BOARD OF DIRECTORS MEETING

OCTOBER 25, 2014

MILWAUKEE

Board of Directors Meeting October 25, 2014 Milwaukee

AGENDA

CONVENE 8:30 a.m.

A. Introduction and Quorum Call	
o Executive Committee Members	6
B. Minutes	
o Board of Directors Meeting of March 23, 2014	
C. Committee-of-the-Whole	
o Annual Reports	
o Conferences and Meetings	
o Legislation	
o Communications	
o Research	
o Task Force on Achievement	
o Task Force on Professional Development	
o Task Force on English Language Learners and Bilingual Education	
o Task Force on Leadership, Governance, and Management	
o Task Force on Finance	785
D. Report of the Executive Committee	
o Membership Subcommittee	
o By-Laws Subcommittee	
o Audit Subcommittee	
o Strategic and Succession Planning	858

ADJOURN 12:00 Noon

ABOUT THE COUNCIL

OUR VISION

Urban public schools exist to teach students to the highest standards of educational excellence. As the primary American institution responsible for weaving the strands of our society into a cohesive fabric, we — the leaders of America's Great City Schools — see a future where the nation cares for all children, expects their best, appreciates their diversity, invests in their futures, and welcomes their participation in the American dream.

The Great City Schools are places where this vision becomes tangible and those ideals are put to the test. We will keep our commitments, and as we do and as society supports our endeavors, cities will become the centers of a strong and equitable nation, with urban public schools successfully teaching our children and building our communities.

OUR MISSION

It is the special mission of America's urban public schools to educate the nation's most diverse student body to the highest academic standards and prepare them to contribute to our democracy and the global community.

OUR GOALS

To educate all urban school students to the highest academic standards.

To lead, govern and manage our urban public schools in ways that advance the education of our children and inspire the public's confidence.

To build a confident, committed and supportive urban community for raising the achievement of urban public schoolchildren.

Executive Committee

2014-2015

OFFICERS

Chair of the Board: Jumoke Hinton Hodge, Oakland School Board

Chair-Elect: Richard Carranza, San Francisco Superintendent

Secretary/Treasurer: Felton Williams, Long Beach School Board

Immediate Past-Chair: Valeria Silva, St. Paul Superintendent

MEMBERS

Cecelia Adams, Toledo School Board Jose Banda, Sacramento Superintendent JoAnn Brannon, Metro Nashville School Board Meria Carstarphen, Atlanta Superintendent John Deasy, Los Angeles Superintendent Lawrence Feldman, Miami-Dade County School Board Eric Gordon, Cleveland CEO Terry Grier, Houston Superintendent Michael Hanson, Fresno Superintendent Kaya Henderson, District of Columbia Chancellor William Isler, Pittsburgh School Board Pam Knowles, Portland School Board Heath Morrison, Charlotte-Mecklenburg Superintendent Michael O'Neill, Boston School Board Keith Oliveira, Providence School Board Shanaysha Sauls, Baltimore City School Board Airick West, Kansas City School Board Craig Witherspoon, Birmingham Superintendent Paula Wright, Duval County School Board **VACANT**

Ex Officio
Deborah Shanley, Brooklyn College CUNY Dean

Board of Directors (as of October 7, 2014)

CITY	SUPERINTENDENTS	BOARD MEMBERS
Albuquerque	Brad Winters (Interim)	Martin Esquivel
Anchorage	Ed Graff	Natasha Von Imhof
Atlanta	Meria Carstarphen	Leslie Grant
Austin	Paul Cruz (Interim)	Vincent Torres
Baltimore	Gregory Thornton	Shanaysha Sauls
Birmingham	Craig Witherspoon	Wardine Alexander
Boston	John McDonough (Interim)	Michael O'Neill
Bridgeport	Frances Rabinowitz	Sauda Baraka
Broward Co.	Robert W. Runcie	Laurie Rich Levinson
Buffalo	Donald Ogilvie (Interim)	James Sampson
Charleston	Nancy McGinley	Todd Garrett
Charlotte-Mecklenburg	Heath Morrison	Mary T. McCray
Chicago	Barbara Byrd-Bennett	Jesse Ruiz
Cincinnati	Mary Ronan	Alexander Kuhns
Clark County	Pat Skorkowsky	Stavan Corbett
Cleveland	Eric Gordon	Denise Link
Columbus	Daniel J. Good	Gary Baker II
Dallas	Mike Miles	Mike Morath
Dayton	Lori L. Ward	Ronald C. Lee
Denver	Tom Boasberg	Allegra Haynes
Des Moines	Thomas Ahart	Cindy Elsbernd
Detroit	Karen Ridgeway	Jack Martin
East Baton Rouge	Bernard Taylor, Jr.	David Tatman
El Paso	Juan Cabrera	TBD
Fort Worth	Patricia Linares (Interim)	Ashley Paz
Fresno	Michael Hanson	Lindsay Cal Johnson
Guilford County	Maurice Green	Rebecca M. Buffington
Hawaii Department of Education	Ronn Nozoe	Donald G. Horner
Hillsborough County	MaryEllen Elia	Doretha Edgecomb
Houston	Terry Grier	Paula Harris
Indianapolis	Lewis Ferebee	Samuel Odle
Jackson	Cedrick Gray	Monica Gilmore-Love
Jacksonville	Nikolai P. Vitti	Paula Wright
Jefferson County	Donna Hargens	Diane Porter
Kansas City	Steven R. Green	Airick West
Long Beach	Christopher Steinhauser	Felton Williams
Los Angeles	John Deasy	Steve Zimmer
Miami-Dade County	Alberto Carvalho	Lawrence Feldman
Milwaukee	Darienne Driver	Michael Bonds
Minneapolis	Bernadeia Johnson	Carla Bates
Nashville	Jesse Register	JoAnn Brannon
Newark	Cami Anderson	Antoinette Baskerville-
		Richardson
New Orleans	Stan Smith (Interim)	N/A
New York City	Carmen Fariña	N/A
Norfolk	Samuel T. King	Kirk T. Houston, Sr.
Oakland	Antwan Wilson	Jumoke Hinton Hodge
Oklahoma City	Rob Neu	Phil Horning
Omaha	Mark Evans	Merica Lacey

Orlando Barbara Jenkins E. Wayne Gent Palm Beach County William R. Hite, Jr. Philadelphia Pittsburgh Linda Lane Portland Carole Smith Providence Susan Lusi Richmond Dana Bedden Rochester Bolgen Vargas Sacramento Jose L. Banda St. Louis Kelvin Adams St. Paul Valeria Silva San Diego Cindy Marten San Francisco Richard Carranza Santa Ana Rick Miller

Seattle Larry Nyland (Interim)
Shelby County (Memphis) Dorsey E. Hopson, II, Esq.

Toledo Romules L. Durant

Washington, D.C. Kaya Henderson
Wichita John Allison

William Sublette
Debra L. Robinson
William Green
William Isler
Pam Knowles
Keith Oliveira
Jeffrey Bourne
Van Henri White
Christina Prichett
Rick Sullivan
Mary Doran
Kevin Beiser
Hydra Mendoza
Rob Richardson

Harium Martin-Morris

Kevin Woods Cecelia Adams

N/A Jeff Davis

Staff

Michael Casserly, Executive Director Teri ValeCruz, Director of Administration, Finance & Conferences Alisa Adams, Finance Manager Marilyn Banks, Administrative Assistant Terry Tabor, Conference Manager Shirley Lathern, Systems and Administrative Specialist Anna Barrera, Accounting and Conference Specialist Jeff Simering, Director of Legislation Julie Beth Halbert, Legislative Counsel Manish Naik, Legislative Manager Gabriela Uro, Manager of ELL Policy & Research Debra Hopkins, ELL Project Coordinator Carol Aguirre, ELL Policy Specialist Henry Duvall, Director of Communications Tonya Harris, Communications Manager Danyell Taylor, Communications Specialist Raymond Hart, Director of Research Renata Uzzell, Research Manager Moses Palacios, Research Specialist Ricki Price-Baugh, Director of Academic Achievement Denise Walston, Director of Mathematics Robin Hall, Director of Language Arts and Literacy Robert Carlson, Director of Management Services Michell Yorkman, Special Projects Manager Amanda Corcoran, Special Projects Manager Jonathon Lachlan-Haché, Special Projects Specialist

MINUTES

BOARD OF DIRECTORS

COUNCIL OF THE GREAT CITY SCHOOLS MINUTES BOARD OF DIRECTORS MEETING WASHINGTON, DC MARCH 23, 2014

Valeria Silva, Chair of the Board of Directors, called the meeting to order at 8:45 am. Present members introduced themselves. A quorum of the board was not established, but a quorum of the executive committee was present, and will ratify all votes.

Minutes

Valeria Silva presented the minutes of the November 2, 2013 meeting of the Board of Directors at the Annual Conference in Albuquerque, NM, and the January 24-25, 2014 meeting of the Executive Committee in Birmingham, AL. A motion to approve the minutes passed by a voice vote.

Nominations

Winston Brooks presented the nominations for Executive Committee officers, including Jumoke Hinton Hodge as the new Chair of the Board, Richard Carranza as the Chair-Elect, Felton Williams as the new Secretary/Treasurer, and Valeria Silva as immediate past chair. A motion to accept all officer nominations passed by voice vote.

A motion to renew the terms of Jose Banda, JoAnne Brannon, Winston Brooks, Larry Feldman, Eric Gordon, Michael Hanson, Heath Morrison, Keith Oliveira, Shanaysha Sauls, Airick West, and Craig Witherspoon passed by voice vote.

Finally, a motion to accept the nominations of Paula Wright, Pam Knowles, and Michael O'Neil to fill current vacancies on the Executive Committee passed by a voice vote.

Conferences and meetings

Casserly presented the meeting lineup for the remainder of 2014 and next year, not including webinars and common core convenings. He noted for the group that evaluation results on the annual fall conference were available in the board materials, and congratulated Winston Brooks on a successful conference.

The 2014 Annual Fall Conference will be held in Milwaukee, WI, and hotel information and venues are provided in the materials. Representatives from Milwaukee welcomed the group. A request for presentation proposals has been sent out. Neil deGrasse Tyson has been secured as a speaker, and we are working on booking remaining speakers.

The 2015 Annual Conference will be held in Long Beach, CA, and 2016 will be in Miami-Dade County. Five cities have expressed interest in hosting 2017—Baltimore, Cleveland, Ft. Worth, Kansas City, and San Francisco. We will be sending out further information, including criteria for hosting an Annual Conference, in a package of materials after this meeting.

Communications

The board materials include a sample of recent press releases, articles, and editorials. Council is quoted in national and local papers regularly. Casserly invited board members to inform us if our media outreach or editorializing is not representing their interests or positions.

There is a separate section for all the coverage on the release of TUDA scores. The Council worked hard to ensure that this message was consistent and focused on urban gains.

Materials also include coverage of our common core PSA at the Daytona 500. Next up will be the Brickyard 400 and the Indy 500. These and other common core videos and tools have gained substantial traction. Usage reports are provided in the materials. This outreach campaign may not have completely stopped criticism and pushback of the new standards, but it is making a difference.

The board materials also include the latest edition of *The Urban Educator* and an update on our video/social media contest. This project aimed to highlight personal accounts from parents and teachers about the good work of urban schools—an idea that came out of the Executive Committee. Unfortunately, we are running into challenges finding a sponsor or partner.

Bernard Harris Scholarships are now available, and we are accepting hard copy and online applications through April 7. If members want information on the application counts from your district, Henry Duvall can provide that information.

Casserly then invited the group's comments and advice on the overall direction and work of the Council's communications unit.

Legislation

Legislative issues will be covered in greater detail throughout the remainder of the conference sessions. But handouts were provided to outline some issues with education funding in the latest budget, as well as E-rate program developments via ConnectEd. These serve as possible issues to bring up with Secretary Duncan over our lunch following this meeting.

Jeff Simering then gave a brief legislative overview. After two decades, emphasis on K-12 education reform seems to be slipping. With our latest budget, we are seeing cuts to the programs on which we most depend. The group then discussed some of the negative consequences of the Obama administration's focus on RTTT.

