

Responses to Public Comments on the Department's Strategic Plan for Fiscal Years 2011-2014

April 2, 2012

The U.S. Department of Education (Department) provides an update to its Strategic Plan for Fiscal Years 2011-2014 ("Plan"). The Plan was updated based on public comments we received in February, 2012. This Plan sets forth the Department's strategy for improving outcomes for all students and focuses on key outcome-oriented goals aimed at increasing high school graduation, college completion, and educational attainment.

RESPONSE TO PUBLIC COMMENT: We posted a draft Strategic Plan on February 13, 2012 and invited comments from the general public and from key stakeholders. In response to our request, approximately 70 parties submitted comments. The Department made a number of changes to the original Plan based on the comments we received. We explain these changes and provide our responses to substantive issues below. The comments are organized according to the Plan's six goals. Where comments pertain to more than one goal, we provide our responses to comments under the goal that is most relevant. Generally, we do not address technical and other minor changes that are outside the scope of the Plan.

Goal 1: Postsecondary Education, Career and Technical Education, and Adult Education

Comment: Several commenters recommended that the Department increase its focus on supporting students once they graduate from high school including by ensuring that financial aid opportunities enable students from low-income families and non-traditional students to access and afford postsecondary education, whether in a 1-, 2-, or 4-year program. The commenters stated that the Department should also focus on raising the bar on the quality and availability of student aid and ensure that postsecondary and adult education opportunities are accessible and result in people attending college who otherwise would not. Finally, the commenters stated that the Department must work to promote diversity throughout postsecondary education.

Response: The Department is committed to supporting the President's call for "every American to commit to at least one year or more of higher education or career training." The Plan focuses on closing the opportunity gap by improving the affordability of and access to college and workforce training, especially for students from low-income families, first-generation college students, individuals with disabilities, and other chronically underrepresented populations. In particular, the objective of Sub-Goal 1.1 (*Access*) is to "close the opportunity gap by improving the affordability of and access to college and workforce training, especially for low-income students, first-generation college students, individuals with disabilities, and other chronically underrepresented populations." Further, in the introduction to Goal 1 (*Postsecondary Education, Career and Technical Education, and Adult Education*), the indicators of success include increasing the percentage of individuals completing and filing the Free Application for Federal Student Aid form (FAFSA) among both low-income households and non-traditional students (25 years and above with no college degree).

Through enforcement of civil rights statutes and increased civil rights data collection, the Department is ensuring that all students have equitable access to courses and opportunities that lead to postsecondary education.

Changes: No changes necessary.

Comment: Several commenters recommended changes to the Plan that would require legislative changes to implement. For example, one commenter stated that the Higher Education Act (HEA) should be amended to allow students without a high school diploma or General Educational Development (GED) credential to qualify for Pell Grants. Other commenters recommended that certain programs or program elements be continued when current laws are reauthorized. For example, two commenters recommended that “programs of study” be included in the next reauthorization of the Carl D. Perkins Career and Technical Education Act (CTEA).

Response: We appreciate the recommendations. As noted in several places in the Plan (e.g., Sub-Goal 1.3, *Completion*), reauthorization of several key federal education and workforce statutes (i.e., the Elementary and Secondary Education Act (ESEA), the Workforce Investment Act (WIA), the HEA, and the CTEA) are needed to support the implementation of more rigorous postsecondary and adult education reforms aimed at increasing student achievement and success in the workforce and in life.

Changes: No changes necessary.

Comment: In reviewing the Plan, we noted that in addition to increasing degree and certificate completion and job placement in high-need areas, there should also be a focus on high-skilled areas.

Response: We have updated Sub-Goal 1.3 (*Completion*) accordingly.

Changes: The phrase “and high-skilled” has been added to the title of Sub-Goal 1.3 and now reads as follows:

Sub-Goal 1.3: Completion. Increase degree and certificate completion and job placement in high-need and high-skilled areas (especially STEM), particularly among underrepresented and economically disadvantaged populations.

Comment: Several commenters agreed with the Plan’s focus on transforming the teaching profession and the ways in which teachers are recruited and prepared. One commenter suggested that the Department continue to invest in federal programs that strengthen the teacher pipeline, and recommended expanding the Teacher Quality Partnership Grants program. Multiple commenters suggested that the Plan specifically mention the TRIO programs as effectively promoting postsecondary success. Two commenters discussed the key role that career and technical education (CTE) can play in improving the affordability of, and access to, college and workforce training and argued for a greater federal investment in CTE programs.

Response: We appreciate the commenters’ recommendations. However, the purpose of the Plan is not to focus on specific budget requests or on individual programs, of which there are many that would be worthy of mention, but rather to outline the Department’s key outcome-oriented goals for fiscal years 2011 through 2014 and set forth a strategy that focuses on improving outcomes for all students.

Changes: No changes necessary.

Comment: One commenter suggested that the Department expand loan forgiveness programs to cover early childhood educators.

Response: The Public Service Loan Forgiveness program allows early childhood educators to have the remaining balance of their federal student loans forgiven after 120 payments under a qualifying repayment plan while working in a federal, state, or local government entity; a non-profit organization that has been designated as tax-exempt by the Internal Revenue Service (IRS) under Section 501(c)(3) of the Internal Revenue Code (IRC); or a private, non-profit organization (that is not a labor union or a partisan political organization) that provides eligible public services (including early childhood education), while employed. For further information, visit <http://studentaid.ed.gov/PORTALSWebApp/students/english/PSF.jsp>.

Changes: No changes necessary.

Comment: Two commenters stated that CTE data should be better integrated into statewide longitudinal data systems (SLDSs) so that states can track students' progress from secondary to postsecondary education to the workforce. The commenters also stated that data systems must take into account the varied ways that students access postsecondary education and emphasized the need to develop accurate connections across institutions and the workplace in order to ensure programs receive feedback on their students' performance. One commenter recommended that data on adult students be better integrated into SLDSs. Another recommended that the Department encourage states to share data from P-12 longitudinal data systems with personnel preparation programs. Another commenter suggested that the Department provide support to individuals and organizations seeking to access data on student enrollment in postsecondary programs, including students enrolled in out-of-state programs. The commenter stated that currently these data are available only on a cost-per-record basis.

