in support of the district’s grant proposal. The local teacher’s union refused to sign-off on the application citing they were not included in discussions to develop proposal language. The Governor of Nevada stepped-in to mediate between the school district and the union. In the end, minor changes were made to the application and it was
submitted to the U.S. Department of Education just before the deadline. This dramatic example sheds light on the importance of inclusivity of interest groups in meaningful dialogue as policy takes shape.

**Practice**

Based upon the results of this study, I believe practitioner leaders in education must become what Anderson (2009) referred to as “advocacy leaders.” Anderson proposed three critical means by which education leaders must adapt to the changing context of leading America’s public schools: 1) become knowledgeable about the political and economic shifts that impact students, 2) become engaged in the political contexts that shape the schooling experiences of students – particularly in urban and rural schools, and 3) become prepared to blend educational leadership research and preparation with policy analysis. Anderson stated that school leaders “must become attentive to and engaged in the political processes shaping the conditions under which students are educated in U.S. public schools” (p. xiii).

In addition to advocacy leadership, this study underscores the importance of leadership preparation and development programs that teach aspiring and current leaders about policymaking, networks, and advocacy at the federal and state levels. This will require restructuring higher education programs from the traditional instructional leader perspective to an advocacy leader perspective. In order to become advocacy leaders, our nation’s colleges and universities must begin to challenge the longstanding status quo in the preparation and development of future education leaders. Understanding how education policy takes shape and how we as educators, leaders, and citizens must actively advocate and participate will be critical to the future of American public schools.
A final conclusion from this study in the area of practice is the importance of education leaders participating in professional associations, advocacy coalitions, or education interest groups. As Ravitch (2010) stated:

Administrators who try to ignore the outside world will find themselves on the receiving end of many policy surprises. They need to be aware of the major changes occurring in their social and economic environment and of how those changes may eventually give rise to education policy issues. They need to know what issues are being defined in think tanks, universities, and foundations. They also need to follow the legislative process at the federal and state levels. More than ever, then, it is essential for school leaders to be professionally active and informed (p. 21).

The democratic principles of legitimacy and acceptance appear to be enhanced through membership in credible coalitions or groups. Therefore, it is our duty as citizens and as leaders to be active participants in this process. We must be reminded that advocacy, policy, and politics impact our students each and every day.

**Recommendations**

**Critique of Research**

The specific design structure for this study incorporated select interest groups as case studies for research. This collective case study explored the complexities within each interest group and their linkages to the current social context of post-NCLB education policymaking. Further, cases were analyzed for their influence on federal policy during the informal rulemaking process. I chose this design because there was little research on the impact of interest groups on federal education policy during the rulemaking process. This study drew upon the work of two existing dissertations: the first
examined the influence of interest groups on federal environmental policy (Rinfret, 2009), and the second focused on the influence of interest groups on education media stories (McDonald, 2008).

Due to time constraints to complete the study, purposeful sampling was used to solicit participation. As a result, each interest group was very similar in the following ways: 1) Mission to support states, 2) Abundant resources - Research/data/leadership, 3) Ideology, and 4) Policy and advocacy agendas. If time were not an issue, effort would have been made to enlist interest groups with greater differences in a variety of background areas. I would have been particularly interested in understanding the participation of teacher’s union groups, such as the National Education Association (NEA) and the American Federation of Teachers (AFT), as they were traditionally the largest interest groups participating in policymaking discussions in the past.

Once interest groups were secured, I found the CARMA protocol to be incredibly adaptive for application to this study. I adapted CARMA to examine interest group perspectives on the policymaking process and RTTT specifically, as well as the influence of public comment on policy language at the federal level during the rulemaking process. Again, if time were not an issue, it would have been helpful to examine additional public comments to better understand the impact of this process on policymaking. There is little evidence in this study that public comment made a significant difference in final policy language. Influence, however, is a difficult construct to measure with certainty. Based upon the findings of this study, it may have been more useful to better understand the kinds of networks at the table as RTTT policy took shape rather than their influence. This would highlight the “in” groups versus the “out” groups in the ever-changing education policy. Finally, I would have been interested in further exploring the formal
and informal discussions that took place between the Department of Education and the various interest groups before RTTT language was drafted. This would have shed additional light on how policy priorities and language took shape.

**Future Research**

A recommendation from this study for educational policy scholars is to draw upon policy feedback. To summarize this research, McDonnell (2009) stated: “policies enacted and implemented at one point in time shape subsequent political dynamics so that politics is both an input into the policy process and an output” (p. 417). Like McDonnell, I believe this will be important, as policy feedback can inform the design of future education policies by incorporating the institutional and/or systemic effects policies have on governance and on services delivered. A second recommendation from this study is understanding how education policy takes shape at the state level. As coalitions, interest groups, and education reform advocacy organizations increase in number at the state level, it will be important for scholars to better understand the state level education policy process.