Research

The board materials provide an overview of research activities, including a report on trends on TUDA. Over the past ten years, urban school progress has been substantial. Our averages are still below national averages, but our gains are greater.

Also, the materials include preliminary analysis of student performance on certain NAEP items that reflect the rigor of the common core standards. The goal was to get a sense of how districts are doing with these similar items and what achievement will look like on the new PARCC and Smarter Balanced assessments. The data also illustrate potential mismatches between current curricula and assessments, showing that concepts are sometimes taught either well before or after kids are assessed on them. Nonresponse rates by city are also provided.

In response to a question concerning the piloting of common core assessments, the Council's Director of Research Ray Hart clarified that the pilot slated for this spring is just a pilot of assessment *items*—it won't provide performance data for districts. It will, however, provide advance information on the logistical challenges of administering an online assessment building-wide. Los Angeles Superintendent John Deasy offered to share the results of upcoming field testing of the assessments in LA.

We are also continuing to push the testing consortia on language issues. If there is anything else that the membership needs the Council to be doing to help districts prepare for common core testing, please let us know. Board members responded with a discussion of technology challenges.

The discussion also touched on the need to address the gap between the materials/curricula and what will be assessed. There is a pressing need to identify what materials are truly aligned to the new standards. Casserly noted that the Council has an initiative in this area.

The research materials include updates on the black male achievement initiative. The Black Male Achievement Advisory Committee met yesterday to keep the work moving forward. We're starting a series of webinars in partnership with the publishers of the eBook. We are also plugged into the work being done by the Obama administration on the "My Brother's Keeper" initiative.

There is also a report on school improvement grant (SIG) schools and their relative progress across the country, featuring the first two years of cohort data. In general, there has been some improvement, but progress is by no means universal among SIG grantee schools. We are now conducting interviews to try to better understand the factors driving progress or a lack of progress. We will have a final report ready for the fall conference, but preliminary results will likely be available at the July meeting.

Finally, the research materials include information on the upcoming assessment survey. We are mounting a survey of district assessment purposes, processes, and practices, as well as a more in-depth analysis of the assessment landscape in a handful of districts. Casserly called the board's attention to a draft survey, asking for feedback. The Board of Directors was in agreement that the survey would be of great value, and that the organization should move forward.

Achievement Task Force

Eric Gordon gave the report of the Achievement Task Force. This included updates on the NAEP TUDA analysis and the academic KPI project. The task force also reviewed grade-by-grade rubrics to help operationalize the Publishers' Criteria for alignment with the common core. These rubrics link with IMET, but help districts assess in a more indepth way the extent to which materials deal with the standards.

This is just one of a suite of common core implementation tools the Council has worked on, and Casserly praised the work of the Council's academic team.

<u>Professional Development Task Force</u>

Deb Shanley gave the report of the Professional Development Task Force. She announced that we've been moving forward with CAEP, especially standards two and five that look at how we are aligning our work in teacher and leadership programs with the needs of urban districts. Shanley then gave a rundown of district representatives on the CAEP board.

Bilingual Task Force

Gabriella Uro gave the report of the Bilingual Task Force. She described the academic KPI project incorporating the ELL indicators. Also, the organization has received funding from The Gates Foundation and Televisa to help improve instructional materials for ELLs. We are also working on a more detailed rubric for ELL materials following the IMET review.

Finally, a copy of the Spanish version of the ELA Parent Roadmap has been released, and is provided in the board materials.

Leadership and Governance Task Force

Thomas Ahart gave the report for the leadership, management, and governance task force. The task force heard an update from the Council's management services staff on KPI trend data and analysis.

He also summarized a discussion on succession planning in urban districts. The task force did not reach consensus on this issue, but it agreed that it was an important discussion to be having. The board materials also included the latest superintendent survey.

Finally, the Council is exploring the possibility of a joint program with Harvard University to help build the capacity of district and board leaders. There is no update at this time, but we are moving forward with this work.

Finance

No report.

Audit

The final audit report for the period of July 2012 to June 2013 was passed by the executive committee yesterday. Once again, the audit is completely clean, with no findings, exceptions, or material weaknesses. The materials also include a general statement and various documentation of the organization's financial position, including assets and liabilities, investments, activities, grants, etc. Casserly pointed out that the organization appears to have a fairly large cash reserve, which comes from private grants then are then spent down over the course of the next two years.

Casserly also pointed out that the organization has some of its cash reserves in accounts that are not FDIC insured, although they are very stable accounts and the auditor did not have any concerns.

A motion to accept the audit passed by voice vote.

The audit section also provides the Council's budget through December 31, 2013, along with status of dues payments. Overall, the budget is on track to be balanced once again. Casserly informed the group that the organization remains in good financial standing, thanks to the commitment of its members.

The proposed 2014-15 budget is also provided in materials. A motion to accept the proposed budget passed by a voice vote.

By-Laws

Kaya Henderson gave the report of the by-laws subcommittee. In the materials, there is documentation of the change to the Council by-laws. This amendment was voted on at the last meeting of the Executive Committee, and involves the committee reviewing the status of membership dues payments at least once a year, informing nonpaying districts of a suspension in services, and, after two years of nonpayment and at the discretion of the committee, revoking a district's membership status. These districts would then have to reapply to be considered for membership and may be subject to a reinstatement fee.

A motion to accept the change passed by a voice vote.

Membership

The Council has received a membership request from the Hawaii Department of Education. They are a single, statewide school district, and while they see their state functions being supported through their membership in CCSSO, they don't feel their local needs are being covered.

A motion to accept Hawaii as a new Council member passed by a voice vote.

Strategic planning and personnel

No report.

Other/New Business

Meria Carstarphen praised the Council for its assistance with legislative issues, particularly the problem that Austin was having with a local maintenance of effort requirement and the state's interpretation of the federal rules. Group discussion then ensued regarding the value of district membership, and ways to better clarify for districts – especially those behind in dues—the full benefit of membership.

Winston Brooks thanked the Council for a recent audit conducted in Albuquerque, and reminded the group of the value of this service as well.

In closing, Casserly thanked Valeria Silva for her service and leadership as Chair of the Board, and presented her with a crystal gavel.

The Chair adjourned the meeting at 11:55 am.

Respectfully submitted:

Michael Casserly Executive Director

EXECUTIVE COMMITTEE

EXECUTIVE COMMITTEE MEETING LOS ANGELES JULY 25-26, 2014

Friday, January 25, 2014

Present:

Officers:

Jumoke Hinton Hodge, Chair, Oakland School Board Richard Carranza, Chair-elect, San Francisco Superintendent Felton Williams, Secretary/Treasurer, Long Beach School Board Valeria Silva, Immediate Past Chair, St. Paul Superintendent

Members:

Winston Brooks, Albuquerque Superintendent
John Deasy, Los Angeles Superintendent
Lawrence Feldman, Miami-Dade School Board
Eric Gordon, Cleveland CEO
Michael Hanson, Fresno Superintendent
Kaya Henderson, District of Columbia Chancellor
Jumoke Hinton Hodge, Oakland School Board
Deborah Shanley, Brooklyn College, CUNY Dean
Airick West, Kansas City School Board
Craig Witherspoon, Birmingham Superintendent
Terry Grier, Houston Superintendent
Bill Isler, Pittsburgh School Board
Heath Morrison, Charlotte-Mecklenburg Superintendent

Absent:

Jose Banda, Sacramento Superintendent JoAnne Brannon, Metro Nashville School Board Meria Carstarphen, Atlanta Superintendent Keith Oliveira, Providence School Board

Jumoke Hinton Hodge, Chair of the Board of Directors, called the meeting to order at 1:15 pm. Present members introduced themselves and a quorum was established.

Minutes

Jumoke Hinton Hodge presented the minutes of the meeting of the Executive Committee on March 22, 2014, and the March 23 meeting of the Board of Directors at the Legislative Conference in Washington, DC. A motion to approve the minutes passed by a voice vote.

Nominations

Committee and task force appointments for 2014-15 include Felton Williams as chair of the audit subcommittee, Pam Knowles as co-chair of the membership subcommittee, and Kaya Henderson as chair of the by-laws subcommittee.

In addition, Cecilia Adams will join Eric Gordon as co-chair of the achievement task force, Keith Oliveira will join Valeria Silva as co-chair of the bilingual education task force, and Craig Witherspoon and Felton Williams will join Deb Shanley as co-chairs of the professional development task force. The finance task force will retain its current chairs.

Membership

No report.

By-Laws Subcommittee

No report.

Audit Subcommittee

The status of the Council's budget is provided in committee materials. The Committee approved the audit for 2012-13 at the last meeting. The numbers provided in this section are the numbers auditors will be looking at later this fall. The materials also include a general statement of the organization's financial position, investments, and activities.

Michael Casserly, the Council's executive director, explained for new members that the organization appears to have large carry-over amounts, but this is due to the amount of external grants that are offsetting staff salaries. As grants expire, the carryovers will reduce rapidly.

The group then reviewed the status of dues payments. Dues payments have been received by five districts since the materials were finalized. There are currently only four districts in arrears. This includes Little Rock—which has been officially removed from the membership; Shelby County, which is in the midst of transition and is re-engaging its membership; New Orleans, which is permanently waived; and Oklahoma City, which is also undergoing leadership transition and is expected to re-engage in 2014-15.

Executive committee materials also provide a look at the status of the budget compared with last year's budget, and breaks the budget down by various categories, such as function and operations. Materials also detail the organization's investments, including

real gains/losses from those investments, and provide a breakdown of what activities are included in various operational areas of the budget.

Revenues provide details on funds raised from meetings and conferences, funds for the Bernard Harris scholarships, expenditures and revenues from strategic support teams, and special projects—which include a combination of grant funds, such as the Southern Education Foundation grant, the Hewlett Foundation grant, revenues and expenditures for the KPI business plan. Casserly described each grant project and the work it supports.

Casserly informed the group that health coverage costs have increased somewhat, with slightly higher copays for staff. But the organization has been able to maintain benefits at the same level as previous years.

Casserly then covered the tipping point issue—namely, IRS rules that govern the portion of grant funds that a 501(c) 3 can receive from any one foundation. The issue was raised by the Gates Foundation, but the Council's auditors' calculated, using IRS formulas, that the organization was not close to close to any "tipping" point. Council staff decided to build this calculation into its annual audit to make sure the organization had a balanced portfolio.

In sum, the Council is in good financial standing, thanks to the commitment and support of members.

A motion to accept the audit passed by a voice vote.

Annual Report

Committee members received copies of the Council's Annual Report for 2013-14. A motion to accept the annual report passed by a voice vote and congratulated staff on a job well done.

Copies of individual city-by-city membership benefits reports were also distributed. This unique report lays out the services and supports provided directly to district leaders and staff over the course of the program year. In response to a question regarding how member districts compare in terms of their return on investment, Casserly pointed out that the ROI calculation provided in the individual benefits reports do not incorporate the value of many services, such as writing an op-ed. However, the reports do show that some districts take more advantage than others of Council services.

Conferences and Meetings

The 2014 annual conference will be held in Milwaukee. Proposals for presentations have been reviewed. Speakers and venues for the conference have been secured, and information on events is available in committee materials. Milwaukee has been very organized, and participation is likely to be very good again this year.

The group then discussed the location for the next executive committee meeting, and agreed to host the winter 2015 meeting in Duval County, Florida, and the summer 2015 meeting in San Francisco, California.

Valeria Silva shared a proposal from Glenn Singleton to lead the town hall meeting at the annual conference. The group then discussed whether he would be the right person to lead a dialogue in that type of venue. One suggestion was to host a pre-conference session around the black male achievement pledge instead, which would likely be a more appropriate venue for him.

Finally, Casserly informed the group that a number of districts are working on bids to host the 2017 and 2018 annual conferences. The committee can start working on making these decisions at the fall conference, but final choices may spill into January 2015.

