The Evolving School Improvement Fund

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I.

Introduction

The School Improvement Fund (Section 1003(g) of Title I of the Elementary and Secondary Education Act) recognizes that schools with high percentages of students in poverty may require additional support in order to help their students achieve academic proficiency. As such, the 1003(g) School Improvement Fund has since 2007 provided competitive funding opportunities to Title I schools considered to be in improvement status under the No Child Left Behind Act of 2001 (NCLB). The Fund has provided vital financial support necessary to make critical improvements in the teaching and learning environment of grantee schools, including enhancing professional development for teachers, hiring additional staff to support small-group and individualized instruction, and purchasing classroom instructional technology. All fifty states received School Improvement Fund grants in the 2008-2009 school year. Twenty-eight states and the District of Columbia have received funding for the 2010-2011 school year. In addition, as of the first round of competition for the supplemental Race to the Top funding, Delaware and Tennessee were the only two of the forty-one applicants selected to receive supplemental funding.

While the underlying motivation for the 1003(g) School Improvement Fund has always been increasing student achievement, the guidelines determining how the funds should be used to achieve this goal were recently reexamined. This paper will outline the original form of the School Improvement Fund, examine the recent changes to the requirements governing the Fund, and provide an overview of the goals for the new requirements. In addition, we will analyze public input on the proposed changes as demonstrated by the comments submitted to the USDOE during the public comment period of August 26th through September 27th, 2009. Responses were submitted by a wide range of stakeholders, including unions, nonprofits, individual schools, and local education agencies, but we will focus here on the responses submitted by State education agencies (SEAs). Due in part to their supervisory and coordinating roles, the comments submitted by SEAs reflected their macro-level views of the school improvement process and were considered most useful for the analysis undertaken in this paper.

II.

Original Form of School Improvement Fund

Section 1003(g) of Title I, also referred to as the School Improvement Fund, provides assistance to qualifying local schools in the form of grants. Qualifying schools are those schools that do not, as mandated by NCLB, meet state achievement targets for two consecutive years. The expected results of the 1003(g) School Improvement Fund include “improving student proficiency, increasing the number of schools that make adequate yearly progress, and using data to inform decisions and create a system of continuous feedback and improvement” (USDOE, 2007, p. 2). In short, the 1003(g) School Improvement Fund is intended to help schools meet the achievement standards set by NCLB.
Until August 2009, in order to achieve these results and build the capacity of local education agencies (LEA) and schools, each SEA and LEA was permitted to select the strategies it expected to be most effective, including offering professional development for school staff, implementing research-based instructional practices, and developing partnerships with outside organizations (USDOE, 2007, p. 3). The use of strategies with a research basis was particularly encouraged. Districts were required to provide consultation, coordination and qualified professional development tailored to the individual needs of schools (Escambia County School District, 2008). Support for choosing research-based strategies was also provided by the USDOE, which would “assist States in encouraging LEAs to use their school improvement funds only on those programs that are proven to be effective in rigorous research” (United States Senate Report 110-410, 2008).

In the 2008-2009 school year, all 50 states as well as Washington DC and Puerto Rico received School Improvement Fund grants. Many states used funds to support professional development and increase schools’ capacity to effectively utilize data. In Idaho, for example, schools partnered with regional university support centers. In North Dakota, funds were used to provide training to the North Dakota School Support Team, which helped build capacity at the LEA and school levels.

During the 2008-2009 school year, the Center for Evaluation and Education Policy at Indiana University conducted an in-depth evaluation and analysis of how the thirty-eight grantee schools in Indiana implemented the 1003(g) grant. Schools selected strategies for improvement based on self-reported needs and goals, which included after-school programs, extended year programs, preschools, technology introduction, teacher collaboration and a range of professional development activities. Many of the grants were used to empower teachers to use data to inform practice and facilitate small group instruction. In grantee schools, staff members asserted that the grant was critical in helping teachers work with students on an individual level. The principal of one grantee school shared her belief that the grant “is making a difference for students” and she observed that the grant encouraged her staff to “focus on best practices.” Moreover, principals, teachers, and district officials all expressed that the grant helped them implement positive changes in their schools that would not have otherwise been able to.

III.

Recent Changes to the School Improvement Fund

In order to support its commitment to the development of NCLB, particularly in regards to standards and accountability, the USDOE recently proposed significant changes to the structure of the 1003(g) School Improvement Fund, including changes in how funding is to be distributed and which strategies for improvement can be undertaken. These changes appear to have been precipitated by three primary factors.