Response: We agree that CTE data and data on adult students should be better integrated into SLDSs. As reflected in Goal 5 (*Continuous Improvement of the U.S. Education System*), the Department is committed to "supporting robust and comprehensive data systems" that provide high-quality data from early learning programs through postsecondary institutions and the workforce. As an example of how we are acting on this commitment, the Department included CTE data elements that states are required to report to the Department in the second version of the Common Education Data Standards (CEDS v2.0). We believe this will make it easier for states to work cooperatively to ensure that all areas of education, including CTE, are completely integrated into SLDSs, the development of which the Department has supported over the past six years.

Further, the Department recently promulgated regulations for the Family Educational Rights and Privacy Act (FERPA) to ensure that SLDSs are implemented in a way that protects the privacy of education records while allowing for the effective use of data. The need for clarity surrounding privacy protections and data security continues to grow as SLDSs are built and more education records are digitized and shared electronically. The amendments to the FERPA regulations also reduce barriers that have inhibited the effective use of SLDSs as envisioned in the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act (the America COMPETES Act) and the American Recovery and Reinvestment Act of 2009 (ARRA) (visit <http://www.gpo.gov/fdsys/pkg/FR-2011-12-02/pdf/2011-30683.pdf> for more information).

Changes: No changes necessary.

Comment: Several commenters suggested that the Plan provide further clarity on the role of part-time students and certificate programs in improving postsecondary attainment. One commenter stated that part-time students would not be able to complete a 2-year degree in three years or a 4-year degree in six years and, therefore, would not be counted positively in postsecondary attainment rates. Another commenter requested that the Plan include a focus on certificate programs that take less than one year but result in nationally recognized industry certification or state or federal licensure.

Response: We agree that both full- and part-time students seeking postsecondary certificates or degrees must be a significant part of the Department's strategy to increase postsecondary attainment; their inclusion aligns with the President's call for every American to commit to at least one year or more of higher education or career training. While certificates are not counted in the educational attainment rate that is commonly used for international comparisons and, thus, are not mentioned in reference to that metric, certificates including those that take less than one year and result in nationally recognized industry certification or state or federal licensure are specifically mentioned throughout the Plan. For example, in the introduction to Goal 1 (*Postsecondary Education, Career and Technical Education, and Adult Education*), the Plan calls for increasing "the number [of students] who complete programs of study with a degree or certificate." The Plan acknowledges in Sub-Goal 1.2 (*Quality*) that an "external risk factor" for meeting this Sub-Goal is that current graduation rate formulas do not account for part-time students or transfer students. The Department, in response to recommendations from

the Committee on Measures of Student Success, an external advisory committee authorized under the Higher Education Act, is considering how the graduation rate might be improved to provide data on part-time students.

Changes: No changes necessary.

Comment: One commenter recommended that the Plan include a statement that all teachers should be trained and supported to teach all students, including high-need students.

Response: We agree that teachers need to be prepared and supported to teach students who come from a variety of backgrounds and who have different learning styles and challenges.

To make this clear, we have added a statement to this effect in the introduction to Sub-Goal 1.2 (*Quality*).

Changes: The phrase, “including students with high needs” has been added to the second paragraph of the introduction to Sub-Goal 1.2 and reads as follows:

We will continue to support teacher preparation initiatives that will further the transformation already underway in how we recruit and prepare teachers in this country to teach all students, including students with high needs.

Comment: One commenter supported the Plan’s focus on strengthening teacher preparation programs and suggested that the Department provide incentives for states to collaborate with one another to identify indicators and assessment procedures for recognizing high-quality teacher preparation programs. Another commenter strongly encouraged the Department to enforce the current statutory requirement for states to report their low-performing teacher preparation programs and for the Department to articulate a process that states must follow in determining which programs are low performing. One commenter recommended that Title IV funding under the HEA be available only to teacher preparation programs that are in good standing in their state. On the other hand, one commenter disagreed with directing Title IV HEA funding only to top-performing preparation programs stating that this action would curtail efforts to improve the entire preparation system and would not help meet the President’s goal of increasing college graduation rates. The commenter stated that the Department’s priority should be to identify low-performing educator preparation programs and improve them, if possible, or close them if they do not improve.

Response: As stated in Sub-Goal 1.2 (*Quality*), the Department is committed to “improving state accountability by implementing effective performance-based funding systems in current programs and through planned reauthorizations.” And, Sub-Goal 1.2 lists the following as an example of an action step the Department will take to improve the quality of postsecondary education: “Provide incentives for institutions and states to publish and make transparent their efforts to increase the quality of their educational programs.” Further, the Department is working through a negotiated rulemaking process to establish indicators of teacher preparation program quality against which states would measure program performance and that they would then use to identify high-and low-quality programs.

Changes: No changes necessary.

Comment: One commenter encouraged the Department to focus support on the lowest-level adult learners – those who read, write, and do basic math at a fifth grade level or below.

Response: The Department is concerned about all adults in the U.S. who are functioning below basic levels of literacy and will continue to devote resources to assist these individuals to improve their literacy and access to higher levels of education and employment. The Department agrees that including a reference to adults who function at the lowest literacy levels is aligned with the mission of the program funded under the Adult Education and Family Literacy Act (AEFLA); therefore, we have added language to the Plan to make this point.

Changes: The following parenthetical has been added to the second “Actions/Means” in Sub-Goal 1.3 (*Completion*): “including those with the lowest reading, writing, and math skills, and lowest levels of English literacy.” The statement now reads as follows:

Fund programs and services that meet the educational needs of adult learners (including those with the lowest reading, writing, and math skills, and lowest levels of English literacy), transitioning workers, and career changers, including immigrant professionals and previously incarcerated individuals;

Comment: Two commenters made recommendations related to increasing the Plan’s focus on improving and promoting excellence in science, technology, engineering, and mathematics (STEM) education. One commenter suggested that the Department provide incentives for states and teacher preparation programs to create content-based, interdisciplinary teacher preparation programs with a focus on STEM.

Response: We agree with the commenters that improving the quality of STEM education is crucial to furthering the economy and spurring innovation. That is why we have already worked with our colleagues across the federal government to establish a goal of producing 1 million well-prepared graduates with STEM degrees within the next decade. We believe it is important for the Plan to include this goal and have updated Sub-Goal 1.3 (*Completion*), accordingly. We have also added this goal to the “Agency 2012-13 Priority Goals.” As noted in the Plan, priority goals will be a particular focus over the next two years and our progress in meeting them will be a measure of the success of the Department’s cradle-to-career education strategy. (Further information on the priority goals can be found on performance.gov).