Awards

Casserly reviewed the various awards available through the organization—including the Green Garner Award, the Queen Smith Award, and the Shirley Schwartz Award. He informed the group that this year, the Queen Smith Award will be given to a teacher as a way to reorient the program. Applications for all of these awards are available in committee materials.

Communications

Casserly reviewed recent Council press releases, articles, and editorials. The question is always—are we doing what you want us to do in the way you want us to do it? Are we representing membership priorities in our media outreach and work?

In addition to press releases, articles, and editorials, the Council also pursues communications work around the common core, developing high quality tools and materials to support implementation efforts in districts. (The Council recently won a Telly award for its common core public service announcement.) The committee materials include counts on usage of these tools.

The communications section also includes a proposal for a new round of PSAs designed to take on some of the public's concerns around common core standards and assessments. We are fielding a survey of parents in Council districts to test messaging for these PSAs, and the organization is on track to release this PSA to TV and radio stations in early fall. General discussion then followed on the need for other organizations to be more aggressive in their communications efforts.

Casserly then drew the groups attention to another new publication—a "how we help" document that will be another way of detailing our support and services on behalf of urban schools.

The executive committee then discussed the social media contest project that has been in the works for about a year. This project was originally aimed at harnessing word of mouth to shape a positive narrative about urban schools, and to increase engagement and a sense of ownership among teachers, students, parents. A number of companies were approached to sponsor such a project, but their conditions ended up changing the nature of the contest envisioned. A motion to terminate the video contest project passed by a voice vote.

Finally, the Bernard Harris scholarships have been awarded. These scholarships are awarded to students who are graduating from our schools this year and going to college in a STEM field. The number of applications was up this year—perhaps as a consequence of it being the first year we've run the application process online.

The meeting adjourned at 4:00 pm for a break and dinner.

Saturday, July 26, 2014

Legislation

Jeff Simering and Manish Naik gave the report on the Council's legislative activities. Both staff members observed that Congress was in the middle of an election cycle, so everything must be viewed through a political lens. Both parties are introducing "message" bills to help their respective candidates and draw distinctions for the voters, but none are expected to pass except for funding measures. The reauthorization of the Elementary and Secondary Education Act (ESEA) is hardly mentioned, and the renewals of the Perkins vocational education bill and research reauthorizations appear to be stuck. The House passed a status quo charter school bill (twice), and the Senate education committee approved an early childhood bill, but there is little interest in getting it to the floor.

Unaccompanied Minors

All appropriations bills for Fiscal Year 2015 have also stalled at this point. There is no action on the House side, and the Senate is trying to rearrange funding priorities without a funding increase. The administration has also asked for a supplemental appropriations bill to deal with the influx of unaccompanied minors, but there is no education component in the measure. There is also no clear data from the federal government on the numbers of children coming or any indication about whether they would classify these children as refugees, immigrants, etc.

In terms of next steps, there was discussion about moving forward with a survey of Council members. Council staff has been working with districts to estimate the numbers of children we are seeing in our cities, which will help us formulate a strategy in terms of what we need from a federal response, and how to attempt to secure the funds needed.

Early childhood education

Jeff Simering reviewed materials in the committee book, starting with Race to the Top Early Childhood Grants. He explained that the administration has typically attached a large number of requirements to all its bills, including the Early Childhood Grants.

E-Rate

In 2013, the president established the ConnectED initiative, and set goals for broadband and wireless connectivity in schools. The FCC has been undergoing a rulemaking and proposal process in response to the president. Manish Naik explained that the Council has been engaged throughout the rulemaking process and has provided the FCC Commissioners and FCC staff with comments, data, and other information regarding the needs in urban schools. The main issue with E-Rate program changes is funding and how it is targeted on high-poverty schools.

Community eligibility program

The Department of Agriculture continues to release requirements on school meals and the Council's comments are available in the Executive Committee materials. Simering explained that we are commenting and pointing out the extent of the unfunded requirements in the 2010 reauthorization for school meals in order to create some balance in USDA's requirements.

In addition, the new community eligibility program (CEP), which could significantly curtail the paperwork around the program and expand eligibility, could also be a major win for many districts, but some continue to be wary of adopting CEP because the transition from paper applications to direct certification of students could affect the poverty data for our schools. The Council has proposals into both USDA and the Department of Education on the issues.

Waivers

A number of states are currently on the verge of losing their NCLB waivers—primarily for not implementing the required teacher and principal evaluation features. This means that the requirements and regulations of NCLB are back on the table for many, so the Council has encouraged a number of its districts to request separate waivers. Decisions are still pending.

Research

Casserly started the discussion on the Council's research activities. Staff members are working on a number of research projects, including adjusting NCES data in order to pulls our city results from those of public schools nationwide (national public) to get a sense of how our improvement is affecting national gains. We are also working on finalizing a report on the third year of SIG data. Some preliminary data are included in the briefing materials. Discussion followed.

John Deasy, the Los Angeles superintendent, reported on results of a SIG study that LA conducted, and Eric Gordon, the Cleveland CEO, commented on their experience with the program. The group agreed that the importance of this research rested in demonstrating that urban schools can be turned around without the need for closure or handover.

Casserly then gave the group an update on the status of the assessment survey that the board of directors called for at its meeting last fall in Albuquerque. Committee members were urged to make sure that they signaled to their district staff members that completing

this survey is a priority for the board and for the district. This data will help us make some broader judgments about whether as a coalition, or at the individual district level, we want to make some policy changes in this area.

Casserly then updated the committee on the latest developments in the black male initiative. The materials provide a copy of the Council's male of color pledge that was announced by President Obama earlier in the week. The group agreed that we must now move on to operationalizing the commitments made by the districts who signed on to the pledge. Casserly pointed out that the organization's new academic KPIs also incorporate indicators to help us track and determine progress in this area. The group then discussed having a preconference session devoted to the topic in Milwaukee.

Casserly then introduced a preliminary, draft analysis prepared by Ray Hart, the Council's research director, on black male access to Advanced Placement classes. According to the analysis, if member districts focused solely on expanding access for eligible non-enrolled students, it would not significantly narrow participation gaps, suggesting that districts needed to pursue this strategy but also address the pipeline from the earliest grades.

The committee then discussed the evolution and proliferation of charter schools across the country—and what opportunities and challenges this presents. Kaya Henderson, the D.C. school chancellor, provided a number of suggestions about how we might look at issues of flexibility and their differing and similar effects in charters and regular district schools.

Casserly then provided an update on the Council's working group project, and directed the group's attention to an analysis of achievement in the Baton Rouge school system, available in the committee materials.

Achievement

Eric Gordon gave a brief overview of highlights in the Council's work in the area of achievement. The annual curriculum and research meeting just wrapped up, and the organization received very positive feedback so far—particularly noting the strength of the format, the content, and the focus on assessment and instruction.

The Council is currently doing a lot of work to support common core, as well as moving ahead with the development of academic performance indicators and the study of NAEP trends and patterns. In general, the Council's work in supporting the common core has focused on advancing effective outreach and communication, building district capacity, and providing concrete tools and resources. The group received hard copies of the newest common core publication—a booklet that explores the instructional implications for common core of NAEP results.

The committee materials also provide an update on the academic KPI project. Later this fall, the organization is going to test how viable it is to collect leading indicators and cost measures on some of these KPIs.

The committee was then updated on the progress of the common core alignment rubrics project. The Council has embarked on a project funded by the Hewlett Foundation to translate the Publishers' Criteria into grade-by-grade rubrics to help districts determine the alignment of materials to the common core standards. This is meant to be used in conjunction with Student Achievement Partners' IMET tool.

Finally, the Council has recently conducted a strategic support team visit to Buffalo to review its special education program. This report was just released publicly this week, and a copy can be found in the committee materials.

Professional Development

The committee materials include a draft of a potential leadership professional development program with Harvard. In the first part of September there will be a meeting to see how to operationalize the goals of this program. The organization's ultimate intent is to support new superintendents and to build stronger pipelines of staff leading to chief academic and chief finance/operating officers' positions.

The second item in the materials concerns the urban school executive program. This is similar to the proposed work with Harvard, but something the Council designed and maintains on its own. In fact, if the proposed partnership with Harvard doesn't work out, the organization could think about building out this program into the academic area, and possibly other areas.

Finally, Deb Shanley, the dean of Brooklyn College, referred the group to a report released by the American Psychological Association on assessing and evaluating teacher preparation programs.

Bilingual

In Valeria Silva's (superintendent of St. Paul) absence, Mike Casserly provided an update of the Council's work on behalf of English language learners. The ELL section starts with the ELL materials criteria framework. The draft includes an outline of a broad framework for ELD consistent with the common core, including both focused language acquisition as well as cross-content literacy development. In addition, the back half of the document provides criteria for how to assess commercial products for their alignment with the common core and their appropriateness with ELLs.

Taking this project even further, the Council has asked publishers to submit proposals to us describing how they would go about creating materials for ELLs aligned to the common core standards. The organization then provided specific feedback on what they needed to do to meet our expectations and determination that the materials were high quality and aligned, and then gave them the opportunity to pilot test their materials in our districts. Some publishers have dropped out of the effort, but a good number remain.

Finally, the bilingual materials include a survey on unaccompanied minors.

Leadership, Governance, and Management

A copy of the urban superintendents' survey is included in the materials. One interesting finding was that there was marked differences in superintendent pay by gender. An SST report on the food services operations in Boston Public Schools is also included.

Casserly then provided the group with an update on the KPI business venture. The original agreement with TransAct included a minimum level of royalties. The quarterly report shows they have not met their targets. All told, we've made roughly \$70K, which helps underwrite our staff member who works on the KPIs. But this is still far short of their targets.

Finance

The finance materials included information on the award for financial excellence. Atlanta has submitted an application. After a site visit and review, we noted one area of concern. If they make these adjustments, they will be eligible to receive this award.

Materials also include a review of the financial operations of the Indianapolis school system.

Strategic and Succession Planning

The committee materials provide a summary of findings from the Parthenon group project in strategic and succession planning. Winston Brooks, the Albuquerque superintendent, commended Casserly for having several staff members taking on greater responsibilities and roles within the organization. Eric Gordon pointed out that now the executive committee needs to do more concrete planning in the area of succession planning.

Personnel

The executive committee then went into executive session, so the executive director could make his recommendations on staff salaries for 2014-15. In discussing the evaluation of the Executive Director, one member raised the question of whether there was enough information at hand to proceed. Several members questioned how much more information was actually necessary to make a determination of effectiveness. The group reached consensus that the officers of the organization should lead the evaluation process and present their findings to the committee.

All Council staff was then asked to leave the room for the personnel discussion.

The Chair adjourned the meeting at 3:00 pm.

Respectfully submitted:

Michael Casserly Executive Director

ANNUAL REPORTS

ANNUAL REPORT 2013-14

council of the great city schools

ANNUAL REPORT 2013-2014



executive committee 2013-2014

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Chair of the Board

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Ex Officio Deborah Shanley, Brooklyn College CUNY Dean

Cover Photo: Student from Detroit Public Schools Contents Page Photo: Student from Newark Public Schools

Page 3 Photo: Student from Des Moines Public Schools
Page 4 Photo: Students from Albuquerque Public Schools

Page 6 Photo: Student from Boston Public Schools

Page 9 Photo: Student from Dallas Independent School District

Page 10 Photo: Students from Boston Public Schools

Page 23 Photo: Students from Dallas Independent School District

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> Photography by: Alex Jones and Clarence Tabb Jr.

message from the chair

June 30, 2014

The Council of the Great City Schools looks back on a powerful year. This Annual Report provides a fuller picture of our accomplishments – from ensuring that Common Core State Standards are understood and embraced to calling national attention to the tremendous need for racial equity in our classrooms and schools.

Though not always acknowledged in the headlines, great things did happen this year in our large urban school systems. I commend everyone for the hard work and uncounted hours you have put in on behalf of the millions of students we collectively serve.

I don't need to tell you that our work can be difficult. We all need to hear the stories that inspire us as educators and remind us why we do what we do.