First, the level of funding allocated for 1003(g) School Improvement Funds increased significantly in FY 2009. Originally $125 million in fiscal year FY2007, the Fund was increased to $546 million in FY 2009. This increase was further supplemented by an additional $3 billion from the American Recovery and Reinvestment Act of 2009 (ARRA) in the form of the Race to the Top fund. The requirements govern the total $3.546 billion allocated for the School Improvement Fund in FY 2009, a sum that Education Secretary Arne Duncan says will provide LEAs “an unprecedented opportunity to implement intensive
Second, the USDOE recognized that schools were entering restructuring at much higher rates than they exit, suggesting that the current reform models were not functioning as effectively as had been hoped or expected. For example, during the 2006-2007 and 2007-2008 school years, 1,521 more schools entered restructuring than exited (USDOE, 2009, p. 3). Consequently, the new guidelines specify that states should target the majority of their funds to the lowest-performing schools. In contrast to the prior USDOE guidance, in which no additional stratification of schools was required, under the revised regulations, SEAs will have to identify three tiers of schools. In order to “drive school improvement funds to LEAs with the greatest need for those funds,” SEAs will have to give priority to LEAs that serve Tier I and Tier II schools (74 Fed. Reg. 164 (26 August 2009) 43102).

Third, of the 45 states with schools in restructuring in the 2006-2007 school year, 29 selected “other” as their restructuring strategy (USDOE, 2009, p. 4). The USDOE, however, appears to have had reservations about the prevalence and effectiveness of this choice. As a 1003(g) factsheet released by the USDOE in August 2009 observed, the “vast majority” of schools that failed to make AYP for five years “adopted the least rigorous restructuring intervention option required by the ESEA” (USDOE, 2009b, emphasis added). As of FY 2009, the USDOE will require all schools to adopt one of four specific models for restructuring, including the following: the Turnaround Model, which requires replacing the principal and at least 50% of the school staff; the Restart Model, in which an LEA would close the school and reopen it under the management of a charter school operator, a charter management organization (CMO), or an educational management organization (EMO); the School Closure Model, in which an LEA would close the school and enroll the students who attended the school in other, higher-performing schools in the LEA; and the Transformation Model, which requires schools to develop teacher and leader effectiveness and create community-oriented schools.

Although the changes described above represent a significant departure from the past guidelines, under which SEAs had a great degree of latitude in how they chose to implement 1003(g) School Improvement Fund grants, the goals for the Fund remain largely unchanged. As the USDOE notes, “This assistance is intended to help these schools implement reform strategies that result in substantially improved student achievement so that the schools can make AYP and exit improvement status” (74 Fed. Reg. 164 (26 August 2009), p. 43102). At the same time, the changes appear to represent an increased focus on rapidly achieving widespread change. “The Secretary is committed to turning around over five years the 5,000 lowest-achieving schools nationwide, and School Improvement Grants are a centerpiece of that strategy. The Secretary’s strategy includes…supporting only the most rigorous interventions that hold the promise of producing rapid improvements in student achievement and school culture” (74 Fed. Reg. 164 (26 August 2009), p. 43102). In addition, although the changes
increase the role of the federal government in schools and diminish the authority given to LEAs and individual schools, LEAs and schools will remain ultimately accountable for student achievement. The USDOE maintains, ”…the Secretary would require an LEA to establish three-year student achievement goals in reading/language arts and mathematics. The LEA would hold each Tier I and Tier II school it serves with school improvement funds annually accountable for meeting, on being on track to meet, those goals…and for making progress on the leading indicators of school reform” (74 Fed. Reg. 164 (26 August 2009), p. 43103).

IV. Future of the 1003(g) School Improvement Fund

Before adopting the new guidelines outlined above, the USDOE published a notice seeking comments on the requirements discussed above. Responses were submitted by a wide variety of individuals and groups and included responses from special interest groups, nonprofits, businesses, LEAs, SEAs, individual schools, and individual citizens. A total of 182 unique responses were catalogued on the USDOE website. Systematically examining the submissions offered insight into the national debate emerging on both Title I and 1003(g) School Improvement Fund grants and revealed a number of trends. As discussed above, in order to examine the public comments from the most macro-level view available, this paper will focus exclusively on the comments submitted by SEAs. In this section, we will focus the following themes that emerged from SEA comments: doubt about the applicability of the Turnaround model; alarm over the delayed dispersal of funds; concern about limits on the number of schools that can implement similar interventions; confusion about the tier model; and suggestions about how the proposed regulations might be improved.

