

The National Association of State Title I Directors RECOMMENDATIONS FOR ESEA REAUTHORIZATION

**Two roads diverged in a wood, and I—
I took the one less traveled by,
And that has made all the difference.**

Robert Frost, from The Road Not Taken

We must have the courage to face the challenge and follow our vision down a road less traveled and to make a permanent difference in the lives of our children who are living in poverty. These children represent one of our nation's greatest resources.

Making important changes will not be simple. Over the past year, our nation's economic engine has slowed, and while there is the expectation of full recovery, the truth is that it will not occur without improving our nation's education system. Our nation needs to stop facing each education challenge as if it will be solved in an instant. We know what it will take to improve schools and create the learning environments where children thrive and will be fully prepared to meet the challenges of their time.

We, the National Association of State Title I Directors (NASTID) an association of State Title I Directors—believe that, the federal government should focus its efforts on the most critical elements of the Title I program to make the changes needed.

The members of NASTID are the state officials who implement the nation's Title I program to assure that every child has access to an effective education—an education that is essential to each child's future ability to learn, function, and produce. As President Obama, his administration, and the 111th Congress set an education agenda for the nation, we ask them to focus on three core elements:

- standards, assessments, and accountability
- financial systems of support
- teacher and leader effectiveness.

These core elements, in our experience, are in need of change in order to reach our neediest and most at-risk students.

Standards, Assessment, and Accountability

NASTID strongly supports accountability for improved student performance for children in Title I schools. The academic standards for these children must be the same as those for children in more advantaged schools. NASTID believes that the current system could significantly improve by making the following changes.

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Establish National Standards and Assessments in Reading/Language Arts, Mathematics, and Science

NASTID supports the development of the College and Career Ready Standards. We believe that this will make a significant difference in what we expect all students to learn. However, national standards are only one step. We believe that states should have the ability to expand on these standards and reflect, where possible, the further progress that can be made with appropriately more rigorous items. In addition, we believe that the national standards will need to have effective and aligned assessments that provide both benchmarks of progress and information to inform instruction. Just developing a system of standards and assessments will not be enough for our nation's struggling schools. Title I schools will need additional support. This support will be for not only the use of the standards and the accompanying assessments, but also the needs of lowest performing schools to take the steps to improve instruction through ongoing professional development that incorporates the national standards, aligned assessments, and the specialized elements of teaching and learning in high-need communities.

Redefine State Responsibilities

The responsibility of how to reach these standards, the setting of incentives and corrective actions, and other issues related to the accountability system should be left to the states. Prior to the enactment of No Child Left Behind (NCLB), many states had accountability systems, often based on state legislative requirements.

Some states are now operating *both* state and national systems. This duality wastes resources and confuses parents and the public. States are the agencies responsible for education and should carry out that responsibility as their local requirements demand. The federal role should be to cooperate with the states to choose the appropriate system of accountability. Accountability for *districts and schools* would be more effective as a state function. As a result, we recommend that a reauthorized ESEA should fund and promote the state development of systemic models of support which build district-level capacity for school improvement and sustainability.

In addition, public school choice and supplemental educational services (SES) may remain options for schools identified for improvement, but should not be federal requirements. Further, improvement activities should be related to the areas identified by assessments rather than to the entire school.

Assess Special Needs Students

It continues to be a challenge to meaningfully incorporate students with disabilities and English language learners (ELL) in the assessment and accountability systems. Valid alternative assessments have proven elusive. Current time requirements for inclusion of ELL students in regular assessments do not take into account the great variances among these children. For instance, an ELL student starting school in kindergarten has vastly different needs from a student beginning U.S. education in grade nine. ELL exemptions from accountability calculations should be allowed for each student until he or she has reached English language proficiency.

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Similarly, setting arbitrary percentages for exclusion of children with disabilities also has problems. Decisions on inclusion of these students in regular assessments should be made by experts in those fields who are operating in the best interest of the child.

Disaggregation of results for various groups should be continued and requirements strengthened so states cannot establish procedures that dilute the impact of the provision. Provisions related to inclusion or exclusion of various groups from accountability requirements should be uniform throughout the country, rather than differing widely from state to state.

Financial Systems of Support

One major impact of our current economic challenges will be more students becoming eligible for Title I services. School districts will have greater need for federal funds to reach these students. Given this need to expand the program, it is important to improve our use of funds and strengthen the supplemental nature of the program—as well as to ensure that comparability of services is maintained.

The federal government should expand its support of teacher education, research, leadership, and policy development programs in the area of educating disadvantaged children. The effects of poverty have been discussed and research has been conducted on how it impacts teaching and learning. However, this research has not kept pace with the ever changing needs of the Title I community. What does it mean to have a “digital divide” in the Information Age, and how can teachers adapt? How do the increased numbers and range of cultures in high-poverty communities impact how curriculum is structured in those schools? How should parents be involved? How does this change by culture?