Here is one such story:

In the 1960s, Wilma Rudolph was considered the fastest woman in the world. She won three gold medals in the 1960 Summer Olympics in Rome, becoming the first American woman to do so. She achieved this triumph after overcoming polio and growing up as one of 22 siblings in the segregated South.

After her tremendous accomplishments, she had this to say: "Believe me, the reward is not so great without the struggle."

Our member schools are filled with students who, much like Wilma Rudolph, are struggling in one way or another. We, their school leaders, need to be both their anchors and the wind in their sails. We must ground our kids and hold them accountable, and at the same time inspire them to dream of a world beyond what we can imagine. Like any loving family, we offer a safe and caring place where students can discover their very best selves, and where they can prepare for whatever adulthood holds. And we do this amid public discourse ranging from apathetic to downright hostile.



No sector in the nation is better positioned than our Great City Schools to fulfill the promise of the civil rights legislation enacted 50 years ago. Public education can still be – it must be – the great equalizer.

We are not there yet. The struggle is exhilarating and exhausting, and the potential rewards are indeed great. Thank you for fighting the good fight. Keep it up.

Valeria Silva Chair, Council of the Great City Schools Superintendent of Saint Paul Public Schools

message from the director

June 30, 2014

I am pleased and proud to present this annual report to the membership on the activities of the Council of the Great City Schools during the 2013-14 program year.

The Council had an extraordinary year, but it was a year that presented challenges for both the organization and its members. The weak economy continues to rob our schools of badly needed resources; the public debate about the Common Core State Standards has become noisier and more controversial; and everyone had to grapple with an uncertain political landscape locally and nationally. Still, the organization and its members persist in boosting student achievement, improving leadership and management, and strengthening public confidence—the three pillars of our joint efforts.

Singular among the Council's accomplishments this year was the amazing work the organization did in helping its members implement the new Common Core State Standards and inform the public about the promise of these new guidelines. Included in this work is the Council's Public Service Announcement on the common core that has now been seen or heard some 240 million times in both English and Spanish. Our videos, Parent Roadmaps, and other tools are also being used by school districts all over the country. And numerous other meetings, webinars, and Internet tools are helping members get ready for new assessments built around college and career-ready standards.

The Council's crack legislative staff also pulled off a major victory in stopping an amendment to the federal Title I formula that would have stripped the Council's members of some \$550 million. It was a remarkable achievement that no other organization could have possibly accomplished.

The Council also initiated a groundbreaking Pledge for Males of Color that was approved by the vast majority of the membership. The pledge underscored the organization's focus this year on race, language, and culture—issues that were highlighted at the annual town hall meeting moderated by Harvard Law Professor Charles Ogletree.

Moreover, the Council published a new and improved version of its *Managing for Results* report with nearly 500 operational key performance indicators, and launched a new effort to develop parallel academic performance and spending measures that will make this unique tool even more comprehensive.

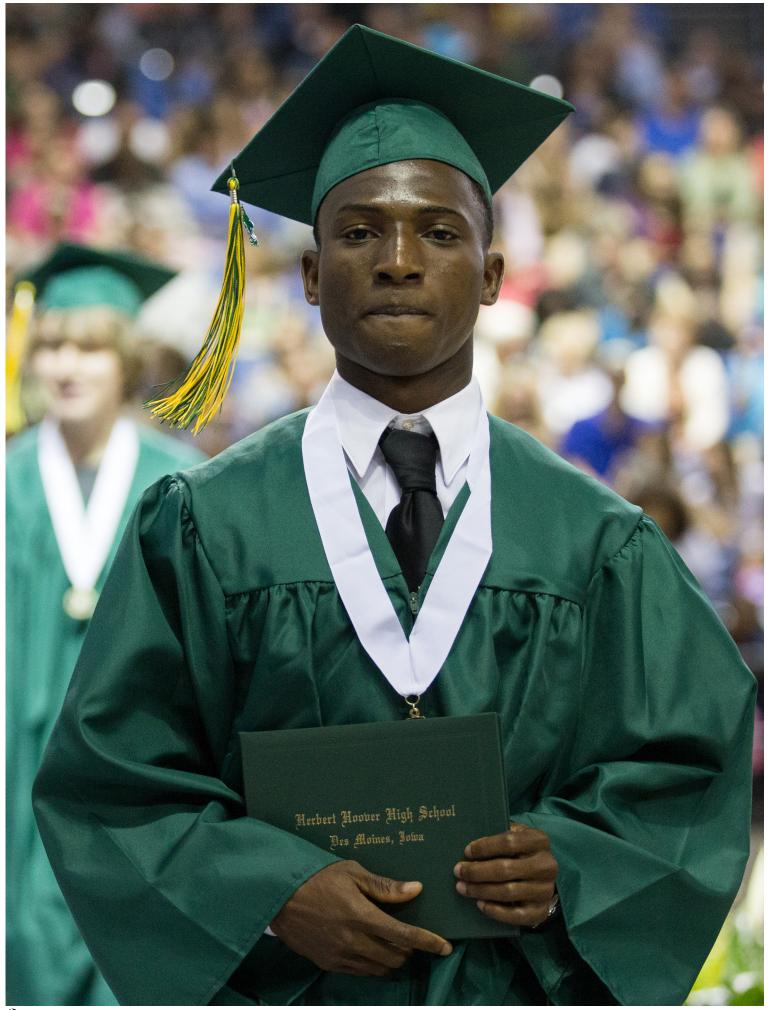
Our annual fall conference in Albuquerque, hosted by the Albuquerque Public Schools, was the best meeting that the organization has ever held, and our spring legislative conference continued to keep the membership informed about key federal legislative and policy issues.

I thank Valeria Silva, superintendent of the St. Paul Public Schools, for her extraordinary leadership in chairing the Council's board of directors this year. Her electrifying speech on race at the Fall Conference brought everyone to their feet and her energy on this issue defined the work of the organization



throughout the year. Finally, I thank the Council's extraordinary staff members who continue to perform at the top of their games on behalf of the membership.

I am very fortunate to be surrounded by such a dedicated team of individuals who work every day with tremendous expertise to serve our urban schools and children. Thank you.



about the council

The Council of the Great City Schools brings together the nation's largest urban public school systems in a coalition dedicated to the improvement of education for children in the inner cities. The Council and its member school districts work to help our schoolchildren meet the highest standards and become successful and productive members of society.

The Council keeps the nation's lawmakers, the media, and the public informed about the progress and problems in big-city schools. The organization does this through legislation, communications, research, and technical assistance.

The organization also helps to build capacity in urban education with programs to boost academic performance and narrow achievement gaps; improve professional development; and strengthen leadership, governance, and management.

The Council of the Great City Schools accomplishes its mission by connecting urban school district personnel from coast to coast who work under similar conditions. Staff with responsibilities for curricula, research and testing, finance, operations, personnel, technology, legislation, communications, and other areas confer regularly under the Council's auspices to share concerns and solutions and discuss what works in boosting achievement and managing operations.

In addition, joint efforts with other national organizations, corporations, and government policymakers extend the Council's influence and effectiveness outside member school districts to the larger, interdependent world that will ultimately benefit from the contributions of today's urban students.

Since the organization's founding in 1956, geographic, ethnic, language, and cultural diversity has typified the Council's membership. That diversity propels the coalition forward to see that all citizens receive an education that will equip them with the skills and knowledge to compete successfully in the world marketplace and to enhance the quality of their lives in a society changing with phenomenal speed. The wellspring of accomplishments and innovations rising from our inner cities testifies to the resounding benefits of investment in the nation's urban centers and in their public schools.





U.S. Secretary of Education Arne Duncan, center, poses with urban school superintendents after meeting with them at the Council of of the Great City Schools' Annual Legislative/Policy Conference in Washington. They discussed issues, challenges, and achievements in big-city school districts.



OUR VISION

Urban public schools exist to teach students to the highest standards of educational excellence. As the primary American institution responsible for weaving the strands of our society into a cohesive fabric, we — the leaders of America's Great City Schools — see a future where the nation cares for all children, expects their best, appreciates their diversity, invests in their futures, and welcomes their participation in the American dream.

The Great City Schools are places where this vision becomes tangible and those ideals are put to the test. We will keep our commitments. And as society supports our endeavors, cities will become the centers of a strong and equitable nation, with urban public schools successfully teaching our children and building our communities.

OUR MISSION

It is the special mission of America's urban public schools to educate the nation's most diverse student body to the highest academic standards and prepare them to contribute to our democracy and the global community.

OUR GOALS

- To educate all urban school students to the highest academic standards.
- To lead, govern and manage our urban public schools in ways that advance the education of our children and inspire the public's confidence.
- •To build a confident, committed and supportive urban community for raising the achievement of urban public schoolchildren.





Los Angeles Superintendent John Deasy and District of Columbia Chancellor Kaya Henderson present information at a session at the Annual Fall Conference.



Kansas City Superintendent Stephen Green and board member Airick West listen intently during a conference session at the Annual Fall Conference.

organizational structure

School districts located in cities with populations over 250,000 and student enrollments over 35,000 are eligible for membership in the Council of the Great City Schools. Membership is also open to those districts serving a state's largest city, depending on its urban characteristics.

The **Board of Directors** is composed of the superintendent and one board of education member from each member district, making the Council the only national educational organization so constituted and the only one whose purpose and membership is solely urban. The board meets twice a year to determine and adopt policies. It elects a 24-member executive committee, which exercises governing authority when the board is not in session.

The board of directors established five special task forces in 1998 and 1999 to address major issues facing the membership. These included a **School Finance Task Force** to explore ways to challenge urban school funding inequities around the nation and an **English Language Learners and Bilingual Education Task Force** to focus on issues around the education of English language learners.

A Task Force on Achievement was established to eliminate gaps in the academic achievement of students by race. A Task Force on Leadership and Governance addresses the increasing concern about issues surrounding urban school leadership and management, and a Task Force on Professional Development explores ways to give teachers and administrators the latest tools and techniques to improve student achievement.

Three subcommittees of the executive committee provide support in financial and organizational areas:

By-Laws: Defines the Council's mission, responsibilities, and composition within the framework of applicable laws and regulations.

Audit: Reviews and studies budgetary matters and ensures that revenues are properly managed.

Membership: Determines eligible cities for membership and recruits, screens, and recommends new members.

In addition to these governing bodies, a network of deans of the **Great City Colleges of Education** and staff liaisons from various school district departments encourage information exchange with counterparts in other cities. Common concerns in areas such as student achievement, public relations, technology, human resources, finance, research, legislation, special education, and curriculum connect urban education personnel from member cities to share the ideas and experiences of the larger group.



characteristics of the great city schools

Total Student Enrollment	7.1 million
Hispanic	39%
African American	31%
White	19%
Asian/Pacific Islander	8%
Alaskan/Native American	1%
Free/Reduced Price Lunch Eligibility	68%
English Language Learners	16%
Students With Individualized Education	
Plan (IEP's)	14%
Total Number of Teachers	414,976
Student-Teacher Ratio	17:1
Number of Schools	12,095



Source: National Center for Education Statistics

conferences

Public Relations Executives Meeting

July 5-8, 2013 San Diego, CA

Curriculum & Research Directors Metting

July 17-20, 2013 Miami, FL

Executive Committee Meeting

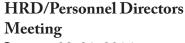
July 19-20, 2013 Long Beach, CA

Chief Financial Officers Conference

September 24-27, 2013 Dallas, TX

Annual Fall Conference

October 30-November 3, 2013 Albuquerque, NM



January 28-31, 2014 Louisville, KY

Legislative/Policy Conference

March 22-25, 2014 Washington, DC

Chief Operating Officers Conference

April 22-25, 2014 New Orleans, LA

Bilingual, Immigrant & Refugee Education Directors Meeting

May 14-17, 2014 Denver, CO

Chief Information Officers Meeting

June 10-13, 2014 Denver, CO

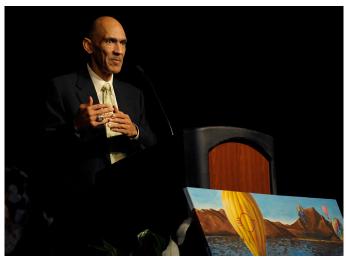
annual fall conference

Nearly 1,000 urban school superintendents, senior administrators, board members and deans of colleges of education from across the country assembled in Albuquerque, N.M., for the Council's 57th Annual Fall Conference, Oct. 30-Nov. 3, hosted by Albuquerque Public Schools.