The first trend revealed among the comments submitted by SEAs was doubt about the applicability of the Turnaround model. Specifically, many comments revealed SEA’s concern about the feasibility of replacing school principals and half of the school staff, as well as with closing schools. Representatives from States with significant rural areas observed that new staff members and principals may not exist in rural areas, making the replacement of staff extremely challenging. As the Kentucky Department of Education observed, “If schools in rural areas had to release 50% of their teachers under the “turnaround model,” it would be very difficult for those schools to replace teachers. In many parts of Kentucky, the school district is the largest employer and few non-employed teachers are living in the area that would be able to fill those positions” (The Kentucky Department of Education, 2009). The Montana Office of Public Instruction added, “In states that are predominantly very rural and sparsely populated, the idea that other educators are going to be readily available to fill these slots is extremely unrealistic” (The Montana Office of Public Instruction, 2009). Furthermore, New York pointed out that “the constitutionally protected tenure rights of the teachers and/or principal” served as an additional barrier to replacing principals and teachers (The New York State Education Department, 2009).

In addition to the practical challenge of replacing staff and principals anticipated by the SEAs, many SEAs also observed that there is no apparent research base for replacing large numbers of teachers. As the Wisconsin Department of Public Instruction observed, “While research and experience indicate that school leadership and high quality teachers are crucial to student success, there is not compelling evidence that replacing at least half of a school’s staff will generate better student outcomes” (Wisconsin Department of Public Instruction, 2009). Moreover, SEAs anticipated that drastic reductions in staff would damage morale at schools and undermine the previous efforts at school
reductions in staff would damage morale at schools and undermine the previous efforts at school improvement. The Washington State Office of Superintendent of Public Instruction wrote of the new restrictions on intervention strategies, “Perhaps of more significance is the effect on the superintendents, local school boards and thousands of educators in these districts who committed to engage in evidence-based reform…” Abandoning this project in the midst of implementation disrespects the extraordinary efforts of these educators and leaves them once again in the position of starting over” (Washington Superintendent of Public Instruction, 2009, emphasis original).

Second, many SEAs expressed disappointment and alarm over the proposed delay in the dispersal of funds. SEAs observed that such a long delay would significantly disrupt their ongoing efforts at school improvement and impede their ability to implement new methods for school improvement. As the Washington Superintendent of Public Instruction asserted, “The potential impact of the delay of over $7 million in Title I 1003(g) funding in 2009-2010 on Washington’s educators is alarming. Specifically, this delay will result in the elimination or significant reduction in promised services to over 100 districts and their schools” (Washington Superintendent of Public Instruction, 2009). Similarly, the Colorado Department of Education observed, “We believe it is inappropriate to apply the proposed guidance and, as a result, delay the distribution of the non-ARRA 1003(g) funds. These funds are subject to approved plans previously submitted by our LEAs under guidance that existed at the time of application” (Colorado Department of Education, 2009).

A number of SEAs and LEAs noted that they were concerned about how such a delay in funding would impact the morale of their teachers and school staff, as well as the achievement of their students, who have been engaged in significant school improvement efforts. The Arizona Department of Education, for example, warned, “Schools least likely to respond nimbly to change are being thrust into a situation that breeds confusion and uncertainty. This is not a scenario likely to encourage a successful year of teaching and learning. The delay in access to Section 1003(g) funds for the current school year is extremely counterproductive to the serious work of improving schools in Arizona” (Arizona Department of Education, 2009). In addition, the Texas Education Agency observed that because it may not be aligned with the fiscal or school years, the timing of the new grant cycle may yield additional barriers to implementation. “TEA recommends providing additional flexibility to allow SEAs to give LEAs that are awarded School Improvement Grants a planning period in the first year of the grant…It will be difficult for LEAs to implement rigorous Tier I interventions, such as turnaround and restart, without additional planning and time to communicate with stakeholders” (Texas Education Agency, 2009).