Expand Title I to Middle and High School

There is a crucial need to expand Title I services to middle and high school students. While some middle school and high schools currently provide Title I services—often in separate high school districts that receive Title I allocations—Title I remains essentially an elementary school program. The infusion of funding via the American Recovery and Reinvestment Act (ARRA) is welcomed and has helped to mitigate that situation somewhat, but any improvement through ARRA is at best temporary.

The theory that services at the elementary school level are sufficient to carry Title I students through to success in the upper grades is not valid. The importance of this issue cannot be overstated. According to the Alliance for Excellent Education, the national rate for completion of high school within four years is an unacceptable 71%. The graduation rates for Hispanic, African American, and American Indian students are even lower. On both moral and economic grounds, this trend cannot continue. Therefore, we urge additional efforts to put services in place in the higher grades, whether as part of Title I or as a separate program.

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Revise School Improvement (1003a) Funding Formula

As several reports from the Center on Education Policy have documented, the current school improvement funding system is seriously flawed. Deducting school improvement funds for districts which were scheduled to receive increases works against our improvement goals.

In NCLB, Congress moved to have the Census Bureau make annual estimates of the numbers of Title I children in each school district so that allocations could be adjusted to population changes. Under the current system, however, those districts that gained in the number of poor children see their increases reduced or eliminated by the required state reservation of funds for school improvement. NCLB does contain another authority for school improvement—and additional funds have been appropriated—but the reservation requirement remains in place. Funds for school improvement should come from a separate authority—not from district allocations—and should not be bound by general requirements that inhibit proper and sensible use of the funds.

We support providing annual updates of the estimates of poor children in each district in order to better allocate funds to districts in greatest need. However, use of a single year's estimate has resulted in a great deal of variation in allocations. Districts and states receive significant increases one year, only to lose funds the next year. We suggest that three-year averages be used to make allocations. This measure would smooth out the volatility and likely result in more stable allocations.

Revise School Improvement (1003g) Rules

In 2009, the U.S. Department of Education (ED) changed how federal funding would be used in the School Improvement section of NCLB. One of the four paths is to use school turnaround models, which require the replacement of the principal. We believe that this should be a school district option, not a federal mandate. The policy must be changed to allow states the authority to grant waivers to districts that seek to retain a building principal when using a school reform model that requires principal dismissal. Such waivers would only be granted if the district provided data that indicates the school is moving on a course that will likely produce measurable student improvement in the near future. A fifth model which is locally developed with state and/or Department of Education approval would also be a reasonable addition.

Reauthorization must focus on increasing the capacity of districts to accelerate achievement for every student in each of the districts' schools. This would be accomplished by focusing on standards-based curricula, effective instruction, diagnostic assessments, and progress monitoring in every classroom. School-by-school improvement or turnaround has not led to wide-scale improvement across the state. Heavily resourced schools can make dramatic gains, but success at sustaining those gains when resources are no longer available has been limited.

The U.S. Department of Education should provide states with ongoing, adequate, and dedicated funding to support both district and school improvement efforts, specifically in the areas of systems improvement, building capacity, and sustainability. However, support is needed beyond simply the notion of building systemic school reform models.

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Fund States' Additional Responsibilities

With NCLB, states were given more responsibility for accountability. Certain activities related to accountability were extended to all schools, not just those receiving Title I funds. It is time to recognize the cost to states for this substantial additional responsibility and to increase funds for state administration. States cannot carry out all their responsibilities effectively with the current level of support. Lifting the 1% cap on Title I state administration dollars and not binding it to an overall national funding threshold (i.e., \$14 billion) would better allow us to meet the demands of the nation for measuring, gathering data, and to using that data to inform the changes that are demanded.

Equalize Funds

Researchers at the University of Washington have raised serious questions about the methods used to measure financial comparability, a provision designed to ensure high-poverty schools receive their fair share of state and local funds before Title I funds are provided to them. Specifically, researchers have provided information that the use of the same salary amount for all teachers at various degree levels—rather than actual salaries—does not provide equal funds to poor schools whose teachers have fewer years of experience and lower salaries. NASTID supports strengthening the financial comparability provision so poor schools receive their fair share of state and local funds. Further, the Title I funding formula should be revised in order to establish an equitable base amount for each eligible student.

Teacher and Leader Effectiveness

We need to increase the effectiveness of teachers and leaders currently serving in high-poverty schools as well as improve recruitment and retention of effective teachers. NCLB has properly identified improving the effectiveness of teachers and leaders as a main component of student academic achievement improvement. Rather than tying effectiveness directly to student outcomes, however, NCLB seeks to measure that effectiveness through proxies, such as having a major in the subject taught, or through administration of competency tests. Teachers, school leaders, and the entire system need to be linked together. Five things need to be done:

- First, models of school improvement need to be developed that provide examples of how teachers and leaders can collaborate on building an effective plan for school improvement.
- Second, we need to continue to assess teachers' and leaders' effectiveness based on how well their students perform academically and provide that information to schools and colleges of teacher education to link effective instruction with how new teachers and leaders are being prepared.
- Third, we need to get effective teachers and leaders in our high-poverty/high-minority schools.
- Fourth, we must retain the most effective teachers and leaders in our high-poverty/high-minority schools. This goal will require incentives for high-performing teachers to go to (and stay in) schools with high-poverty enrollments.