Under the theme "Urban Education on the Rise," the conference opened with an enlightening address from Valeria Silva, chair of the Council's Board of Directors and superintendent of Saint Paul Public Schools. She urged attendees to challenge their deepest personal beliefs about race and academic expectations and work to break down racial barriers in education in their respective school districts.

Race was also the focus of a lively 90-minute town hall meeting that was moderated by Harvard Law Professor Charles Ogletree Jr., and televised by New Mexico PBS. The town hall not only focused on the topic of race in the nation but also language and culture.

A keynote address was given by David Gergen, a senior political analyst for CNN, who has served as an adviser to four U.S. presidents. Gergen expressed his optimism about the future of education and noted that graduation rates for



Author and former football coach Tony Dungee discusses the importance of education.



Political analyst David Gergen expresses his optimism about the future of education.

students of color are steadily increasing while more schools in urban cities are implementing higher standards.

Urban educators also heard from Tony Dungy, a best-selling author and the first African American coach to win a Super Bowl. Dungy recalled that as a coach his philosophy was to help every player be the best they could be, and stressed to educators to do the same because the success of the country is determined by how well the nation educates its young people.

Also addressing the conference was military veteran, motivational speaker, and leadership expert Consuelo Castillo Kickbusch, who gave an inspirational address on how she overcame poverty and discrimination to become the highest-ranking Hispanic woman in the Combat Support Field of the Army. She believes that all children have the potential to learn and that public education can do it the best.

The nation's big-city leaders also attended numerous breakout sessions focused on issues such as closing the achievement gap, creating effective professional development programs, integrating technology into effective instruction, and improving outcomes for English Language Learners.

legislative/policy conference

Big-city school leaders convened in the nation's capital March 22-25 to discuss legislation, policies and strategies during the Council's Annual Legislative/Policy Conference.

Conferees heard from U.S. Secretary of Education Arne Duncan, who has served as the nation's top education official since 2009.

Duncan told urban educators that after reading the report released by the Education Department's Office for Civil Rights documenting the racial disparities in school discipline policies across the country, he was stunned to find out how many pre-K students are suspended each year.

The former chief executive officer of Chicago Public Schools noted that the school-to-prison pipeline starts with four-year-olds and that the nation will not be able to close the achievement gap until the opportunity gap is closed.

He praised urban educators for challenging the status quo and not making excuses, while boosting academic achievement and implementing teacher and principal evaluations that incorporate not only student learning but reward excellence.

Rep. George Miller (D-Calif.) also addressed the gathering and was presented with a lifetime achievement award for his years of public service.



U.S. Secretary of Education Arne Duncan discusses the opportunity gap.



Congressman George Miller, right, receives the Lifetime Achievement Award from Council Executive Director Michael Casserly.

Miller is retiring from Congress after 40 years as a congressman.

As a member of the U.S. House of Representatives' Committee on Education and the Workforce Committee, Miller was a strong advocate on behalf of urban schools and urban schoolchildren.

Conferees also heard from Rep. Rosa DeLauro (D-Conn.,), a member of the U.S. House of Representatives Education Appropriations Subcommittee, who gave a passionate speech on the importance of education.

The congresswoman noted that the federal government plays a crucial role in helping all children navigate the many obstacles to a good education and that it is the nation's moral responsibility to see that the country's budget reflects the goal of preserving access to opportunity and education.

Also discussing the need to provide access to early education was Deborah Delisle, the assistant secretary of education for elementary and secondary education for the U.S. Department of Education.

She told conferees that the Education Department under President Obama is the first administration that has developed an office of early learning.

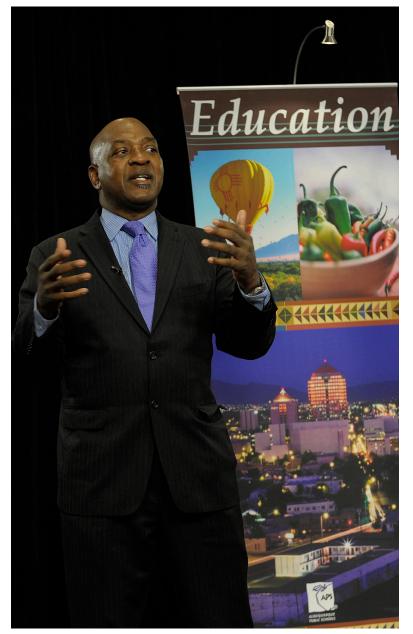




Photo above: Military veteran, motivational speaker, and leadership expert Consuelo Castillo Kickbusch discusses how education helped her overcome poverty and discrimination during her address to urban educators at the Annual Fall Conference.

Left Photo: Harvard Law Professor Charles Ogletree asks a question as moderator of the Council's 90-minute Town Hall Meeting on Race, Language, and Culture at the Annual Fall Conference and televised by New Mexico PBS.



Rep. Rosa DeLauro (D-Conn.) discusses the need for the federal government to adquately fund education at the Council's Annual Legislative/Policy Conference.

COMMUNICATIONS

tives.

COMMICTION
The Council of the Great City Schools works to give the public and the press a balanced and accurate view of the challenges, developments, and successes of urban public schools. In 2013-14, the Council—
☐ Won two prestigious Telly Awards for its public-awareness video explaining how the Common Core State Standard will help students succeed.
□ Published a booklet titled Communicating the Common Core State Standards – A Resource for Superintendents, School Boar Members, and Public Relations Executives.
☐ Aired the Council's Common Core Public Service Announcement (PSA) at two of the nation's most prestigious motor races, the Daytona 500 and Indianapolis 500.
☐ Participated in the release of the 2013 Trial Urban District Assessment (TUDA) results in reading and mathematics ☐ Wrote op-eds in the <i>Boston Globe</i> , Cleveland's <i>The Plain Dealer</i> , the <i>Charlotte Observer</i> and the <i>Milwaukee Journal Sentinel</i> .
☐ Coordinated Comcast <i>Newsmaker</i> interviews with the Council leadership and nine urban school superintendents that aired on CNN Headline News and in designated market areas.
☐ Coordinated a PBS-televised National Town Hall Meeting on "Race, Language, and Culture," moderated by Harvar Law Professor Charles Ogletree, and emphasized issues of race, language, and culture throughout the year.
☐ Fielded inquiries from such national media outlets as the <i>New York Times, Washington Post</i> , CNN, and the Associate Press.
☐ Managed the Council's ExxonMobil Bernard Harris Math and Science Scholarships. ☐ Continued to establish and reinforce relations with the nation's reporters, correspondents, editors, and news executive ☐ Published eight issues of the <i>Urban Educator</i> . ☐ Published the approximation's ApproxIP start.
□ Published the organization's Annual Report. □ Published the 9th survey of Public Relations Offices in the Great City Schools. □ Hosted the 13th Annual Public Relations Executives Meeting.
<u>LEGISLATION</u>
In voicing its proposals and ideas to Congress and other federal policymakers, the Council helps shape legislation t strengthen the quality of schooling for the nation's urban children. In 2013-14, the Council—
☐ Successfully prevented a Title I funding formula change from being offered as a House floor amendment to the ESEA reauthorization bill that would have cut over a half billion dollars from Council member districts.
☐ Provided comments and recommendations to the Senate and House education committees during development of early childhood education, career and technical education, and education research legislation.
☐ Secured Education Department guidance allowing districts to backfill sequestration cuts without violating Title I supplanting requirements.
Submitted comments to the U.S. Department of Education on modified standards and assessments for students wit disabilities, as well as proposed rules on IDEA maintenance of effort provisions.
☐ Provided comments on the Department of Education's Race To The Top Preschool Development Grants.

☐ Promoted access to No Child Left Behind waivers directly to school districts in states that do not participate in waivers. ☐ Initiated discussions with the Education Department on simplifying multi-source funding of local educational initia-

☐ Advocated successfully for more flexible guidance from the Education Department to facilitate urban use of poverty-focused Community Eligibility options for free school breakfasts and lunches.	f the
☐ Submitted comments to the Agriculture Department (USDA) on the Community Eligibility Option (CEO) gram and organized technical assistance for Council districts through meetings and conference calls with USDA states.	_
☐ Assisted member districts during the phase-in of the 2010 Healthy and Hunger-Free Kids Act; submitted comm to USDA on a proposed school meals cost study, personnel standards, and local wellness policies; and conven meeting of the Great City Schools Food Service Directors.	nents
☐ Supported flexibility waivers of school meal regulations in the FY 2014 and FY 2015 appropriations bills.	
☐ Provided multiple comments to the Federal Communications Commission (FCC) on President Obama's Connectinitiative and E-Rate modernization program while supporting targeted program funding. Hosted monthly E-I calls with the Universal Service Administrative Company.	
☐ Convened the Annual Legislative/Policy Conference with four days of briefings and discussions on federal budget appropriations, congressional legislative activity, flexibility waivers, and grant opportunities from the U.S. Department.	
of Education. Served as an intermediary for Council districts in resolving grant problems with the U.S. Department of Education provided multiple legislative updates and alerts on critical issues; and responded to scores of questions on feet the council districts in resolving grant problems with the U.S. Department of Education provided multiple legislative updates and alerts on critical issues; and responded to scores of questions on feet the council districts in resolving grant problems with the U.S. Department of Education provided multiple legislative updates and alerts on critical issues; and responded to scores of questions on feet the council districts in resolving grant problems with the U.S. Department of Education provided multiple legislative updates and alerts on critical issues; and responded to scores of questions on feet the council districts in resolving grant problems with the U.S. Department of Education provided multiple legislative updates and alerts on critical issues; and responded to scores of questions on feet the council districts in the council districts and the council districts in the council districts and the council districts are considered to score of questions of the council districts and the council districts are considered to score of the council districts	
policy, grants, and legislation.	
☐ Fielded requests from Congress for information on common core standards, teacher quality, school improvem funding formulas, technology, special education, bilingual education, school meals, regulatory burden, and other issues to be a sequence of the congress of the c	
<u>RESEARCH</u>	
Timely data collection and analysis allow the Council to prepare comprehensive reports, predict trends, and assess effects of various policies, reforms, and practices on student performance. In 2013-14, the Council—	s the
☐ Initiated a pledge to improve outcomes for males of color in America's Great City Schools that was approved by 60 member districts.	7
☐ Developed a unified and consistent message of urban school improvement based on 10-year results of the Trial University of the Trial University Assessment of NAEP.	rban
☐ Conducted Strategic Support Team reviews on research, deployment, and accountability functions in a number of member districts.	of
□ Published the report Implementing the Common Core Standards: Year Two Progress Report From the Great City Scho	ools.
□Represented urban school district interests at meetings of the American Educational Research Association, the	
Partnership for Readiness for College and Careers (PARCC), the Smarter Balanced Assessment Consortium (SBA	
the National Assessment Governing Board (NAGB), the National Center for Education Statistics (NCES), the	
Coalition of Schools Educating Boys of Color, The White House Domestic Policy Council, The White House	
Initiative on Educational Excellence for African Americans, the Harvard Strategic Data Project Institute for Lea	ıder-
ship in Analytics, and the Educational Testing Service.	
Responded to numerous member requests for statistical information and research assistance.	
☐ Conducted special analysis for member districts of achievement levels, changing demographics, and school imprement.	ove-
☐ Conducted and facilitated a webinar for member districts and other stakeholders on Black male achievement.	
☐ Analyzed student responses to NAEP items that were similar to PARCC and SBAC-released questions. Present results at various meetings of curriculum, research, and ELL staff.	ted

☐ Presented key findings from an analysis of SIG-funded schools in member districts, *The School Improvement Grant*

Program: Performance Indicators for America's Great City Schools.