Changes: We have made the following changes:

The following has been added to Sub-Goal 1.3 as an example of an action the Department will take:

Collaborate with other federal agencies to improve the quality of STEM education at all levels to help increase the number of well-prepared graduates with STEM degrees by one-third over the next 10 years, resulting in an additional 1 million graduates with degrees in STEM subjects.

The table listing the Agency FY 2012-13 Priority Goals in the section of the Plan on “*Linking Department Performance to National Outcomes*” has been updated to include the following:

Improve the quality of science, technology, engineering, and math (STEM) education

Over the next 10 years, increase the number of well-prepared graduates with STEM degrees by one-third, resulting in an additional 1 million graduates with degrees in STEM subjects.

Goal 2: Elementary and Secondary

Comment: One commenter requested that the Plan promote world languages as an important part of a high school curriculum.

Response: The Department strongly believes in the importance of ensuring that all students are prepared for college and a career. As part of that goal, it is important that students have the skills necessary to succeed in the 21st century, which can include having students acquire the language skills necessary to interact with individuals from foreign countries. That is why in *A Blueprint for Reform* (ESEA Blueprint), our plan for reauthorizing the ESEA, we proposed to create “Effective Teaching and Learning for a Well-Rounded Education”—a program that would provide competitive funds to ensure students have access to a complete education that includes foreign language and other subjects such as art, history, and financial literacy.

We agree that language regarding the importance of a well-rounded education should be included in the Plan and have modified the Plan accordingly.

Changes: The following language has been added to the second paragraph of the introduction to Goal 2 (*Elementary and Secondary*):

Ensuring that our students have the critical-thinking skills and other tools to be effective in the 21st century economy means improving teaching and learning in all content areas—from literacy to science, technology, engineering, and mathematics to history, civics and government, geography, foreign languages, the arts, economics and financial literacy, environmental education, health education, and other subjects.

Comment: One commenter suggested that the Department change references to “college and career” in the Plan to “college and/or career.”

Response: The Plan, specifically Sub-Goal 2.1 (*Standards and Assessments*), focuses on college- and career-ready standards and assessments because the Department believes that all students should graduate from high school with the knowledge and skills they need to be prepared for both college and a career. Nearly 8 in 10 future job openings in the next decade in the U.S. will require some workforce training or postsecondary education. Additionally, research shows that whether preparing for college or career, high school graduates need to have the foundational skills to enable them to learn additional academic and job-specific skills, both at the entry level and throughout their careers. Therefore, we believe the Plan’s references to “college and career” are appropriate.

Changes: No changes necessary.

Comment: One commenter suggested that the Plan provide greater clarity on the appropriateness of using student achievement test scores as the primary metric in evaluating teachers’ effectiveness.

Response: At various points in the Plan, we state that the Department intends to help improve the quality of teaching and learning in America’s schools by supporting efforts to increase the number of districts with comprehensive teacher and principal evaluation and support systems based on student growth in significant part, as well as other measures. For example, in the introduction to Sub-Goal 2.2 (*Great Teachers and Leaders*), we state that “The Department will help strengthen the profession by supporting efforts that focus on actionable feedback, support, and incentives at every stage of a career, based on fair evaluation systems that look at multiple measures, including student growth.”

Changes: No changes necessary.

Comment: One commenter recommended that the Department invest in the development and implementation of, and encourage states to develop and implement, valid and reliable performance assessments that measure teacher candidates’ readiness to teach, including their classroom management skills, ability to work with diverse learners, and demonstrated ability to improve student achievement.

Response: The Department supports state-led efforts to implement performance-based teacher licensure and certification requirements. As stated in the examples of the actions the Department will take under Sub-Goal 2.2 (*Great Teachers and Leaders*), the Department is committed to supporting “high-quality preparation programs that prepare educators to teach and lead in high-need schools and in shortage areas, such as special education and teaching of English Learners, and require these programs to track and report on the effectiveness of their graduates.”

Changes: No changes necessary.

Comment: One commenter recommended that the Plan better reflect the Department’s commitment to encouraging and fostering public/private partnerships through grant competitions and policy priorities.

Response: The Department agrees that partnerships between public and private entities are critical in supporting innovation and continuous improvement of the nation's education system, and the Plan encourages such partnerships. For example, a specific example of an action the Department will take to achieve Sub-Goal 2.3 (*School Climate and Community*) is to "Provide incentives for programs to establish partnerships with families and parent organizations, faith- and community-based organizations, institutions of higher education, or other federal, state, and local entities." In addition, Goal 5 (*Continuous Improvement of the U.S. Education System*) focuses on collaboration among stakeholders and across sectors.

Changes: No changes necessary.

Comment: One commenter recommended including family engagement as a Sub-Goal in support of Goal 2 (*Elementary and Secondary*). Another commenter recommended that the Plan reflect the important role of parent engagement in turning around severely underperforming and struggling schools.

Response: The Department agrees that engaging families in education is critical to improving outcomes for all students, especially in relation to turning around persistently low-achieving schools, and believes that we have made this clear in Goal 2. For example, the introduction to Sub-Goal 2.3 (*School Climate and Community*) acknowledges that "Preparing students for success is made easier...with families who are actively engaged in their children's academic life." Further, Sub-Goal 2.3 outlines the Department's commitment to "Support community-wide approaches and increase the capacity of community-based and other organizations to increase success for children from the cradle through college to career." The Plan also describes the need for family involvement and the Department's commitment to encouraging "opportunities for families to engage actively and meaningfully in their children's education" as an action step in Sub-Goal 2.3. Finally, Sub-Goal 2.4 (*Struggling Schools*) emphasizes family and community engagement as an effective turnaround strategy.

Changes: No changes necessary.

Comment: One commenter suggested that the Department add a new goal that focuses on expanding learning opportunities and helping communities provide better, more comprehensive services to students and families through partnerships with providers. Multiple commenters suggested that the Department specifically mention the 21st Century Community Learning Centers (CCLC) program as effectively promoting college- and career-readiness.