**Limitations**

The first limitation of this study is that it examined one federal agency, the U.S. Department of Education. In addition, just three interest groups were studied as opposed to multiple groups. A third limitation is that one designee from each interest group was interviewed and/or completed the informational questionnaire, in contrast to groups or entire departments/units participating in the study. Finally, the interview data was dependent upon retroactive sensemaking (Weick, 1995), in that the study focused on policy and influence for legislation already enacted.
Final Thoughts

When I began exploring this area of study in June 2009, I was interested in the influence of interest groups, and in particular think tanks, on federal education policy. These Washington, D.C.-based groups discussed at length in chapter two were those gaining scholarly and media attention at the time. The RTTT state grant notice had just been published, and President Barack Obama had taken office with Arne Duncan as Secretary of Education. The national mood around education at the time was a deepening frustration with the restrictive mandates of No Child Left Behind.

Today, in November 2012, the RTTT district grant competition deadline has just passed, President Barack Obama was just re-elected, and the national mood around education has been buoyed by state waivers from No Child Left Behind mandates. As a result, interest groups that once held prominence in discussions with policymakers in the past, have had to share this space with new groups. These groups are connected through sophisticated state networks and information-rich resources. So while interest groups in the education polity have expanded, the findings from this study suggest the motivation behind this expansion has not changed. Truman’s (1951) definition of interest groups suggested that persons united on the basis of one or more shared attitudes and beliefs. These persons then came together to protect their own interests, make claims upon other groups, and ultimately influence policymaking. With this, I believe this study further supported the synergy and fluidity between education policy and the education polity. As future education policy takes shape at the federal or state levels, education leaders simply must be part of this dynamic process.
APPENDIX A

EDUCATION RESEARCH AND POLICY ANALYSIS FRAMEWORK AND THINK TANK IDEOLOGY

<table>
<thead>
<tr>
<th>Education Policy</th>
<th>Neo-Liberal/ Libertarian</th>
<th>Neo-Conservative</th>
<th>Centrist</th>
<th>Liberal/ Progressive</th>
</tr>
</thead>
<tbody>
<tr>
<td>Role for Free Markets in Education</td>
<td>Strongly Support</td>
<td>Strongly Support</td>
<td>Moderate Support</td>
<td>Against</td>
</tr>
<tr>
<td>Vouchers</td>
<td>Strongly Support</td>
<td>Strongly Support</td>
<td>Against</td>
<td>Against</td>
</tr>
<tr>
<td>Charter Schools</td>
<td>Strongly Support</td>
<td>Strongly Support</td>
<td>Moderate Support</td>
<td>Little Support</td>
</tr>
<tr>
<td>Teacher’s Unions</td>
<td>Strongly Against</td>
<td>Strongly Against</td>
<td>Moderate Support</td>
<td>Strongly Support</td>
</tr>
<tr>
<td>National Standards</td>
<td>Strongly Against</td>
<td>Strongly Support</td>
<td>Strongly Support</td>
<td>Strongly Against</td>
</tr>
<tr>
<td>National Curriculum</td>
<td>Strongly Against</td>
<td>Strongly Support</td>
<td>Moderate Support</td>
<td>Strongly Against</td>
</tr>
<tr>
<td>Federally Mandated Tests</td>
<td>Strongly Against</td>
<td>Strongly Support</td>
<td>Strongly Support</td>
<td>Strongly Against</td>
</tr>
<tr>
<td>Affirmative Action</td>
<td>Strongly Against</td>
<td>Strongly Against</td>
<td>Moderate Support</td>
<td>Strongly Support</td>
</tr>
<tr>
<td>Bilingual Education</td>
<td>Strongly Against</td>
<td>Strongly Against</td>
<td>Moderate Support</td>
<td>Strongly Support</td>
</tr>
<tr>
<td>Universal Preschool</td>
<td>Strongly Against</td>
<td>Strongly Against</td>
<td>Moderate Support</td>
<td>Strongly Support</td>
</tr>
<tr>
<td>Increased Spending</td>
<td>Strongly Against</td>
<td>Strongly Against</td>
<td>Moderate Support</td>
<td>Strongly Support</td>
</tr>
<tr>
<td>Education Inequality (Race, class, gender)</td>
<td>Strongly Against</td>
<td>Strongly Against</td>
<td>Moderate Support</td>
<td>Strongly Support</td>
</tr>
</tbody>
</table>

Source: McDonald, 2008, p. 150
### Summary of Interest Group RTTT Recommendations