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- Fifth, we need to identify teachers and leaders who are less effective and provide means to improve their performance. If that effort fails, we need to remove them from the schools

Provide Incentives That Work

Research shows that financial incentives alone are not sufficient. In addition, the “system” needs to move beyond the notion that teachers and leaders are merely factors of production that can be interchanged. Collaboration with all elements of the local-state-federal system needs to take advantage of expertise at all levels and find ways to encourage cross-over. Federal administrators should be encouraged to take time to work in Title I schools, state leaders to work in federal programs, and teachers in research universities. The walls at all levels have become their own barriers. Other incentives might include increased retirement credit for years served in those schools, increased opportunity for long-term professional development, and opportunity for participation in other federally sponsored activities (such as serving as readers for some federal discretionary programs). In addition, the work environment in many high-poverty schools must be improved.

Coordinate Professional Development

Currently, NCLB requires that local school districts use funds received under Title IIA (Teacher Training and Recruitment Fund) in schools identified as “in need of improvement” under Title I or other high-need schools. Title I funds are also provided for this purpose. The interaction of the two sources of funds to improve teacher quality is not always easily accomplished.

Furthermore, the existence of two separate authorities and two separate program administrations complicates the delivery of services in a coordinated manner. Finally, a recent report by the Education Sector questioned the effectiveness of Title IIA noting that, in general, it “is not especially aligned with leading edge (teacher quality) efforts.”

Therefore, we recommend that current Title IIA, except Subpart 5 related to National Activities, be folded into Title I with the stipulation that funds be used for professional development for teachers and principals, along with other Title I funds used for that purpose. This change will:

- better target Title IIA funds to the neediest schools
- provide a unified professional development program for Title I schools
- enable districts and schools to better carry out their responsibilities for improving teacher effectiveness.

In addition, the Campaign for Educational Equity at Teachers College, Columbia University stresses the need for professional development that:

- improves teacher proficiency in regard to academic standards
- improves ability of teachers to effectively teach students from diverse backgrounds.

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NCLB required the use of professional development based on scientific research without noting what that development might entail. Title I needs to encourage professional development based on solid research. There is widespread agreement that effective professional development is:

- job-embedded
- content-centered
- ongoing, rather than episodic or sporadic.

Teacher training institutions need to put more focus on teaching in high-poverty schools. Federal incentives can encourage more good teachers to go to high-poverty areas. School systems need to better coordinate with higher education programs.

Long-Term Success

Changing NCLB and providing the resources—both financial and professional—that our disadvantaged students need to be successful is essential for the long-term health of our nation.

We believe that this effort can be accomplished by focusing on three “big-picture” facts:

- standards, assessments, and accountability
- financial systems of support
- teacher and leader effectiveness

Far too often during prior reauthorization processes, our discussions have focused on technical compliance issues. We support the current efforts on developing national standards, increasing attention on and support for high-need populations, and focusing on teacher and leader effectiveness.

A national set of standards will be a major step to ensure that every child gets access to the education he or she needs to become a successful learner and contributing citizen. No child should be held back from learning just because of where he or she lives—or for any other reason.

Additionally, the Elementary and Secondary Education Act should include specific programs targeting high-need populations to build the secondary section of this Act. We should target resources to the schools with large numbers of students who drop out of school. Title I does currently provide some resources for middle and high schools, and this provision either needs to be expanded or a separate program should be created.

Central to the program is the teacher. Simply put, we need to have better information on how well students are learning and what needs to be changed. While we have been looking at time-on-task and the educational background of the teacher, we need to support teachers’ needs for improved academic standards, teacher training to work with a diversity of student needs, and ongoing professional development. Effective leaders are needed to ensure success in schools and across the districts.

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We opened with a quote from Robert Frost on the value of making tough choices. We believe that the road less traveled in 2010 is for the federal government to set the goals and provide funds to ensure that all students have the ability to attend effective schools. Clearly this means that the federal government must continue to supplement state and local funding where communities do not have the economic base to ensure that every child has access to a 21st-century education. Furthermore, it is the responsibility of states to work with local schools to integrate those funds and additional resources to help local schools to meet the needs of all of their students AND to give extra effort to those serving our neediest students. Implementing these changes will decrease the achievement gap and enable students to be more competitive nationally and globally.

We must have the vision and courage to create an education system to bring all students' potential to reality.

For more information contact:

Richard Long
National Association of State Title I Directors
RichLong@titlei.org
800-256-6452