Response: Sub-Goal 2.3 (*School Climate and Community*) addresses the Department's support of community-wide approaches to providing comprehensive educational supports, including expanded learning time. The Department strongly supports expanding the school day and year, and the Plan acknowledges that community-based organizations are valuable resources in this effort. For example, the Plan includes the following as an indicator of success for Goal 2 (*Elementary and Secondary*): "Increase in the percentage of schools implementing initiatives that increase time for learning during or outside the school day." In addition, the Plan provides the following as specific examples of actions the Department will take: "Fund communities ...to comprehensively redesign and expand the school day or year to increase time for academics and enrichment activities..."(Sub-Goal 2.3) and "Fund and encourage states and districts to increase their capacity, including through partnerships with local employers and industry groups, faith-based and community-based organizations, postsecondary institutions, and other state and local entities, to turn around their persistently lowest-achieving schools" (Sub-Goal 2.4, *Struggling Schools*).

With regard to the comments on the 21st CCLC program, the purpose of the Plan is not to focus on individual programs, of which there are many that would be worthy of mention, but rather to describe the Department's overall strategy of helping to improve student achievement and prepare our students to compete in the global economy.

Changes: No changes necessary.

Comment: Two commenters agreed with the Plan's focus on creating positive conditions for learning, including by supporting the provision of positive behavioral interventions and supports, but suggested that the Plan provide more emphasis on the important role that specialized instructional support personnel who provide emotional, social, behavioral, and mental health supports can have in facilitating systems-level change, including multi-tiered systems of support and school climate change.

Response: The Department agrees that specialized instructional support personnel have a critical role to play in facilitating systems-level change, including by improving school climate and implementing multi-tiered systems of support and we have added language to make this clear.

In addition, we note that Sub-Goal 2.3 (*School Climate and Community*) references positive behavioral supports as an example of a multi-tiered system of support that schools can use to improve conditions for learning

Changes: The following language has been added to the first sentence in the third paragraph in Sub-Goal 2.3: "...that include, as appropriate, the services provided by specialized instructional support personnel." The sentence now reads as follows:

In high-poverty neighborhoods, the Department will support community-wide approaches that address interrelated barriers to learning and provide comprehensive supports for students and their families that include, as appropriate, the services provided by specialized instructional support personnel.

Comment: One commenter stated that a more holistic view of student achievement should include other essential components of a student's life, such as economic status, emotional well-being, and cultural/linguistic background. The commenter recommended that all the goals in the Plan be structured around these dimensions.

Response: We chose to structure the Plan around six strategic goals that could be used to guide the day-to-day work of the Department's staff in order to accomplish the President's goal of the U.S. once again having the world's highest proportion of college graduates in the world by 2020. We acknowledge that many factors, such as those listed by the commenter, can affect a student's achievement and that too many students face barriers to learning. However, we also know that students can succeed despite being born into the most difficult of circumstances. That is why the Plan outlines in Sub-Goal 2.3 (*School Climate and Community*) how the Department will support community-wide approaches that address inter-related barriers to learning and provide comprehensive supports for students and their families – building a continuum of academic programs and family and community supports from cradle through college to career, with strong schools at the center.

Changes: No changes necessary.

Comment: One commenter requested that the Plan provide an additional focus on experiential learning activities outside of the school day.

Response: The Department agrees that it is important for the community to engage students through hands-on, experiential learning opportunities. As stated in our ESEA Blueprint, the Department is committed to improving student achievement by supporting "in school and out of school strategies that provide students and, where appropriate, teachers and family members, with additional time and supports to succeed." The Plan has been updated to reference "experiential learning."

Changes: The following phrase has been added to the first action under Sub-Goal 2.3 (*School Climate and Community*): "which may include opportunities for experiential learning, as well as". The action now reads as follows:

Fund communities to provide comprehensive supports through full-service school models and to comprehensively redesign and expand the school day or year to increase time for academics and

enrichment activities, which may include opportunities for experiential learning, as well as time for teachers to collaborate and to develop and enhance their skills.

Comment: One commenter suggested that the Department refrain from establishing mandates that would require state educational agencies (SEAs) or local educational agencies (LEAs) to redirect resources, instead of allowing these decisions to be made at the local level.

Response: The Department agrees that SEAs and LEAs are generally best positioned to make decisions on how to improve educational outcomes for students. By focusing on key outcome measures, the Plan emphasizes the goals, rather than the means, that SEAs and LEAs use to achieve those goals.

Changes: No changes necessary.

Comment: One commenter recommended that the Plan acknowledge the impact that family literacy and parental engagement have in assisting both parents and their children in becoming literate, succeeding in school, and gaining employment.

Response: The Department agrees and is committed to promoting family literacy and parental engagement. As noted in the Secretary's Message, we intend to "provide teachers, administrators, and families with information on how young children are learning and how early learning programs can be strengthened, especially through family literacy programs." The Secretary also calls for "an 'all-hands-on-deck' approach in communities across America—involving local leaders, educators, families, and the students themselves—to build the best-educated workforce and citizenry in the world."

Changes: No changes necessary.

Goal 3: Early Learning

Comment: Several commenters recommended ways to increase funding to improve the quality of early learning programs and services. For example, one commenter suggested that the Plan encourage states, local agencies, and schools to use funds under Title I of the ESEA to serve children younger than kindergarten. Another commenter recommended changes to the Department's 2013 budget request. One commenter recommended that discretionary grant competitions be designed to support early learning programs and services.

Response: We appreciate the commenters' recommendations. However, the purpose of the Plan is not to focus on specific budgets or individual programs, of which there are many that would be worthy of mention, but rather to outline the Department's key outcome-oriented goals for FY 2011 through 2014 and set forth a strategy that focuses on improving outcomes for all groups of students. We note, however, with regard to the suggestion that the Department encourage states, local agencies, and schools to use Title I funds to serve young children, that we will soon be releasing non-regulatory guidance for state and local education agencies on the use of Title I funds to serve young children. The non-regulatory guidance document will be available on the Department's Web site in the near future.

Changes: No changes necessary.

Comment: One commenter suggested that the Plan include additional citations that support the need for high-quality early learning experiences for all children.

Response: We agree and have included additional citations that readers of the Plan may find helpful. We also believe it is important to note the important role of brain development in early childhood and have added a statement to that effect in the introduction to Goal 3, along with corresponding references:

Changes: We have made the following changes to Goal 3 (*Early Learning*):

We have added the following phrase (along with corresponding references) to the first paragraph of the introduction to Goal 3: “The years from birth through age eight are the most critical for brain development, and significant evidence from research and evaluation demonstrate that...” The first paragraph of the introduction to Goal 3 now reads as follows:

The years from birth through age eight are the most critical for brain development, and significant evidence from research and evaluation demonstrate that participation in high-quality early learning programs will lead to both short- and long-term positive outcomes for all children, especially those with high needs, including increased school readiness and success and improved high school graduation and college attendance and completion.