<table>
<thead>
<tr>
<th>Recommendation Number</th>
<th>Recommendation Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Clarify Family Education Rights and Privacy Act (FERPA)</td>
</tr>
<tr>
<td>2</td>
<td>States to develop a cross-sector/agency governance plan</td>
</tr>
<tr>
<td>3</td>
<td>Upgrade development of a P-20/workforce data system to an absolute priority</td>
</tr>
<tr>
<td>4</td>
<td>Upgrade Expansion and Adaptation of Statewide Longitudinal Data Systems to a competitive priority</td>
</tr>
<tr>
<td>5</td>
<td>Group the expansion of statewide longitudinal data systems into four, non-mutually exclusive categories</td>
</tr>
<tr>
<td>6</td>
<td>Link data systems across P-20 for vertical alignment</td>
</tr>
<tr>
<td>7</td>
<td>Assess how data is transformed into actionable use</td>
</tr>
<tr>
<td>8</td>
<td>Require states to provide data in user-friendly format, and provide timelines, communications plans and training</td>
</tr>
<tr>
<td>9</td>
<td>Require states to indicate how training will be provided and how data will be provided to educators</td>
</tr>
<tr>
<td>10</td>
<td>Require states to elucidate the state’s and district’s relative roles in data collection, sharing, and reporting</td>
</tr>
<tr>
<td>11</td>
<td>Require teacher/principal effectiveness data be provided to the public and to teacher/principal preparation programs</td>
</tr>
<tr>
<td>12</td>
<td>Require states to provide teachers/principals with autonomy to make decisions based upon data analysis</td>
</tr>
<tr>
<td>13</td>
<td>Require states to use an early warning data system to identify and support students at-risk of dropping out or not graduating</td>
</tr>
<tr>
<td>14</td>
<td>Encourage states to describe how RTTT funds will be used to build state agencies’ capacity to implement, scale, and sustain the state’s plan</td>
</tr>
<tr>
<td>15</td>
<td>The Department must work to ensure that its requests for data reflect an integrated and coordinated approach</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Expected</th>
<th>Evident</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest Group Public Comment Recommendations</td>
<td>RTTT Final Policy Language</td>
<td>Convergent vs. Divergent or Other</td>
</tr>
</tbody>
</table>

**Change #1**

*The Department should require states to describe in their plan how they will develop, implement, and use an early warning data system to identify and support students who are at-risk of dropping out and/or not graduating from high school college and career ready.*

*Add the phrase “at risk and dropout prevention programs, as well as information on student mobility” following “early childhood programs” in Priority 4.*

*Add “information on teachers, principals, and other staff” following “human resources.”*

<table>
<thead>
<tr>
<th>Change #2</th>
<th></th>
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</thead>
<tbody>
<tr>
<td><em>State longitudinal data systems can be expanded to link with other critical agencies such as health and human services, child protective services, foster care, corrections, and juvenile justice.</em></td>
<td><em>Added “and other State Agencies and community partners (e.g., child welfare, juvenile justice, and criminal justice agencies)” following “organizations” in the first sentence of the priority.</em></td>
</tr>
</tbody>
</table>

*Other (Expanded Definition)*
<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Change #3</th>
<th>Convergent</th>
</tr>
</thead>
</table>
| *The Department should encourage the collaborative development of process data management systems that are horizontally interoperable (across districts and programs) and vertically interoperable (from districts and states) to reduce duplication and inconsistencies. | *Changed the title of Priority 5 to: P-20 Coordination, Vertical and Horizontal Alignment.  
*Added the following sentence at the end of the priority: “Horizontal alignment, that is, coordination of services across schools, State agencies, and community partners, is also important to ensure that high-need students (as defined in this notice) have access to the broad array of opportunities and services they need and that are beyond the capacity of the school itself to provide.” |            |
| **Recommendation**                                                            | **Change #3**                                                            | **Convergent** |
| *Ensure that all students…are captured in the statewide longitudinal data system…from early childhood, K-12, postsecondary and workforce and training systems… | *Changed “workforce organizations” to “workforce development organizations.”  
*Changed “postsecondary” to “postsecondary/careers.” | Other (Expanded Definition) |
| **Other (Expanded Definition)**                                               |                                                                         |            |
|                                                                                 |                                                                         |            |
APPENDIX D

INTEREST GROUP QUESTIONNAIRE

Organization Name:_______________________________________________

Contact Person Name:_____________________________________________

Contact Person Phone Number:_________________

Contact Person Email:________________________

Before Legislation

1. I am interested in your organization’s views of the Race To The Top federal education policy. Tell me about what you believe to be the primary intents of the policy before it was enacted.