☐ Published Beating the Odds: Analysis of Student Performance on State Assessments, Results from 2011-2012. ☐ Convened the 2013 annual Research and Curriculum Directors Meeting, in Miami, Florida.
ACHIEVEMENT AND PROFESSIONAL DEVELOPMENT
Improving the performance of all students and closing achievement gaps is one of the Council's most important priorities. In 2013-14, the Council—
□ Created the <i>Calendar of Questions</i> tool to help districts implement the Common Core State Standards. □ Convened virtual meetings of the Council's common core content advisory committees in mathematics and ELA. □ Participated in the Invitational Research Symposium on Science Assessment co-hosted by the K-12 Center at ETS, CCSSO, and the College Board.
☐ Made multiple presentations to organizations on the common core while representing urban districts and their work ☐ Provided feedback to Achieve on the Educators Evaluating Quality Instructional Products Rubric (EQuIP) and to Student Achievement Partners on the Instructional Materials Evaluation Tool (IMET).
□ Collaborated with Achieve to hold a series of webinars on the EQuIP planning process and its student-work protocol □ Developed grade-by-grade rubrics to assist districts in the selection of common core-aligned instructional materials. □ Expanded the content and use of the Basal Alignment, Anthology Alignment, and Read-Aloud Projects. □ Convened a number of workshops and institutes for member districts on implementation of the common core. □ Updated www.commoncoreworks.org to provide access to information and materials on implementing the common
core. Conducted Strategic Support Team reviews on special education, bilingual education, and general education in a number of member districts.
☐ Facilitated two meetings of the Achievement and Professional Development Task Forces.
SCHOOL FINANCE AND LEADERSHIP, GOVERNANCE, AND MANAGEMENT
The Task Forces on School Finance and Leadership, Governance, and Management address the quality and tenure of leadership and management in and the funding of urban schools. In 2013-14, the Council—
☐ Conducted Strategic Support Team reviews for member districts on food services, transportation, and business & finance.
☐ Convened annual meetings of Chief Financial Officers, Human Resources Directors, Chief Operating Officers, Chief of Safety & Security, Food Services Directors, Facilities Directors, Transportation Directors, and Chief Information Officers.
☐ Released the Phase I report from the Deferred Maintenance Working Group.
☐ Published the ninth edition of <i>Managing for Results in America's Great City Schools: A Report of the Performance Measure ment & Benchmarking Project</i> with an expanded set of indicators.
☐ Completed the Council's Urban School Executive Program (C'USE) for aspiring Chief Financial Officers and awarde Certificates of Achievement to two graduates.
☐ Assisted in organizing the U.S. Department of Education's Labor-Management Conference.
☐ Published the report <i>Urban School Superintendents: Characteristics, Tenure, and Salary Eighth Survey and Report.</i> ☐ Fielded numerous member requests for management information.
☐ Facilitated two meetings of the School Finance and Leadership, Governance, and Management Task Forces.

BILINGUAL, IMMIGRANT AND REFUGEE EDUCATION

update their ELL programs to meet the demands of new academic standards.

A merica's urban schools serve unusually large numbers of students whose families have come to this nation to seek a better life. In 2013-14, the Council—

Developed a new framework for English Language Development (ELD 2.0) to guide districts in their efforts to

Developed criteria for the selection of common core-aligned instructional materials for English Language Learners.
☐ Held discussions with the Office of Civil Rights (OCR) and Department of Justice (DOJ) on English Language
Development and the Common Core State Standards (CCSS).
☐ Provided district-specific assistance and guidance on how to respond to and interact with OCR and DOJ on ELL
interventions.
☐ Provided assistance to member districts on ELL-specific accountability metrics for state applications for ESEA waiver renewals.
☐ Co-sponsored professional development for instructional coaches and key staff in member districts to foster academic
discourse in ELL instruction.
☐ In collaboration with TESOL, shared with members findings on the changing role of ESL teachers in the era of
common core.
☐ Maintained strong relations with other organizations supporting the implementation of CCSS, including TE-
SOL, the National Association of Latino Elected Officials (NALEO), the Understanding Language Initiative, and El
Momento by Univision, in addition to closely working with Student Achievement Partners.
☐ Provided feedback to PARCC and SBAC consortia on their guidance documents regarding linguistic accommodations.
☐ Received a grant from The Bill & Melinda Gates Foundation and Televisa Foundation to secure revisions from
publishers to instructional materials for English Language Learners. Secured partnerships with five publishers to
develop or revise instructional materials for ELLs.
Received a planning grant from the Helmsley Charitable Trust to develop professional development tools and supports
for teachers working with students who are below grade level.
☐ Conducted Strategic Support Team reviews for member districts on ELL programming.
☐ Convened the annual meeting of the Bilingual Immigrant and Refugee Education Directors.
☐ Convened two meetings of the Task Force on English Language Learners and Bilingual Education.
ORGANIZATION AND ADMINISTRATION
The Council works to manage its resources and ensure the integrity of its programs. In 2013-14, the Council—d
1
☐ Conducted an internal audit of the organization's 2013-14 spending and received unqualified external audit results for
FY2012-13.
☐ Arranged the Annual Fall Conference in Albuquerque as well as multiple meetings and forums throughout the year.
☐ Continued cleanup of the organization's database system.
☐ Upgraded the online conference registration and hotel reservation system for all meetings.
☐ Managed financials for 13 Strategic Support Team trips, seven grant projects, 10 programs, and 16 conferences and
specialty meetings.
☐ Responded to numerous requests for membership information and assisted membership with hotel and travel arrange-
ments.
☐ Added two new member districts – El Paso and Hawaii.
☐ Managed the Green-Garner Award program and the Dr. Shirley Schwartz Urban Impact Scholarship.

award programs

14.

Richard R. Green

GREEN-GARNER AWARD

During the annual fall conference, the Council bestows the Green-Garner Award upon a past or present member district superintendent or board of education member in recognition of exceptional contributions to urban schools and students. As the nation's highest urban education honor, the award pays tribute to the memory of Richard R. Green, former Minneapolis superintendent and New York City Public Schools chancellor, and Edward Garner, a businessman and former school board president of the Denver Public Schools.



Edward Garner

The award, sponsored by ARAMARK Education and Voyager Sopris Learning, includes a \$10,000 college scholarship to be presented to a senior in the winner's school system or system from which the winner graduated.

Denise Link, school board chair of the Cleveland Metropolitan School District, received the award at the 2013 Fall Conference in Albuquerque. She has chaired the school board since 2009, and in this role she has led the policy body's efforts to transform the school district with academic and fiscal reform plans that have received strong mayoral support and funding from local foundations.



Denise Link (center) holds her \$10,000 oversize check after winning the Green-Garner Award. She is congratulated by Voyager Sopris Learning's Carolyn Getridge, ARAMARK's Dennis Maple and Council Executive Director Michael Casserly.



Cleveland student Yu Zhang, second from left, holds his \$10,000 Green-Garner college scholarship and is congratulated by, left to right, his mom, school board chair Denise Link and principal Irene Javier.

green-garner award winners

1989	W. Harry Davis, Retired Member	Minneapolis School Board
1990	James Griffin, Retired Member Timothy Dyer, Former Superintendent	St. Paul School Board Phoenix Union High School District
1991	Paul Houston, Former Superintendent	Tucson Public Schools
1992	Richard Wallace Jr., Superintendent Emeritus	Pittsburgh Public Schools
1993	Constance Clayton, Superintendent	School District of Philadelphia
1994	Holmes Braddock, Board Member	Miami-Dade County Public Schools
1995	Curman Gaines, Superintendent	St. Paul Public Schools
1996	James Williams, Superintendent	Dayton Public Schools
1997	Maxine Smith, Retired Member	Memphis City School Board
1998	Gerry House, Superintendent	Memphis City Public Schools
1999	Rod Paige, Superintendent Judy Farmer, Board Member	Houston Independent School District Minneapolis Public Schools
2000	Eric Smith, Superintendent	Charlotte-Mecklenburg Schools
2001	Barbara Byrd-Bennett, Superintendent	Cleveland Municipal School District
2002	John Simpson, Superintendent	Norfolk Public Schools
2003	Arthur Griffin, Board Member Franklin Till, Superintendent	Charlotte-Mecklenburg Schools Broward County Public Schools
2004	Tom Payzant, Superintendent	Boston Public Schools
2005	Anna Dodson, Board Member	Norfolk Public Schools
2006	Beverly Hall, Superintendent	Atlanta Public Schools
2007	Elizabeth Reilinger, Board Member	Boston Public Schools
2008	Pascal Forgione, Superintendent	Austin Independent School District
2009	Emmett Johnson, Board Member	Atlanta Public Schools
2010	Arlene Ackerman, Superintendent	The School District of Philadelphia
2011	Candy Olson, Board Member	Hillsborough County Public Schools
2012	Carol Johnson, Superintendent	Boston Public Schools
2013	Denise Link, Board Member	Cleveland Metopolitan School District

Queen Smith Award For Commitment to Urban Education

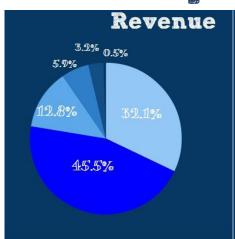
Eric Hines, director of equity and inclusion for Guilford County Schools in Greensboro, N.C., was the recipient of the Queen Smith Award for Commitment to Urban Education. Sponsored by the Macmillan/McGraw-Hill Publishing Co., the award is named in honor of the company's late vice president of urban programs.

Shirley S. Schwartz Urban Education Impact Award

The Council of the Great City Colleges of Education, an affiliate group of deans working with big-city school leaders, presented the fifth annual Dr. Shirley S. Schwartz Urban Education Impact Award to Charlotte-Mecklenburg Schools, the University of North Carolina at Charlotte, and Davidson College for their Charlotte Teacher's Institute, which is designed to strengthen teaching by cultivating leadership skills among Charlotte's public school teachers. The award honors an outstanding partnership between a university and urban school system and is named in honor of the Council's director of special projects who died in March 2009.

financial report

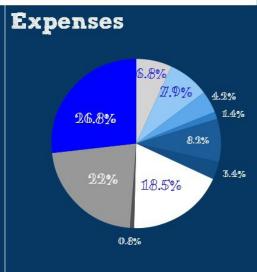
Financial Statement for the year ending June 30, 2014







Preliminary



Report FY12-13	Estimate FY13-14
\$2,521,135	\$2,520,069
1,655,452	3,576,290
1,159,745	1,002,445
462,096	465,343
111,866	248,417
ne 33,967	42,458
142,047	2,701
\$6,086,308	\$7,857,722
	\$2,521,135 1,655,452 1,159,745 462,096 111,866 ne 33,967 142,047

Audited

	Report FY12-13	Estimate FY13-14
Expenses		
Public Advocacy	\$376,057	\$407,470
Legislative Advocacy	454,007	475,882
Research	287,598	251,558
Curriculum & Instruction	85,517	84,626
Executive Leadership	450,485	494,486
Member Management Services	202,054	204,618
Admin & Financial Management	1,003,434	1,111,350
Fundraising Activities	29,576	45,786
Conferences & Meetings	1,174,216	1,319,827
Categorical Projects	2,075,546	1,611,512
Total Expenses	\$6,138,490	\$6,007,114

Audited

Preliminary

Change in Net Assets	(\$52,182)	\$1,850,609	
Net Assets, Beginning	\$7,817,416	\$7,765,234	
Net Assets, Ending	\$7,765,234	\$9,615,843	

sponsors

The Council thanks the following contributors for their support in 2013-2014.

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2013 Chief Financial Officers Meeting

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2013 Annual Fall Conference

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2013 Curriculum & Research Directors Meeting

ARAMARK Education

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2013 Public Relations Executives Meeting

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2014 HRD/Personnel Directors Meeting

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Workday

2014 Legislative/Policy Conference

Televisa Foundation

Houghton Mifflin Harcourt

Knowledge Delivery Systems, Inc.

McGraw-Hill Education

Pearson

Wilson Language Training

Scholastic, Inc.