We have added the following reference citations to the introduction to Goal 3:

Bowman, B. T., Donovan, M. S., & Burns, S. (Eds.). *Eager to Learn: Educating Our Preschoolers*. Washington, DC: National Academy Press, 2001.

Shonkoff, J. P., & Phillips, D. A. (Eds.). *From Neurons to Neighborhoods: The Science of Early Childhood Development*. Washington, DC: National Academy Press, 2001.

Pianta, R., Barnett, S., Burchinal, M., & Thornberg, K. The Effects of Preschool Education: What We Know, How Public Policy Is or Is Not Aligned With the Evidence Base, and What We Need to Know. *Psychological Science in the Public Interest*, 10, 49-88, 2009.

Comment: One commenter, who was pleased that the Department included a goal focused on early learning, was concerned that the Plan did not emphasize the importance of parenting, parent education programs, and parent involvement in their child’s education.

Response: We agree that parent education and family engagement in their child’s education is critical. As noted in the introduction to Sub-Goal 3.3 (*Accountability*), we want to make sure that information is provided to families and the public about the quality of early learning programs so that families can make informed decisions. That said, we appreciate the commenter’s concern that the Plan does not emphasize the importance of parenting, parent education programs, and parent involvement in their child’s education; therefore, we have added language to Goal 3 (*Early Learning*) to make that point.

Changes: The following sentence has been added to the second paragraph of the introduction to Goal 3 (*Early Learning*):

And, to achieve successful outcomes for young children it is critical to gain the support of families and ensure that family engagement and education activities are of high quality and integrated into early learning programs

Comment: One commenter recommended that the Department award Race to the Top – Early Learning Challenge (RTT-ELC) grants to states that propose a high-quality plan to implement effective interventions for all students, including children with disabilities and English Learners, that are delivered, monitored, and evaluated by qualified professionals.

Response: We appreciate the commenter’s recommendation and strongly agree that early learning programs should be staffed by qualified professionals and available to all children, including children with disabilities and English Learners. Our commitment to ensuring that availability is described in the introduction to Goal 3 (*Early Learning*), where we state that, “Early learning programs must meet the needs of all children, including children with disabilities and English Learners.” We believe that the Plan would be strengthened by acknowledging the

importance of high-quality, coordinated early learning systems, consistent with the RTT-ELC program. Accordingly, we have made the appropriate changes in the introduction to Goal 3.

Changes: We have made the following changes to Goal 3:

The following statement has been added to the fourth paragraph of the introduction to Goal 3:

A high-quality, coordinated early learning system includes program standards, comprehensive assessment systems, workforce and professional development, family and community engagement, health promotion, and data systems.

We have added the phrase, “that increase access to high-quality programs” and made corresponding changes to the first sentence in the sixth paragraph in the introduction to Goal 3. The paragraph now reads as follows:

To enhance the quality of these programs and services and improve outcomes for children from birth through 3rd grade, including children with disabilities and those who are English Learners, the Department will promote initiatives that increase access to high-quality programs, improve the early learning workforce, build the capacity of states and programs to develop and implement comprehensive early learning assessment systems, and ensure program effectiveness and accountability.

Comment: One commenter recommended that the Plan describe the connections between early learning and the K-12 system.

Response: The connections between early learning and K-12 are described in Goal 3 (*Early Learning*). Specifically, the introduction to Goal 3 states that “Only by coordinating the patchwork of early learning programs and services, and better integrating them with the elementary and secondary education system, can an integrated early learning system be built that improves health, social-emotional, and cognitive outcomes for children from birth through 3rd grade.”

Changes: No changes necessary.

Comment: One commenter applauded the Department for increasing our focus on early learning, but expressed concern that the Plan does not emphasize full-day kindergarten. The commenter stated that full-day kindergarten is a vital link that ties together equity in educational opportunities, early learning, and elementary and secondary education and provided a number of recommendations to amend the Plan to include a focus on full-day kindergarten.

Response: One of the ways the Plan proposes to achieve the overall goal of improving the health, social-emotional, and cognitive outcomes for all children is to “increase access to high-quality early learning programs and comprehensive services, especially for children with high needs” (Sub-Goal 3.1, *Access*). Given the variety of early learning programs available, the Plan does not emphasize one type of program (e.g., full-day kindergarten) over another; rather, the Plan focuses on improving the quality of all early learning programs and also, on increasing the number of children with high needs from birth through kindergarten entry who are in high-quality early learning programs.

Changes: No changes necessary.

Comment: One commenter urged the Department to continue to collaborate closely with the U.S. Department of Health and Human Services (HHS) on creating high-quality early learning experiences.

Response: The Department is committed to continuing to work closely with HHS to improve the quality of early learning programs and services. Coordination and collaboration with HHS are critical to helping states build an integrated early learning system from the “patchwork” of early learning programs and services that currently

exist. We note that the Plan already includes a specific example of an action the Department will take with HHS to help improve the quality and effectiveness of the early learning workforce. Specifically, the Plan includes, under Sub-Goal 3.2 (*Workforce*), “With the Department of Health and Human Services (HHS), develop a coordinated, evidence-based plan for current and future technical assistance and professional development investments.” This effort will build on the work that the Department and HHS are already engaged in to jointly administer and support the nine winning RTT-ELC states as they improve their systems of early learning.

Changes: No changes necessary.

Comment: One commenter recommended encouraging states, local agencies, and schools to provide professional development opportunities that bring together staff from schools and community-based early learning programs, as well as teachers in kindergarten and first grade.

Response: We agree. Under Sub-Goal 3.2 (*Workforce*), we note that the Department can play an important role in encouraging states and school districts to focus components of K-3 professional development on “joint professional development opportunities for K-3 and preschool teachers, including professionals from community-based early learning programs.” The Department will soon be releasing non-regulatory guidance for state and local educational agencies on the use of Title I funds to serve preschool children. In the non-regulatory guidance we will clarify how Title I funds may be used to provide joint professional development. This non-regulatory guidance will be available on the Department’s Web site.

Changes: No changes necessary.

Comment: One commenter recommended that the Plan clearly state the need for specialized early childhood professional preparation and certification for teachers of children birth through age eight.