Following Legislation

2. Now that that Race To The Top has been enacted, how do you see the policy working today?

3. If your organization could have a ‘do over’ on Race To The Top, how might it change?

During Legislation

4. Tell me about the informal federal rulemaking process. In what ways does this process inform policy language?

Organizational Questions

5. Some researchers have applied ideological or political labels to organizations like yours, such as neoconservative, centrist, or progressive. In what ways do labels such as these depict an accurate portrayal of the ideological or political stance of your organization?

6. I would guess that your organization engages in some kind of decision-making process before you get involved or take a stand on education policy issues. Can you tell me about that process?

7. Is there anything else you would like me to know about your organization that would shed light on how you engage in shaping educational policy?
APPENDIX E

INTEREST GROUP PUBLIC COMMENT LETTER TO U.S. DEPARTMENT OF EDUCATION

PUBLIC SUBMISSION

Docket: ED-2009-OESE-0006
Race to the Top Fund -- Notice of Proposed Priorities, Requirements, Definitions, and Selection Criteria

Comment On: ED-2009-OESE-0006-0001
Race to the Top Fund

Document: ED-2009-OESE-0006-0848
Comment on FR Doc # E9-17909

Submitter Information

Name: Thomas Lindsley
Address:
    Washington, DC,
Organization: Data Quality Campaign
Government Agency Type: Federal
Government Agency: ED

General Comment

August 28, 2009

Office of Elementary and Secondary Education
Attention: Race to the Top Fund Comments
U.S. Department of Education
400 Maryland Avenue, SW
Room 3W329
Washington, DC 20202

Re: Race to the Top Fund Comments, Docket ID ED-2009-OESE-0006
To Whom It May Concern:

This letter provides comments and recommendations in response to the notice published in the Federal Register of July 29, 2009 regarding the U.S. Department of Education’s Race to the Top Fund (CFDA Number 84.395A).

These comments and recommendations are submitted by the organizations listed, all of whom support states’ efforts to implement statewide longitudinal data systems consistent with principles advocated by the Data Quality Campaign (DQC). In its publication, The Next Step: State Actions to Ensure Effective Data Use, the DQC laid out the steps states must take to maximize the effective
use of newly collected data for the goal of improving student achievement: 1) expand the ability of state data systems to link across the P-20 education pipeline; 2) ensure that data can be accessed, analyzed and used by multiple stakeholders including educators and researchers; and 3) build the capacity of all stakeholders to use longitudinal data. We applaud the U.S. Department of Education (Department) for providing the historic opportunity to transform these “next generation” ideas into realities for states. As proposed, the Race to the Top (RTT) will encourage strategic and comprehensive planning by states around the three areas mentioned above while also encouraging further expansion of the breadth and depth of data systems, supporting effective partnerships with districts around data collection and use and promoting states learning from other states’ data experiences.

Establishing data systems as an absolute priority in the RTT State Reforms Conditions Criteria and aligning these data provisions with the State Fiscal Stabilization Fund indicator requirements and the IES State Longitudinal Data Systems grant applications, sends a strong message about the foundational role of data. All of these three ARRA funding opportunities, especially when approached collectively, provide a strategic opportunity and incentive to engage a broad range of state stakeholders in a thoughtful dialogue around how data systems should be built, expanded, and used to inform decisions throughout the P-20/Workforce pipeline and to improve the outcomes of those systems. In fact, the Department’s release of the Race to the Top grant application requirements has already produced tangible results. Policy discussions and debates that had for too long been seen as “untouchable” are now being discussed and actions being taken. For example, the state of Indiana amended its state statute regarding the use of student performance data for teacher evaluation on June 30, 2009, after the state was identified as ineligible for Race to the Top funds based on its existing statute, and the state of Wisconsin has introduced bills to eliminate the state’s statute which prohibits the linking of student achievement or growth data to teachers for the purpose of teacher and principal evaluation.

The DQC commends the Administration and Congress for their leadership to make the effective use of data in education a priority. We offer broad support of the Race to the Top draft application and provide the following recommendations to help strengthen the role of data in the Race to the Top grant.

OVERALL RECOMMENDATIONS TO STRENGTHEN THE PROPOSED RACE TO THE TOP APPLICATION REQUIREMENTS

One of the greatest burdens and barriers that states face toward fulfilling the Race to the Top grant criteria is the Family Education Rights and Privacy Act (FERPA). Many states are investing a tremendous amount of time and energy to clarify how FERPA applies to the collection, analysis and use of their state longitudinal data systems, particularly whether FERPA prohibits the linking of data systems across sectors.

Recommendation
Clarify FERPA. The partners of the DQC recommend that the Department clarify in the final notification or by other means that the linking and sharing of individual-level student data across sectors, agencies and states is permissible and encouraged.