Schoolwires

2014 Bilingual, Immigrant & Refugee Education Directors Meeting

Benchmark Education Houghton Mifflin Harcourt Imagine Learning Inc.

Knowledge Delivery Systems, Inc.

Lexia Reading

McGraw Hill Education

Santillana USA

2014 Chief Operating Officers Conference

247 Security Acuity Brands AECOM

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JG

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School Specialty
Tyler Technologies

Zonar

2014 Chief Information Officers Meeting

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Lightspeed Systems

Microsoft

Pearson Safari Montage

SchoolMessenger

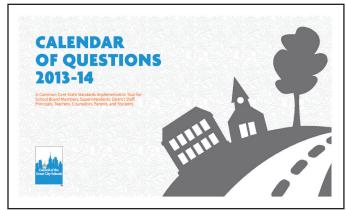
Schoology

Schoolwires

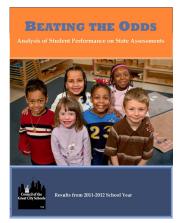
Shirley Schwartz Urban Education Impact Award

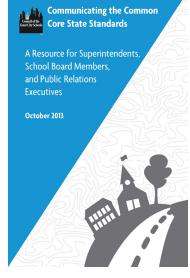
Joseph Schwartz

publications













☐ Beating the Odds: Analysis of Student Performance on State Assessments: Results from 2011-2012 School Year-City-by-City Profiles- Fall 2013

This analysis presents city-by-city assessment results, which are presented year-by-year and grade-by-grade on each state test in mathematics and reading between spring 2009 through spring 2012.

- ☐ Rethinking Leadership: The Changing Role of Principal Supervisors- Fall 2013
 - The Council of the Great City Schools received a grant from The Wallace Foundation to investigate the ways principal supervisors are selected, supported, and evaluated in major school districts across the country, looking specifically at the roles and responsibilities of staff in these positions.
- ☐ Communicating the Common Core State Standards- October 2013

A resource guide to help leaders of the nation's largest urban school districts devise and execute comprehensive communication plans to strengthen public awareness about and support for the common core, as well as new assessments.

☐ Managing for Results in America's Great City Schools- October 2013

An annual publication of the Performance Management and Benchmarking Project, new and improved with correlation analyses and example research questions.

☐ Implementing the Common Core State Standards, Year Two Progress Report- October 2013

The Council of the Great City Schools surveyed the progress urban public school districts are making in implementing the Common Core State Standards. This report presents the results from this second-year survey.

☐ Calendar of Questions 2013-2014- September 2013

A Common Core State Standards Implementation Tool for school board members, superintendents, district staff, principals, teachers, counselors, parents, and students.

council staff

ADMINISTRATION

Michael Casserly, Executive Director
Teri ValeCruz, Director of Administration, Finance & Conferences
Alisa Adams, Finance Manager
Terry Tabor, Conference Manager
Anna Barerra, Accounting & Conference Specialist
Shirley Lathern, Systems & Administration Specialist
Marilyn Banks, Administrative Assistant

COMMUNICATIONS

Henry Duvall, Director of Communications Tonya Harris, Communications Manager Danyell Taylor, Communications Specialist

CURRICULUM AND INSTRUCTION

Ricki Price-Baugh, Director of Academic Achievement Robin Hall, Director of Language Arts and Literacy Denise Walston, Director of Mathematics

LEGISLATION AND POLICY

Jeff Simering, Director of Legislation Manish Naik, Manager of Legislative Services Gabriela Uro, Manager of ELL Policy and Research Debra Hopkins, ELL Project Coordinator Carol Aguirre, ELL Policy Specialist Julie Wright Halbert, Legislative Counsel

MANAGEMENT AND TECHNOLOGY

Robert Carlson, Director of Management Services Jonathon Lachlan-Haché, Special Projects Specialist

RESEARCH

Ray Hart, Director of Research Candace Simon, Research Manager Renata Uzzell, Research Manager Moses Palacios, Research Specialist

SPECIAL PROJECTS

Amanda Rose Corcoran, Special Projects Manager Michell Yorkman, Special Projects Manager



Council Board of Directors and Member Districts 2013-2014 (As of March 2014) **School District** Superintendent **Board Member** Winston Brooks Martin Esquivel Albuquerque Anchorage Ed Graff Natasha Von Imhof Leslie Grant Atlanta Erroll Davis, Jr. Austin Meria Carstarphen Vincent Torres **Baltimore** Tisha Edwards Shanaysha Sauls Birmingham Craig Witherspoon Wardine Alexander John McDonough Boston Michael O'Neill Paul Vallas Bridgeport Kenneth Moales, Ir. **Broward County** Robert Runcie Laurie Rich Levinson Buffalo Pamela Brown Barbara Nevergold Nancy McGinley **Todd Garrett** Charleston Mary McCrav Charlotte-Mecklenberg **Heath Morrison** Barbara Byrd Bennett Jesse Ruiz Chicago **Mary Ronan** Cincinnati Alexander Kuhns Pat Skorkowsky Clark County Stavan Corbett Cleveland **Eric Gordon Denise Link** Gary Baker II Columbus **Daniel Good** Mike Morath **Dallas** Mike Miles Dayton Lori Ward Ronald Lee Denver Tom Boasberg Allegra Havnes **Des Moines Thomas Ahart** Cindy Elsbernd Jack Martin Detroit Karen Ridgeway **District of Columbia** Kaya Henderson N/A Nikolai Vitti Paula Wright **Duval County**

Bernard Taylor, Jr. **David Tatman** East Baton Rouge

El Paso **Juan Cabrera** TBD Fort Worth Walter Dansby Judy Needham Fresno Michael Hanson Lindsay Cal Johnson Maurice Green Rebecca Buffington **Guilford County**

MaryEllen Elia **Candy Olson** Hillsborough County TBD Ronn Nozoe Honolulu Houston Terry Grier Paula Harris **Indianapolis** Lewis Ferebee Samuel Odle

Jackson Cedrick Gray Monica Gilmore-Love **Jefferson County Donna Hargens** Diane Porter

Kansas City (MO) Stephen Green Airick West Long Beach Christopher Steinhauser Felton Williams Los Angeles John Deasy Steve Zimmer Miami-Dade County Alberto Carvalho Lawrence Feldman Milwaukee **Gregory Thornton** Michael Bonds Bernadeia Johnson Minneapolis Carla Bates

Nashville Jesse Register JoAnn Brannon Cami Anderson Antoinette Baskerville-Richardson Newark

New Orleans Stan Smith Woody Koppel

N/A New York City Carmen Fariña

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Oklahoma City Dave Lopez Phil Horning Mark Evans Marian Frey Omaha **Orange County** Barbara Jenkins William Sublette **Palm Beach County** E. Wavne Gent Debra Robinson Philadelphia William Hite Bill Green Pittsburgh Linda Lane William Isler **Portland** Carole Smith Pam Knowles Providence Susan Lusi Keith Oliveira Richmond Dana Bedden **Jeffrey Bourne Bolgen Vargas** Van Henri White Rochester Sara Noguchi Sacramento Christian Prichett Rick Miller **Rob Richardson** Santa Ana St. Louis Kelvin Adams Rick Sullivan Mary Doran St. Paul Valeria Silva San Diego Cindy Marten **Kevin Beiser** Richard Carranza Hvdra Mendoza San Francisco

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washington, d.c.

wichita



SAMPLE INDIVIDUAL CITY REPORT

Benefits and Services

of the

Council of the Great City Schools

in the

2013-14 School Year





Report to the Cleveland Metropolitan School District on the Benefits and Services of the Council of the Great City Schools in the 2013-14 School Year

BENEFITS TO THE CLEVELAND METROPOLITAN SCHOOL DISTRICT

1. Provided Washington's premier and most effective urban education <u>legislative advocacy</u>, resulting in the following additional federal funds to Cleveland in the *2013-14* school year that would not have been available without Council intervention:

•	Title I Targeting	\$9,819,858
•	Title II Targeting	\$493,862
•	IDEA Targeting	\$1,863,872
•	Bilingual Education Targeting	\$367,287

Total Extra for Cleveland Schools in 2013-14: \$12,544,878 \(^{1}\)

Cleveland's Return on 2013-14 Membership Dues:

\$304 return for each \$1 paid in dues.

¹This Total Extra amount does not include the amount of future Title I funds that Member Districts stood to lose had the Council not prevented a Title I formula amendment from being approved in the U.S. House of Representatives. Urban districts in the Council would have lost a total of \$553 million as a result of the formula amendment.

- 2. Provided the following other services directly to **Cleveland** between July 1, 2013, and June 30, 2014—
 - Provided monthly copies of the Council's award-winning newsletter, the *Urban Educator*, to the **Cleveland** CEO, all school board members, and senior staff.
 - Alerted the **Cleveland** CEO Eric Gordon *via* email about an amendment to the ESEA reauthorization (HR 5 the Student Success Act) coming out of the House Education and Workforce Committee that would have reduced the district's federal Title I allocation by about \$9.8 million.
 - Sent talking points and data to the **Cleveland** CEO and school board representative outlining the effects of the Title I amendment on the district.
 - Provided **Cleveland** staff member Michele Pomerantz with talking points and legislative history regarding the proposed Title I formula changes in the U.S. House of Representatives.
 - Worked with the **Cleveland** CEO on a subsequent version of the amendment that was more favorable to the district.
 - Provided the **Cleveland** CEO with information on member cities that had well-integrated business technology solutions that allowed their various business systems (human resources, finance, academic, student information system, teacher/administrator evaluation systems, performance dashboards, data warehouse, etc.) to "talk to each other."
 - Sent the **Cleveland** CEO and chief financial officer information from the U.S. Department of Education on the potential effect of a government shutdown on local school budgets and grants.
 - Awarded **Cleveland** school board president Denise Link with the Council's Richard R. Green Award in Urban Education Leadership. The award resulted in positive press for the school district.
 - Provided technical assistance to **Cleveland** research staff at the 2013 TUDA pre-release workshop.
 - Traveled to **Cleveland** to facilitate a school board retreat on the status of reforms in the school district compared with other city school districts.
 - Provided **Cleveland** CEO Eric Gordon with requested information from other cities on how they structure successful teacher-exit incentive strategies and models.

- Provided **Cleveland** CEO Eric Gordon with requested information on which cities had effective labor management relationships.
- Wrote an op-ed that was published in the *Cleveland Plain Dealer* highlighting the school district's most recent NAEP data and praising district reform efforts.
- Sent the **Cleveland** CEO and school board representative notice that Congress had passed the Consolidated Appropriations Act, the omnibus spending bill that provides funding for federal programs in FY 2014—your 2014-15 school year.
- Sent the **Cleveland** CEO and school board representative a summary of the President's FY2015 education budget request to Congress.
- Included the **Cleveland** CEO in a small off-the-record meeting with Education Secretary Arne Duncan at the March Legislative Conference in Washington.
- Provided the **Cleveland** CEO with an analysis that the Council did comparing preliminarily-released PARCC and SBAC items to NAEP items of similar structure, complexity, and rigor. The *Cleveland Plain Dealer* printed a story on the report.
- Provided the **Cleveland** CEO with requested information from other major urban school systems on their student mentoring programs.
- Provided the **Cleveland** CEO and school board representative a copy of updated guidance developed by the Department of Justice and the Department of Education reminding districts of their obligation under federal law to provide equal educational opportunities to all children.
- Provided the **Cleveland** CEO with requested information from other major urban school systems on efforts to reduce student absenteeism.
- Provided information on professional development opportunities in education policy to **Cleveland** CEO Eric Gordon and Policy and Labor Liaison Michelle Pomerantz.
- Collected data from urban districts nationwide for the Wallace Foundation to inform their investment in principal supervisor reform initiatives six school districts, including **Cleveland**.
- Developed Common Core Public Service Announcements in English and Spanish that were aired by local TV and radio outlets in **Cleveland**.
- Created the *Calendar of Questions*—a tool to support effective collaboration, planning, and monitoring of implementation of college- and career-ready standards—and circulated

it to the **Cleveland** CEO, school board representative, and department staff throughout the district.