Response: Teacher certification is the responsibility of state and local governments. However, the Department recognizes the need for specialized professional preparation for teachers of children birth through age eight. In Sub-Goal 3.2 (*Workforce*), we state that “The federal government can address these workforce challenges by supporting more robust teacher preparation and professional development efforts and promoting common, statewide workforce knowledge and competency frameworks designed to support children’s learning and development and improve outcomes.” We also note that the RTT-ELC grant program supports states in developing a common, statewide progression of credentials and degrees aligned with the state’s workforce knowledge and competency framework.

Changes: No changes necessary.

Comment: One commenter recommended adding an indicator measuring the number of states that use the definitions and codes in the Common Data Standards, which include a common definition of “kindergarten.” This commenter also recommended adding an action to Sub-Goal 3.3 (*Assessment and Accountability*) to promote the use of Common Data Standards.

Response: Sub-Goal 5.1 (*Data Systems*) is focused on assisting states in developing longitudinal data systems capable of sharing key data elements across the P-20 education continuum. Specifically, Sub-Goal 5.1 includes the following example of an action the Department will take “Collaborate with states, districts, and other education data stakeholders to develop, for voluntary adoption, common data standards that will include common data definitions and technical specifications.” Further, once states have the infrastructure in place to adopt the Common Data Standards, the Department will work to develop appropriate metrics related to states’ adoption.

Changes: No changes necessary.

Goal 4: Equity

Comment: Several commenters requested that the Department address “identity-based bullying and harassment” and explicitly mentioned the need to address the bullying and harassment of lesbian, gay, bisexual, transgender, and questioning (LGBTQ) youth. Commenters also asked that sexual orientation and gender identity be mentioned in the Plan. One commenter asked that the Department harmonize its approach to bullying and harassment with the need to reduce unnecessary exclusionary discipline. Another comment asked that priorities of the Office of Safe and Healthy Students be highlighted.

Response: The Department is committed to addressing the national issue related to the bullying and harassment of individuals, including those who are, or are perceived as, LGBTQ. Specifically, as mentioned in the introduction to Goal 4 (*Equity*), the Department is committed to ensuring that “all students are free from bullying or harassment.” The Department recently issued a policy letter on the recognition of student-led non-curricular clubs (which may include gay-straight alliances) under the Equal Access Act, and hosted and participated in events highlighting the needs of LGBTQ youth. The Department has also issued guidance to explain that gender-based harassment and sex-stereotyping are forms of sex discrimination that are covered under Title IX of the Education Amendments of 1972, in addition to other forms of sex discrimination. The Department is committed to promoting effective educational opportunities for all students, including those who are LGBTQ. Therefore, we have changed the title to Goal 4 and the list of enumerated characteristics that is included in the introduction to Goal 4 to reference “sexual orientation” and “gender identity.” Further, as “gender-based harassment and sex-stereotyping” are forms of sex discrimination that are covered by civil rights laws, we have updated the Plan accordingly.

With regard to the comment requesting that priorities of the Office of Safe and Healthy Students be highlighted, the Department notes that Sub-Goal 2.3 (*School Climate and Community*) focuses on increasing the success, safety, and health of students and reflects many of the priorities of the Department’s Office of Safe and Healthy Students. The Department agrees that promoting safe and healthy learning environments for students should be further highlighted in the Plan, and that this is a part of the goal of increasing educational opportunities for all students. In response, we have added a reference to safe and healthy learning environments in the title of and introduction to Goal 4.

Changes: Consistent with the response to comments above, we have made the following changes in Goal 4:

The title of Goal 4, (which is listed several times in the document and similarly updated) reads as follows:

GOAL 4: EQUITY. Ensure and promote effective educational opportunities and safe and healthy learning environments for all students regardless of race, ethnicity, national origin, age, sex, sexual orientation, gender identity, disability, language, and socioeconomic status.

The third sentence in the first paragraph of the introduction to Goal 4 has been revised to read as follows:

Yet, far too often, the quality of a child’s education and learning environment, and opportunities to succeed are determined by his or her race, ethnicity, national origin, age, sex, sexual orientation, gender identity, disability, language, socioeconomic status, or ZIP code.

The second sentence in the first paragraph of Sub-Goal 4.2 (*Civil Rights Enforcement*) has been revised to read as follows:

The Office for Civil Rights (OCR) is charged with the vitally important task of ensuring that recipients of federal funds comply with the federal civil rights laws and that beneficiaries, including students participating in education programs offered by federally funded schools and colleges, are free from discrimination on the basis of race, color, national origin, sex (including gender-based harassment and sex-stereotyping), disability, or age.

Comment: One commenter asked that the Department take a number of steps to advance gender equity and access of girls and women to schools, colleges, workforce training programs, and STEM careers. The commenter also asked that the Department release guidance related to accommodations for pregnant and parenting students and single-sex programs.

Response: As stated in the introduction to Goal 4 (*Equity*), the Department is committed to working to change the current state of affairs where, “far too often, the quality of a child’s education and the opportunities they have to succeed are determined by his or her... sex...” The Department has worked to clarify the requirements applicable to educational programs receiving federal financial assistance regarding the prevention and redressing of sexual harassment and sexual violence. We have also worked to encourage underrepresented groups such as women to pursue STEM careers, for example by including such a focus in the Department’s Supplemental Priorities, which are used in the Department’s competitive grant programs (see <http://www2.ed.gov/legislation/FedRegister/other/2010-4/121510b.html>). The Department is considering what additional guidance would be helpful to ensure that equal educational opportunities are provided to all students, regardless of gender.

We agree that the Plan would be strengthened by adding information about the number of women earning degrees in STEM careers, as well as a specific example of an action the Department will take to ensure that equal educational opportunities are provided to all students.

Changes: We have made the following changes in Goal 4:

The following sentence and accompanying reference have been added to the list in the first paragraph in the introduction to Goal 4:

In 2008-2009, women earned less than one in five bachelor's degrees in engineering, and less than one in eight bachelor's degrees in computer science. (U.S. Department of Education, NCES, 2008–09 IPEDS.)

The following has been added to Sub-Goal 4.1 (*Continue to Increase the Infusion of Equity throughout the Department’s Programs and Activities*) as an example of the actions the Department will take:

Monitor and ensure equity and access of girls and women to critical programs and career pathways through the Civil Rights Data Collection and other data disaggregated by sex that is already required by other specific education- and workforce-related programs.