RECOMMENDATIONS TO STRENGTHEN THE PROPOSED RACE TO THE TOP APPLICATION REQUIREMENTS

Proposed Application Requirements (pg. 37807, column 1)
As mentioned in the Notice, the breadth and scope of the priorities set forth by the Department will require the cooperation and collaboration of a wide range of stakeholders. The DQC commends the Department for requiring the governor, chief state school officer, and the president of the state board of education be signatories for the Race to the Top application. We encourage states to seek broad stakeholder involvement by including those listed in the draft application as well as the state higher education executive, key state legislators, representatives from the state’s workforce agency, and representatives from the early childhood community in the application development process.

Recommendation
The partners of the DQC recommend that the Department require states to provide evidence of support and collaboration by agencies or entities, including but not limited to the signatories, that are essential to fulfilling the terms of the grant and to helping ensure sustained support. Specifically, we recommend the Department require states to develop a governance plan that includes, but is not limited to, the following:
1. Current state initiatives that will be leveraged to support or complement a state’s proposed Race to the Top activities;
2. Roles of personnel across the various sectors / agencies who will be working together on a state’s proposed Race to the Top activities; and
3. Plans for cross-sector / agency collaboration.

Proposed Priority 3: Expansion and Adaptation of Statewide Longitudinal Data Systems (pg 37806, column 1)
Partners of the DQC commend the Department for identifying the need to expand statewide longitudinal data systems as a priority in the application process. We believe this Proposed Priority section requires further clarification and specification so that states are clear about what are non-negotiable requirements in the application and what the Department considers desirable expansions of data systems.

Recommendation 1
Clarify that developing a P-20/workforce data system is an absolute priority. The DQC recommends the Department clearly indicate that the ability to follow an individual from preschool through high school and into postsecondary education, training and the workforce is an absolute priority and not part of invitational Priority 3. Furthermore, the Department should also reinforce that many of these data (early childhood and postsecondary) should already be part of the state’s P-20 Longitudinal Data System as outlined in COMPETES and the U.S. Department of Education SFSF Guidance of April 2009.

Recommendation 2
Upgrade Priority 3: Expansion and Adaptation of Statewide Longitudinal Data Systems from an invitational priority to a competitive priority. Given the Secretary’s emphasis on data systems through the inclusion of the development of data systems as one of the four ARRA assurances, the funding that has been committed through the IES Statewide Longitudinal Data Systems grant program, and acknowledgement that the “development of LDS is intrinsic to state’s ability to move on other 3 reforms” in the recent SFSF indicators and descriptors guidance, the partners of the Data Quality Campaign recommend that the Department upgrade Priority 3: Expansion and Adaptation of Statewide Longitudinal Data Systems from an invitational priority to a competitive priority, whereby states would be awarded additional points or selected based on their ability to meet this criteria.

Recommendation 3
Clarify and differentiate the ways that statewide longitudinal data systems can be expanded. The partners of the DQC actively support the expansion of statewide longitudinal data systems, and recommend that the Department clarifies the description of its Proposed Priority 3 to assist states in their application process. We recognize that there is a need to balance clarity and flexibility, and therefore, recommend the Department group the expansion of statewide longitudinal data system into four, non-mutually exclusive categories that provide states the flexibility to describe how they intend to expand their systems. We suggest the following framing:

1. Expand data systems within agencies to foster alignment among different education programs (intra-agency interoperability). This type of “expansion” provides states with richer information to determine which students are being served by different programs and the impact of those services, and can potentially improve data collection processes by minimizing duplicative collection of the same data for multiple programs.
   a. K-12 data. State K-12 longitudinal data systems should be able to link and connect seamlessly with previously “silicled” K-12 programs such as special education, ELL, CTE, Perkins, etc.
   b. Early childhood data. States currently define the scope of “P” of a P-20 data system differently; under Race to the Top applications, states should be encouraged to expand early childhood data system capacity to link data from early childhood programs that are often administered by a state education agency (e.g., state funded pre-school, Title I preschool, and IDEA Part B 619 and Part C) with the state’s K-12 data system. This expansion should also include establishing linkages with other agencies that store early childhood data (see # 2).

2. Expand data systems’ ability to link information with other critical agencies to enhance service delivery and program evaluation (inter-agency interoperability). State longitudinal data systems can be expanded to link with other critical agencies such as health and human services, child protective services, foster care, corrections, and juvenile justice; and to assist with service delivery and program evaluation. For example:
   
   • While linking early childhood data with K-12 data is identified as an absolute priority in the application, many early childhood programs are administered by both education and health and human services agencies; therefore, the expansion of “early childhood data” should encourage the development (or strengthening) of a state’s ability to link data from programs administered by many agencies.
   