Third, many SEAs expressed concern about the proposed restrictions on the percentage of schools in any district that could adopt similar interventions. According to the USDOE model, SEAs must “Ensure that an LEA with nine or more Tier I and Tier II schools does not implement the same model in more than 50% of those schools” (74 Fed. Reg. 164 (26 August 2009), p. 43103). Many states commented that this restriction appeared to be arbitrary and lacked research support. As the Massachusetts Department of Elementary and Secondary Education asserted, “We feel that this limitation may severely inhibit a district’s choice of scale-able improvements and believe SEAs should have the flexibility to evaluate an LEA’s choice of Turnaround model regardless of number of schools impacted” (Massachusetts Department of Elementary and Secondary Education, 2009).

Washington’s Superintendent of Public Instruction asserted that “LEAs with persistently low-achieving
schools may not have either the leader and teacher capacity or the systems to effectively and fully implement multiple interventions. Research…suggests districts are better able to support, monitor, and sustain reforms in each of their schools when they implement similar evidence-based practices and interventions across all of their schools” (Washington Superintendent of Public Instruction, 2009, emphasis original). The Wisconsin Department of Public Instruction noted that such a requirement may create additional burdens for the state: “Moreover, there is no research base to support the effectiveness of a multiple intervention approach, which would have higher marginal costs and administrative challenges” (Wisconsin Department of Public Instruction, 2009). The California Secretary of Education observed that such a restriction may not be appropriate for urban areas with many schools: “We believe that such a limitation is too restrictive, especially for a large urban school district” (State of California Office of the Secretary of Education, 2009).

Fourth, many SEAs commented that the tier system was either unclear, flawed, or both. A number of states expressed the belief that the tier model was overly prescriptive and did not take the uniqueness of schools and LEAs into account. As a result, many SEAs had questions about how the tier model would impact the authority of SEAs. For example, the Illinois State Board of Education (ISBE) suggested, “…it is unclear how these tiers will apply to non-traditionally configured schools, such as k-12, k-8, or 6-12. ISBE understands the focus on high schools and the lowest-performing schools, but consideration must also be given to the feeder schools that…may not be preparing students for the rigor of advanced study and independent learning that is required at the high school level” (Illinois State Board of Education, 2009).

In addition, comments suggested that SEAs are displeased about the extent to which the proposed tier guidelines would restrict the flexibility of SEAs and LEAs to target funds to particular schools. As the Nevada Department of Education asserted, “The proposed intense focusing of funds will divert these resources to a very small group of schools while other initiatives languish. In Nevada with a small overall pool of schools and a correspondingly small number of identifiable Tier I schools, the impact of this diversion is to provide a tremendous amount of funding that will only impact the few very lowest schools” (Nevada Department of Education, 2009).

Finally, many SEAs and LEAs proposed alternatives to the proposal of replacing the principal and significant numbers of staff, the majority of which were focused on providing additional professional development opportunities for staff. The Vermont Department of Education, for example, shared their belief that additional training and support can help principals and school staff develop the skills necessary to help students succeed. “Instead of the replacement of principals requirement, Vermont proposes that the School Improvement grant process permit states like ours to have a major focus on offering effective, demanding, and comprehensive support for school leaders (and other staff) whose schools receive [School Improvement] funds” (Vermont Department of Education, 2009).

Similarly, after observing that the Turnaround model “seems to rest on the shaky proposition that there is an untapped reservoir of highly effective teachers out there somewhere,” the Nevada Department of Education added, “there should be consideration of providing…professional development to teachers already in the system that show promise through evaluations, and make them accountable for acquiring and using effective strategies” (Nevada Department of Education, 2009). The West Virginia
Department of Education suggested that rather than removing the principal or staff, schools could hire “a ‘turnaround leader’ who reports directly to the LEA’s Superintendent or to a new ‘turnaround office’ in the LEA or SEA” and who would receive professional development designed and delivered by the SEA. (West Virginia Department of Education, 2009)

A number of states suggested the USDOE provide exemptions for those States already implementing successful school improvement initiatives. For example, “Georgia recommends that waivers be given to the states that have 1003(g) grants allowing them to continue with the previously approved implementation plan” (Georgia Department of Education, 2009). Similarly, the Alaska Department of Education and Early Development suggested, “Allow the flexibility for SEAs to continue to fund for a second or third year schools that received 1003(g) grants in the past year that are showing improvement. These grants were awarded with the understanding that they would be renewable to [sic] years and the lack of funding for 2009-2010 may be hampering continued improvement efforts” (State of Alaska Department of Education and Early Development, 2009).