Comment: Several commenters recommended that the Plan include specific strategies or programs and evaluate the efficacy of such strategies and programs on meeting the needs of all students (including such populations of students as English Learners, minorities and students from low-income families, and students with disabilities). For example, commenters suggested that the Plan examine the impact of high-stakes testing; high-quality assessments for English Learners; early warning systems that track participation and outcomes for at-risk youth; greater guidance resources; magnet schools; improving graduation rates; expanded curricula; dropout recovery and wraparound systems; teacher training; growth models and evaluation systems sensitive to progress of all learners; expanded focus on dimensions of student development; the services provided by mental health professionals and specialized instructional support personnel; effective models for turning around low-performing schools; and alignment of the Plan’s student subgroups in the Equity section with student achievement subgroup categories. Further, commenters asked for greater IDEA funding and alignment of the IDEA with the ESEA.

Response: We appreciate the commenters’ suggestions and note that while some of these strategies and programs are included in the Plan as illustrative of the Department’s work and plans moving forward, the purpose of the Plan is not to focus on specific budgets or individual programs, of which there are many that would be worthy of mention in these areas, but rather to outline the Department’s key outcome-oriented goals for fiscal years 2011 through 2014 and set forth a strategy that focuses on improving outcomes for all students. As stated in the section on *Agency FY 2012-13 Priority Goals*, “the effective implementation of the Department’s

priority and strategic goals will depend, in part, on the effective use of high-quality and timely data, including evaluations and performance measures, throughout the lifecycle of policies and programs.” The Department is committed to expanding evidence-based approaches and supporting effective strategies that will improve learning outcomes for all students across the spectrum of early childhood, K-12, and postsecondary education (including adult education). Such strategies include fostering a culture of innovation (e.g., through the groundbreaking Investing in Innovation (i3) program), identifying effective practices (e.g., through its independent research arm, the Institute of Education Sciences), and creating incentives for the scaling up effective strategies (e.g., through grants to expand charter and magnet schools; improvements in suspension and expulsion practices; development of next-generation assessments and assessment strategies). The strategies also include a focus on identifying, evaluating, and scaling up practices aimed at turning around persistently low-achieving schools and dramatically increasing outcomes in high schools, ensuring that all students graduate with the skills and abilities necessary for success in college and career. All of these strategies, including those designed to ensure equitable access to effective teachers and other school personnel and comparable resources, must be used together to eliminate the achievement gap.

Through enforcement of civil rights laws, the Department ensures that all students in a community (including English Learners, students with disabilities, minority students, and students from low-income families) have equitable access to all educational resources – including challenging coursework, and effective teachers and other personnel – and do not experience bullying, harassment, or other forms of discrimination that hinder their achievement. We believe that the Plan would be strengthened by clarifying that the Department will continue its commitment to infusing equity principles throughout our programs and activities by systematically tracking the progress made within key priorities and initiatives to foster greater educational equity among students. Accordingly, we have added language to the introduction to Goal 4 (*Equity*) to make this clear.

Changes: We have made the following changes to the introduction to Goal 4:

We have added the following language to the third paragraph in the introduction to Goal 4:

The Department will systematically track the progress made within key priorities and initiatives across the agency toward fostering greater educational equity among students. Many of these activities are well under way. For example,

The beginning of the third paragraph in the introduction to Goal 4 now reads as follows:

The Department will systemically track the progress made within key priorities and initiatives across the agency toward fostering greater educational equity among students. Many of these activities are well under way. For example, the Department is working to provide a greater focus on equity throughout its comprehensive reform initiatives, incorporating the concept of shared responsibility and accountability to meet the needs of students, families, and educators.

Comment: Several commenters recommended that the Department further elaborate on issues pertaining to racial segregation and specifically highlight our recent guidance on use of race in fostering diversity in K-12 and higher education.

Commenters specifically asked that the Department's Office for Civil Rights (OCR) address the disproportionately low numbers of minority students in gifted education, clarify our procedures, release new guidance, focus more specifically on excessive and exclusionary discipline practices, and enhance coordination among OCR regional offices and other stakeholders.

Response: The Department agrees that fostering diversity in all educational settings and reducing racial isolation in K-12 settings is a compelling national interest and that language on this issue warrants inclusion in the Plan. As stated in the introduction to Goal 4 (*Equity*), “Equity is addressed in priorities that include awarding competitive grants; reauthorizing statutes designed to increase equity, including ESEA; improving the affordability of postsecondary education; ensuring a safe learning environment where students are free from

bullying and harassment; ensuring the equitable distribution of effective teachers and resources in low-performing, high-poverty, and high-minority schools; increasing traditionally underrepresented students' access to college- and career-ready curricula such as STEM classes, advanced placement, and other high-level courses; and increasing access to high-quality early learning programs for high-needs children." Further, in Sub-Goal 4.1 (*Continue to Increase the Infusion of Equity throughout the Department's Programs and Activities*), we state that equity is infused in the priorities for discretionary grants, including "Encouraging diversity initiatives to promote cross-racial understanding, break down racial stereotypes, and prepare students for an increasingly diverse workforce and society."

The Department also agrees that significant racial disparities in discipline and the exclusion of minority students from advanced, college- and career-ready coursework are substantial concerns that must be investigated and addressed. Through the release of a transformed Civil Rights Data Collection, issuance of policy guidance, or the initiation and resolution of targeted enforcement efforts, OCR and its regional offices have comprehensively addressed the disproportionately low numbers of students enrolled in gifted and talented education programs and advanced math and science courses that make students ready for college, and in Advanced Placement (AP) courses that can give students a head start at college; disparate discipline rates that lead to the exclusion of students from education; and racial and socioeconomic isolation in schools and universities. The Department will continue to explore ways to improve communication and coordination with stakeholders, and will continue to release policy guidance, conduct investigations, and highlight data that address issues of excessive school discipline and other violations of Title VI and other civil rights statutes. This commitment is highlighted in multiple places in Goal 4, including in the introduction to Sub-Goal 4.1 (*Continue to Increase the Infusion of Equity throughout the Department's Programs and Activities*), where we state that the Department is "working to ensure students are safe in school, free from bullying and harassment, and not subject to disparate discipline." Further, in Sub-Goal 4.2 (*Civil Rights Enforcement*), we state that the Department is using an integrated approach to civil rights enforcement to address "racial disparities in school discipline."

Changes: No changes necessary.

Comment: Several commenters asked the Department to designate a lead person or office to address mental health issues among students, and that OCR aggressively pursue complaints regarding students with mental health needs.