   • Most students do not follow a linear path through the education pipeline, and states should be encouraged to ensure that all students, including adults who are enrolled part-time, taking non-credit courses, or in remedial programs are captured in the statewide longitudinal data system. The ability to track these students is best facilitated by improving existing data systems and ensuring that data from early childhood, K-12, postsecondary and workforce and training systems (e.g., Head Start, state WIA, TANF, corrections and economic development systems, unemployment insurance wage records, etc.) are linked and shared.

3. Expand data systems around management processes to increase operational efficiency. States should be encouraged to strengthen their ability to track and allocate resources to improve operational efficiency. Management data around human resources, finances and processes are vital to efficient and effective management at the state, district and school levels. Through its Race to the Top application, the Department should encourage the collaborative development of process data management systems that are horizontally interoperable (across districts and programs) and vertically interoperable (from districts and states) to reduce duplication and inconsistencies.
4. Expand data systems to foster cross-state data sharing. In a mobile society, states must develop the ability to follow students and teachers across state lines.

The development, adoption, and use of common data definitions and standards are critical to each of the proposed data system expansions. States should be encouraged to build common data standards into all of their plans to ensure vertically and horizontally aligned interoperable systems that will facilitate the sharing of data across program, sector, district and state lines.

Proposed Invitational Priority 4: P-20 Coordination and Vertical Alignment (pg. 37806, columns 1 and 2)
The Department’s Priority 4: P-20 Coordination and Vertical Alignment can be misconstrued as the coordination among state agencies for the development of vertically interoperable P-20 data systems.

Recommendation
Clarify the Purpose of Priority 4: P-20 Coordination and Vertical Alignment. The partners of the DQC recommend that the Department clarify the purpose of Priority 4 to indicate that it is not solely about linking P-20 data systems. Specifically, the Department should indicate that Priority 4 is broadly focused on vertical alignment across P-20 and that linking P-20 data systems is a way to encourage and inform such alignment efforts.

Selection Criteria B: Data Systems to Support Instructions

(B)(1) Fully implementing a statewide longitudinal data system. (pg. 37808, column 3)
The DQC applauds the Department’s efforts to ensure the coordination and alignment of the SFSF assurances and the Race to the Top grant application requirements. States have made tremendous progress over the past three years in building their statewide longitudinal systems, and many states are beginning to use the available data in innovative ways.

Recommendation
In awarding grants, the partners of the DQC recommend that the Department take into consideration not only the extent to which a state has implemented the 12 elements outlined in the America COMPETES Act but also how a state has moved from collecting data to transforming the data into actionable information for use. The Department should not use the 12 elements as merely a checklist of items a state must have prior to considering a state for the Race to the Top grant; rather the Department should assess how the data are being used, (e.g., to provide seamless electronic transcripts from K-12 to postsecondary institutions, to produce feedback reports from postsecondary to high schools and from high schools to middle schools, to align state K-12 and postsecondary standards, etc.).

(B)(2) Assessing and Using State Data (pg. 37809, column 1)
The DQC commends the Department’s focus on ensuring that collected data are provided to key stakeholders to support decision-makers in continuous improvement. However, making data available is a necessary but insufficient condition for ensuring the data will be used to help drive continuous improvement.

Recommendation
The partners of the DQC recommend the Department require states to also provide a plan that:
1. Describes how, and the extent to which, a state intends to provide the relevant data elements to key stakeholders in a user-friendly format. A state should describe the format (e.g., dashboards,
reports, data downloads, etc.) and timelines in which it plans to provide the appropriate level of data to the different stakeholders as well as its communications plans to ensure that stakeholders are aware this information is available.

2. Describe how, and the extent to which, a state will provide training on data use to key stakeholders. A state should describe in its plans the format in which training will be provided (e.g., on-line tutorials, documents, courses, etc.) to key stakeholders.

(B)(3) Using data to improve instruction (pg. 37809, column 1)

The DQC applauds the Department’s focus on ensuring that collected data are provided to teachers and districts in a timely manner to help drive instruction and improvement. However, the partners of the DQC believe that, in addition to making data available, there must also be an equal focus on building the capacity to analyze and use this information. States and districts must work collaboratively to ensure educators are provided the opportunity to develop the capacity to use these data. In addition, the context in which educators are expected to access, analyze and use this data must also be supportive; states should be expected to describe how they can support districts and schools as they make the administrative changes necessary to act on the conclusions identified through data analysis (e.g., teacher-student assignment, curricula, schedules).