As of the initial deadline of January 20, 2010, ten states, including Texas and Montana, which voiced opposition to the new regulations during the comment period described above, had decided not to apply for the supplemental Race to the Top funds (Dillon, 2010). However, many States that initially voiced opposition to the regulations ultimately decided to submit applications. Keith W. Rheault, the School Superintendent of Nevada suggested that such decisions may have been based less on a belief in the potential efficacy of the regulations and more on financial necessity: “When you’re starving and somebody puts food in your mouth, it’s amazing what states will do” (Dillon, 2010). On March 29, 2010, Arne Duncan announced that Delaware and Tennessee were the only two states to have won grants in the first round of the competition. Neither state had submitted a response to the revised School Improvement Fund guidelines during the public comment period. As Duncan said when announcing the results, “We received many strong proposals from states all across America, but two applications stood out above all others: Delaware and Tennessee…Both states have statewide buy-in for comprehensive plans to reform their schools. They have written new laws to support their policies. And they have demonstrated the courage, capacity, and commitment to turn their ideas into practices that can improve outcomes for students” (USDOE, 2010). Applications for Phase 2 of the Race to the Top competition are due June 1, 2010. It is not yet known how many states that submitted applications during Phase 1 of the competition will resubmit application in Phase 2, though Duncan has suggested there will be “‘10 to 12’ more winners in the second round to share the remaining $3.4 billion” (Brill, 2010).

V.

Conclusion

In a September 2009 speech, Secretary Duncan’s reassurances about the importance of flexibility appeared to belie the USDOE’s decision to restrict school improvement efforts to only four models. “We must be flexible and accommodating as states and districts—working with parents, non-profits and other external partners—develop educational solutions. We should be open to new ideas, encourage innovation, and build on what we know works. We don’t believe that local educators need a prescription for success” (Duncan, 2009). Yet, as the SEA comments discussed above indicate, many SEAs do not recognize in the new regulations the flexibility, innovation, or accommodation that the Secretary purports to value. Moreover, some researchers suggest that such highly-centralized decision
making is inappropriate for schools. As Darling-Hammond argues, “Unless major reallocations of resources and authority are made from regulatory offices to schools and classrooms, we cannot expect schools to find either the financial means or the organizational momentum needed to make significant changes” (Darling-Hammond, 1990, p. 294). In addition, research suggests that forcing schools to choose from a limited number of options may not lead to real change in school climates or practices, but may merely indicate compliance (Datnow, 2000).

While the new regulations appear to prioritize swift reform over incremental change, there is doubt as to the effectiveness of this approach and concern about sustainability. As Hargreaves and Goodson observe, “Producing deep improvement that lasts and spreads remains an elusive goal of most educational change efforts. Ultimately, the sustainability of educational change…can only be addressed by examining change experiences in a range of settings from the longitudinal perspective of change over time” (Hargreaves and Goodson, 2006, p. 5). Furthermore, as Datnow argues, “Externally developed reforms need to be understood as part of an overall change process that is intended to orient the school towards continual improvement, not simply things that schools can insert and then abandon when test scores do or do not improve” (Datnow, 2000, p. 368).

Perhaps most troublingly, the USDOE’s previous insistence that schools and districts implement strategies and interventions with a strong research base appears to have been abandoned at the federal level. The proposed guidelines display an apparent lack of regard for ensuring that strategies have research support. As Secretary Duncan asserted in a recent speech, “We don’t need another study….We need action” (Duncan, 2009). States observed that the lack of research puts SEAs in the difficult position of imposing a model that they may not necessarily support or whose justification they may not understand. As the Illinois State Board of Education observed, “ISBE respectfully requests that [USDOE] provide the research that shows that each available interventions [sic] results in successful school and student improvement. Without a solid research base, it is challenging to mandate these options and troubling that schools will be held accountable for results while using unproven interventions” (ISBE, 2009).

Indeed, in spite of the strongly prescriptive nature of the revised requirements, the USDOE has failed to provide SEAs with evidence justifying the changes. At the same time, the burden for school improvement continues to rest largely at the level of individual schools, which have increasingly little choice and power over how to achieve education goals. This incongruity has clearly disturbed many stakeholders, particularly at the State level, and may impede the adoption of new regulations, as well as disrupt continued efforts for school improvement. Although it remains to be seen how the thirty-nine applicants that were rejected during Phase 1 of the Race to the Top application process will respond during Phase 2 of the competition, it seems clear that not all states will have the opportunity to support their school improvement efforts with supplemental grants.

Works Cited


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