Response: As stated in the introduction to Goal 4 (*Equity*), "the Department is working to provide a greater focus on equity throughout its comprehensive reform initiatives." The education of students with disabilities, including students with mental health needs, is an issue that involves all components of the Department and cannot be led by a single office.

Changes: No changes necessary.

Comment: Several commenters made recommendations related to instructional supports and techniques for students, especially students with disabilities. Specifically, commenters asked that the Department highlight the importance of pupil and related services professionals and other specialized instructional support personnel who assist students with disabilities, among other students. In addition, commenters asked that the Department highlight and address the importance of Universal Design for Learning (UDL) and Positive Behavioral Intervention and Support (PBIS), especially for children with significant needs.

Response: Ensuring an appropriate education for each child with a disability in the most inclusive setting appropriate is a longstanding goal of the Department, as reflected in our administration of the Individuals with Disabilities Education Act and Section 504 of the Rehabilitation Act. This commitment is embodied in the actions under Sub-Goal 4.1 of the Plan (*Continue to Increase the Infusion of Equity throughout the Department's*

Programs and Activities), where we commit to “Support *Individuals with Disabilities Education Act* (IDEA) programs to increase access to high-quality, inclusive programs and services for students with disabilities.”

With regard to the request that the Plan highlight the importance of related services professionals and other specialized instructional support personnel, we agree that these personnel have a critical role to play in supporting all students, including students with disabilities. In response to a comment made on Sub-Goal 2.3 (*School Climate and Community*), we have added language to make that clear (see response to comments in Goal 2, *Elementary and Secondary*). We also note that PBIS is specifically referenced in Sub-Goal 2.3 (*School Climate and Community*), but agree that it would be helpful for the Plan to reference UDL. Therefore, we have revised the introduction to Sub-Goal 4.1 (*Continue to Increase the Infusion of Equity throughout the Department’s Programs and Activities*) to include language consistent with our ESEA Blueprint.

Changes: The following has been added to the end of the fourth paragraph in the introduction to Sub-Goal 4.1:

Further, it seeks to ensure that teachers and leaders are better prepared to meet the needs of diverse learners by encouraging more districts and schools to implement high-quality, state- and locally determined curricula and instructional supports that incorporate the principles of universal design for learning to meet all students’ needs.

Goal 5: Continuous Improvement of the U.S. Education System

Comment: One commenter suggested that the Department examine its current data collection systems in order to reduce redundancy.

Response: The Department agrees that it is important to reduce redundancy in our data collections and administrative requirements. Information on the Department’s ongoing efforts in this area can be found at <http://www2.ed.gov/policy/gen/reg/retrospective-analysis/index.html>. Given the importance that the Department places on reducing burden, we believe it is important for the Plan to include a specific reference to reducing redundancy in the data that the Department collects, and have made this change to the Plan.

Changes: The following has been added to the second paragraph of the introduction to Sub-Goal 5.1 (*Data Systems*):

Further, the Department will continue to use the information collection clearance process to gather and respond to comments from the public in advance of beginning any new data collection, and to revise and refine existing data collections to reduce and remove redundant items.

Comment: Several commenters recommended that the Department foster improved longitudinal data systems, as well as the disaggregation of data by gender and additional ethnic subgroups. One commenter asked that the Department expand the Civil Rights Data Collection in its scope and frequency of collection. Another commenter requested that school climate data be published in a manner that is accessible and not counterproductive.

Response: The Department strongly agrees that the availability of improved education and workforce data and data systems will support efforts to achieve better outcomes for students from cradle through career and is committed to working with Congress and other stakeholders to expand the quality, type, and availability of these data. As stated in Goal 5 (*Continuous Improvement of the U.S. Education System*), “Achieving the President’s 2020 college attainment goal will require better and stronger systems, powered by information and innovation.”

This is why, in the past year, the Department has greatly enhanced our Civil Rights Data Collection with the release of groundbreaking data, disaggregated by major racial and ethnic group, gender, disability status under IDEA and Section 504 of the Rehabilitation Act, and other categories, on more than 72,000 schools nationwide.

In 2013, the Department intends to collect data from all schools, and not just a sample of districts, while coordinating that process with other data collections to assure there is no unnecessary duplication.

The Department will continue to release additional data to illuminate trends and disparities between advantaged and disadvantaged youth in, for example, the use of discipline, access to college-preparatory courses, and comparability of resources. To clarify our commitment to promoting the availability and use of data and data systems, we have added language to an action in Sub-Goal 5.1 (*Data Systems*).

With regard to school climate data, the Department agrees that such data should be available to inform states and school districts in their efforts to create positive school climates where students feel safe and supported in their classrooms and where adults and students can engage in meaningful ways. As we note in the introduction to Sub-Goal 2.3 (*School Climate and Community*), “Equipped with good information on school climate, states and school districts can employ strategies with demonstrated success for improving learning conditions, such as rethinking the length and structure of the school day, providing time for teachers to collaborate to meet academic challenges, and adopting evidence-based programs, such as positive behavior intervention and supports (PBIS), that improve student’s behavior while also reducing substance abuse and school violence.” We also note that the Plan includes the following action under Sub-Goal 2.3: “Build state, district, and school capacity to collect and use school-level climate data and other metrics to tailor approaches that effectively address local needs, facilitating partnerships where appropriate to focus on common metrics across sites.”

Changes: Under Sub-Goal 5.1 (*Data systems*), we have added the following phrase to the first example of an action the Department will take: “...especially data disaggregated by student subgroups. The action now reads as follows:

Facilitate the development of the infrastructure necessary to collect and disseminate high-value education information for the improvement of child and student outcomes, especially data disaggregated by student subgroups.

Comment: One commenter suggested that the Department elevate Sub-Goal 5.4 (*Technology & Innovation*) to be a goal unto itself.

Response: It is clear that technology has the potential to bring about truly transformative change in education, as it can fundamentally change how we deliver education, tailor instruction to the needs of individual students, assess learning, and deal with a host of other issues. At the same time, we think it is crucial that technology be incorporated in a way that is thoughtful and integrated so that it is used in ways that most benefit students and teachers. Addressing technology in an integrated way ensures it does not become an expensive add-on that increases costs but does not help students learn or teachers teach. Accordingly, we believe it is important that multiple goals and Sub-Goals within the Plan consider the role of technology, rather than having a separate goal.

Changes: No changes necessary.