Recommendation
The partners of the DQC recommend that the Department require states to provide a plan that describes:

1. How, and the extent to which, a state will provide training on data use, including pre-service training. A state should describe how it intends to provide training to educators (e.g., work with professional development programs/teacher and principal preparation programs, on-line tutorials, etc.);

2. Means by which a state will require educators seeking certification or re-certification to receive training and show competence in the analysis, interpretation, and use of data;

3. The plans by which a state intends to provide the relevant data elements to teachers, principals, and LEAs in a user-friendly format. A state should discuss the format(s) (e.g., dashboards, reports, data downloads, etc.) it plans to use to provide the appropriate level of data to the different stakeholders; and

4. How they will promote an environment in which teachers, principals, and administrators have the support and conditions to make decisions based on the results from the data analysis.

Recommendation
Given that the Department’s definition of “instructional improvement systems” includes “activities such as: instructional planning; gathering information (e.g., through formative assessments […] interim assessments […] and looking at student work)” and “analyzing information with the support of rapid-time reporting,” the partners of the DQC recommend the Department require states to elucidate the state’s and districts’ relative roles in data collection, sharing, and reporting. For example, a state should clearly articulate:

1. The type of data that will be maintained at the district level and provided to buildings and educators through rapid-time reporting;

2. The type of data that will be maintained at the state-level and provided to LEAs and buildings through rapid-time reporting; and

3. Data, such as results on annual state exams that are used for purposes such as high-stakes accountability, where the rapid-time reporting requirement would not be appropriate.
Selection Criteria C: Great Teachers and Leaders

(C)(4) Reporting on the effectiveness of teacher and principal preparation programs (pg. 37809, column 3)

The DQC applauds the Department’s efforts to make data on the effectiveness of the state’s teacher and principal preparation programs publicly available.

Recommendation
The Partners of the DQC recommend that the Department require information regarding teacher and principal effectiveness be provided not only to the public for transparency purposes but also to the teacher preparation or principal preparation program to help the preparation programs modify and improve their program, teaching, and outcomes.

(C)(5) Providing effective support to teachers and principals (pg. 37809, column 3)
The DQC applauds the Department’s efforts to ensure that teachers and principals are provided with the appropriate supports. However, in addition to supports, to be able to effectively change instructional practices and the overall effectiveness of such practices, teachers and principals should have the autonomy to make decisions based on results from the data analysis.

Recommendation
The partners of the DQC recommend that the Department require states to describe in their application how they plan to provide teachers and principals with the autonomy to make decisions based on the results from the data analysis.

Selection Criteria D: Turning around struggling schools

(D)(3) Turning around struggling schools. (pg. 37810, column 1)
The DQC applauds the Department’s focus on turning around struggling schools. Early warning data systems are an important mechanism that can help turn around struggling schools through early identification of students who require additional support.

Recommendation
The partners of the DQC recommend the Department require states to describe in their plan how they will develop, implement, and use an early warning data system to identify and support students who are at-risk of dropping out and/or not graduating from high school college and career ready.

Selection Criteria E: Overall Selection Criteria

(E)(5) – Building strong statewide capacity to implement, scale, and sustain proposed plans (pg. 37810, column 3)
The partners of the DQC commend the Secretary for recognizing the data collection burden and for his attempt to coordinate the Department’s request for data and information “among the various ARRA programs, particularly the State Fiscal Stabilization, Race to the Top, School Improvement Grants, and Statewide Longitudinal Data Systems grant programs.” In most states, there are only a handful of people within each agency who will be tasked with collecting/reporting on these data requests, and the burden of preparing the application for agencies’ with limited staff will be significant. Furthermore, additional burden will be placed on states as a result of receiving this grant due to the increasing demand for data collection and, as more data become available, the demands
to ensure that the data are analyzed and used to inform program and practice.

Recommendation
The partners of the DQC recommend that the Department encourage states to describe in their plan how they will use Race to the Top funds to build state agencies’ capacity to implement, scale, and sustain a state’s proposed plan for meeting the data systems assurance (Priority 1) and data systems expansion and adaptation (Priority 3) with particular focus on the following objectives:
1. Promote cross-sector and cross-agency collaboration;
2. Advance both individual and cross-sector data research and analysis;
3. Help districts interpret and use data to implement change based on the information provided; and
4. Be able to implement change within and across agencies based on the information provided.

Cost / Burden
The partners of the DQC commend the Department for recognizing that “requests for data and information should reflect an integrated and coordinated approach among the various ARRA programs, particularly State Fiscal Stabilization, Race to the Top, School Improvement Grants, and Statewide Longitudinal Data Systems grant programs.” However, states are also asked to collect data on other federal programs, and those collections should be part of a unified strategic data vision.

Recommendation
The partners of the DQC recommend that the Department work to ensure that its requests for data and information reflect an “integrated and coordinated approach” with other federal reporting requirements, e.g., Title I-Part A, IDEA- Part B, IDEA-Part C, Perkins, etc.

Furthermore, given the collaboration that will be required between the state and its participating LEAs to ensure that the state puts forth a “high-quality plan” to meet the various criteria of the grant, nowhere in the cost section of the document is the burden on LEAs described; this burden is significant.

Race to the Top grants will provide states with an opportunity to maximize the power of data to proactively alter policies, programs, and practices to spur improvement at every level—from individual students to the system as a whole. The DQC applauds the Department for its leadership in promoting data as a foundational element of all education reforms. We thank the Department for the opportunity to review this historic grant application and encourage the Department to consider the modifications recommended in this letter in order to strengthen the Race to the Top grant process. The DQC Partners look forward to working in partnership with the Department and the states in the groundbreaking efforts to transform education into a data-informed enterprise.

Sincerely,

Achieve
ACT
Alliance for Excellent Education
American Association of Colleges for Teacher Education
College Summit
Education Commission of the States
Educational Policy Institute
James B. Hunt Institute for Educational Leadership and Policy
Jobs for the Future
Knowledge Alliance
League of Education Voters Foundation
Maine Center for Economic Policy
National Center for Educational Achievement
National Center for Higher Education Management Systems
National Math and Science Initiative
National Staff Development Council
Northwest Evaluation Association
Postsecondary Electronic Standards Council
Pre-K Now, a Campaign of the Pew Center on the States
State Educational Technology Directors Association
State Higher Education Executive Officers Association
Working Poor Families Project
3 Rivers Connect

Attachments

Comment on FR Doc # E9-17909
Social/Behavioral IRB
DATE: December 11, 2012
TO: Dr. Edith Rusch
FROM: Social/Behavioral IRB
RE: Use of Participant Data
Protocol Title: Educational Interest Groups: Influence of Networks on Rulemaking and Policy in Public School Reform
Protocol #: 1211-4320M

The purpose of this letter is to inform you that for those participants who have provided a re-affirmation for the use of their data in this study, it has been determined that the data may be used and analyzed for the purposes of Mr. Brian Myli’s dissertation, but is not otherwise permitted for publication or dissemination.
REFERENCES


Brian Myli

EDUCATIONAL HISTORY

Doctor of Education in Educational Leadership December 2012
Emphasis: K-12 Educational Leadership
University of Nevada, Las Vegas

Master of Arts in Counseling Psychology November 1992
Emphasis: School Counseling
University of Denver

Bachelor of Arts, Cum Laude May 1991
Major: Psychology
Arizona State University

RESEARCH EXPERIENCE

Department of Educational Leadership
University of Nevada, Las Vegas

- Conducted interest group interviews and gathered pertinent information for inclusion in a collective case study entitled: “Education Interest Groups: The Influence of Networks on Rulemaking and Policy in Public School Reform”
- Dissertation defense date: November 13, 2012

TEACHING EXPERIENCE

University of Phoenix – Nevada Campus January 2001 – August 2005
Graduate Department of Educational Counseling

- Taught graduate courses in Educational Counseling including: Career/College Counseling, Professional Portfolio I, Professional Portfolio II

ADMINISTRATIVE EXPERIENCE

Vice President of Leadership and Innovation August 2012 – present
The Public Education Foundation

- Senior Management Team member, manage 8 school district employees, manage school district budget, manage School Climate Improvement initiative, manage City of Las Vegas Grant initiatives, manage Education Incubator Project

Director, Leadership Institute of Nevada May 2012 – present
The Public Education Foundation

- Co-developed, implemented, and delivered inaugural Leadership Summits and Executive Leadership Academy for the Leadership Institute of Nevada
**Director of Leadership and Innovation**  
The Public Education Foundation  
- Senior Management team member, manage the Leadership Institute of Nevada, supervise 8 school district employees, oversee school district budgets, managed Clark County Reads, managed the Scholarship and Grants program, managed the Grants Procurement program

**Coordinator, College Readiness Programs**  
Clark County School District  
- Coordinated more than 50 college counselors district wide, coordinated the Advanced Placement program district wide, coordinated the Advanced Placement Incentive Grant district wide, coordinated the Graduation Advocate program district wide, coordinated the Counselor Connect grant program, coordinated the Dual Credit program district wide, created and updated the annual *Moving On to College and Careers Guide*

**PROFESSIONAL AFFILIATIONS**

**American Education Research Association (AERA)**  
January 2010 – present

**Clark County Association of School Administrators**  
November 2009 – present

**College Board Western Regional Council**  
August 2010 – present

**Nevada ACT Council**  
August 2008 – present

**Nevada Association of School Administrators**  
November 2009 – present