- Drafted a guide to *Communicating the Common Core* that identified key messages, audiences, and outreach strategies, and circulated it to the **Cleveland** CEO, school board representative, and communications staff.
- Worked with Student Achievement Partners to launch the Read-Aloud Project (RAP) for the K-2 grade band, convening teams of curriculum experts, English language learning specialists, and special education staff for two days to write text-dependent questions to accompany selected books and to develop guidance for locating, selecting, and evaluating good informational texts. Participants attended either December 12-13, 2013 in Atlanta, Georgia or April 28-29 in Los Angeles, California. Participants from Cleveland included: Elizabeth Nelson and Karen Thompson.
- Participated in planning and facilitating the Labor-Management Collaboration Conference in St. Louis, MO, providing feedback to the **Cleveland** staff team.
- Briefed Cleveland School Board Member Robert Heard on federal legislative issues prior to his attending the National School Boards Association (NSBA) conference, highlighting the difference in policy positions between the Council and NSBA.
- Provided **Cleveland** Chief Human Resources Officer Serena Houston-Edwards with sample copies of employee handbooks from other urban school systems.
- Provided **Cleveland** Food Services Director Regis Balaban with information on salary ranges for food services management positions.
- Provided **Cleveland** Director of Transportation Ann Carlson with information on the advantages and disadvantages of using liquid propane buses.
- Provided **Cleveland** Chief Information Officer Joseph Podach with information on the use of ACDs or district call-trees.
- Nominated **Cleveland** Executive Director of Family and Community Engagement Tracy Hill for *Education Week's* "Leaders to Learn from" parent engagement award, which she won.
- Provided **Cleveland** Communications Officer Roseann Canfora with access to the Public Relations Executives listsery to seek information on rules regarding student cell phone videotaping in schools.
- **Cleveland** staff members accessed the Council's EduPortal system 1 time between July 1, 2013 and June 30, 2014.

- Cleveland staff members accessed the Council's Key Performance Indicators system 85 times between July 1, 2013 and June 30, 2014.
- Posted **Cleveland** job announcements on the Council web site for Director and project support (12 positions) for the Office of Portfolio Planning and Founding Head of School, Cleveland High School for Digital Arts, at the request of the Human Resource Department.
- Carried story on **Cleveland** in the *Urban Educator*: "Cleveland Poised to Transform Schools" (June/July 2013).
- Carried story on **Cleveland** in the *Urban Educator*: "Common Core Standards Take Center Stage As New School Year Begins" (September 2013).
- Carried story on **Cleveland** in the *Urban Educator*: "Cleveland 'Tests' Applicant Attitudes in Teacher Recruitment" (October 2013).
- Carried story on **Cleveland** in the *Urban Educator*: "'Urban Educator of the Year' Honors Go to..!" (October 2013).
- Carried story on **Cleveland** in the *Urban Educator*: "Cleveland Board Chair Named Urban Educator of the Year" (November/December 2013).
- Carried story on **Cleveland** in the *Urban Educator*: "Big-City Schools Show a Decade of Progress on *Nation's Report Card*" (Jan/Feb 2014).
- Carried story on **Cleveland** in the *Urban Educator*: "Harsh Winter Weather Challenges Urban Schools" (March 2014).
- Carried story on **Cleveland** in the *Urban Educator*: "Seven Urban School Leaders Profiled in Annual *Education Week* Report" (April 2014).
- Carried story on **Cleveland** in the *Urban Educator*: "Big-City School Districts Strive to Break the School-to-Prison Pipeline" (May 2014).

3. Individuals from **Cleveland Metropolitan School District** attending Great City School conferences and meetings in 2013-14—

Public Relations Meeting San Diego, CA July 5-8, 2013	Chief Human Resource Officers Meeting Louisville, KY January 28-31, 2014
Roseann Canfora	Staci Vesneske
Curriculum & Research Directors Meeting Miami, FL July 17-20, 2013	Legislative Policy Conference Washington, DC March 20-25, 2014
 Julie Snipes-Rea Karen Thompson Chief Financial Officers Conference 	 Eric Gordon Michele J. Pomerantz Food Services Directors, Security Directors, and
Dallas, TX September 24-27, 2013	Chief Operating Officers Conference New Orleans, LA April 22-25, 2014
 Jaclyn Petty Michael Bowen Annual Fall Conference	 Jerome T. Pratt Joseph Joyce Bilingual & Immigrant Education Directors
Albuquerque, NM October 30-November 3, 2013	Denver, CO May 13-17, 2014
 Christine Fowler-Mack Dakota Williams Denine Goolsby Denise Link Donna Bowen Eugenia Cash Jessica Baldwin Kevin Burtzlaff Larry Johnston Lisa Thomas Lisa M. Farmer-Cole Louise P. Dempsey Luther Johnson Michael Bowen Michael K. Jester Michelle Pierre-Farid Roseann Canfora Serena Houston-Edwards Shaletha Mitchell Trent M. Mosley Willetta A. Milam William Stencil 	• No One

Chief Information Officers Conference Denver, CO June 10-13, 2014	
 Joseph Podach 	
Rosie Herring-Tufts	

GENERAL BENEFITS TO THE MEMBERSHIP

Highlights

- ➤ Warded off a Title I funding formula change from being offered as a House floor amendment to the ESEA reauthorization bill that would have cut over \$550 million dollars from Council member districts.
- ➤ Initiated a pledge to improve outcomes for males of color in America's Great City Schools that was adopted by 60 member districts.
- ➤ Conducted analysis of 10-year results of the Trial Urban District Assessment of NAEP and developed a unified and consistent message of urban school improvement that was covered widely in national press outlets.
- ▶ Played a major role in helping member districts implement the new Common Core State Standards by launching a national Public Service Announcement that has now been seen or heard some 240 million times in both English and Spanish; publishing the guide Communicating the Common Core State Standards; creating rubrics to help districts determine the quality and level of common core alignment of curricular materials; developing and disseminating tools such as the Calendar of Questions to promote strategic collaboration around implementation; convening numerous meetings and webinars; and further developing the resources offered on the commoncoreworks.org website.
- ➤ Published an important new edition of *Managing for Results* that benchmarked the business services of the nation's urban schools using some 500 key performance indicators.
- ➤ Convened the Annual Fall Conference in Albuquerque featuring Tony Dungy, David Gergen, Consuela Kickbush, and Charles Ogletree Jr., along with scores of sessions and workshops on how urban school districts are working to improve student achievement.
- Provided numerous technical assistance teams to member school districts to help improve instruction and operations.

COMMUNICATIONS

The Council of the Great City Schools works to give the public and the press a balanced and accurate view of the challenges, developments, and successes of urban public schools. In 2013-14. the Council—

- Won two prestigious Telly Awards for its public-awareness video explaining how the Common Core State Standards will help students succeed.
- Published a booklet titled *Communicating the Common Core State Standards A Resource for Superintendents, School Board Members, and Public Relations Executives.*

- Aired the Council's Common Core Public Service Announcement (PSA) at two of the nation's most prestigious motor races, the Daytona 500 and Indianapolis 500.
- Participated in the release of the 2013 Trial Urban District Assessment (TUDA) results in reading and mathematics.
- Wrote op-eds in the *Boston Globe*, Cleveland's *The Plain Dealer*, the *Charlotte Observer* and the *Milwaukee Journal-Sentinel*.
- Coordinated Comcast Newsmaker interviews with the Council leadership and nine urban school superintendents that aired on CNN Headline News and in designated market areas.
- Coordinated a PBS-televised National Town Hall Meeting on "Race, Language, and Culture," moderated by Harvard Law Professor Charles Ogletree, and emphasized issues of race, language, and culture throughout the year.
- Fielded inquiries from such national media outlets as the *New York Times*, *Washington Post*, CNN, and the Associated Press.
- Managed the Council's ExxonMobil Bernard Harris Math and Science Scholarships.
- Continued to establish and reinforce relations with the nation's reporters, correspondents, editors, and news executives.
- Published eight issues of the *Urban Educator*.
- Published the organization's *Annual Report*.
- Published the 9th survey of *Public Relations Offices in the Great City Schools*.
- Hosted the 13th Annual Public Relations Executives Meeting.

LEGISLATION

In voicing its proposals and ideas to Congress and other federal policymakers, the Council helps shape legislation to strengthen the quality of schooling for the nation's urban children. In 2013-14, the Council—

- Successfully prevented a Title I funding formula change from being offered as a House floor amendment to the ESEA reauthorization bill that would have cut over a half billion dollars from Council member districts.
- Provided comments and recommendations to the Senate and House education committees during development of early childhood education, career and technical education, and

education research legislation.

- Secured Education Department guidance allowing districts to backfill sequestration cuts without violating Title I supplanting requirements.
- Submitted comments to the U.S. Department of Education on modified standards and assessments for students with disabilities, as well as proposed rules on IDEA maintenance of effort provisions.
- Provided comments on the Department of Education's Race To The Top Preschool Development Grants.
- Promoted access to No Child Left Behind waivers directly to school districts in states that do not participate in waivers.
- Initiated discussions with the Education Department on simplifying multi-source funding of local educational initiatives.
- Advocated successfully for more flexible guidance from the Education Department to facilitate urban use of the poverty-focused Community Eligibility options for free school breakfasts and lunches.
- Submitted comments to the Agriculture Department (USDA) on the Community Eligibility Option (CEO) program and organized technical assistance for Council districts through meetings and conference calls with USDA staff.
- Assisted member districts during the phase-in of the 2010 Healthy and Hunger-Free Kids Act; submitted comments to USDA on a proposed school meals cost study, personnel standards, and local wellness policies; and convened a meeting of the Great City Schools Food Service Directors.
- Supported flexibility waivers of school meal regulations in the FY 2014 and FY 2015 appropriations bills.
- Provided multiple comments to the Federal Communications Commission (FCC) on President Obama's ConnectED initiative and E-Rate modernization program while supporting targeted program funding. Hosted monthly E-Rate calls with the Universal Service Administrative Company.
- Convened the Annual Legislative/Policy Conference with four days of briefings and discussions on federal budget and appropriations, congressional legislative activity, flexibility waivers, and grant opportunities from the U.S. Department of Education.

- Served as an intermediary for Council districts in resolving grant problems with the U.S. Department of Education; provided multiple legislative updates and alerts on critical issues; and responded to scores of questions on federal policy, grants, and legislation.
- Fielded requests from Congress for information on common core standards, teacher quality, school improvement, funding formulas, technology, special education, bilingual education, school meals, regulatory burden, and other issues.

RESEARCH

Timely data collection and analysis allow the Council to prepare comprehensive reports, predict trends, and assess the effects of various policies, reforms, and practices on student performance. In 2013-14, the Council—

- Initiated a pledge to improve outcomes for males of color in America's Great City Schools that was approved by 60 member districts.
- Developed a unified and consistent message of urban school improvement based on 10-year results of the Trial Urban District Assessment of NAEP.
- Conducted Strategic Support Team reviews on research, deployment, and accountability functions in a number of member districts.
- Published the report *Implementing the Common Core Standards: Year Two Progress Report From the Great City Schools.*
- Represented urban school district interests at meetings of the American Educational Research Association, the Partnership for Readiness for College and Careers (PARCC), the Smarter Balanced Assessment Consortium (SBAC), the National Assessment Governing Board (NAGB), the National Center for Education Statistics (NCES), the Coalition of Schools Educating Boys of Color, The White House Domestic Policy Council, The White House Initiative on Educational Excellence for African Americans, the Harvard Strategic Data Project Institute for Leadership in Analytics, and the Educational Testing Service.
- Responded to numerous member requests for statistical information and research assistance.
- Conducted special analysis for member districts of achievement levels, changing demographics, and school improvement.
- Conducted and facilitated a webinar for member districts and other stakeholders on Black male achievement.

- Analyzed student responses to NAEP items that were similar to PARCC and SBACreleased questions. Presented results at various meetings of curriculum, research, and ELL staff.
- Presented key findings from an analysis of SIG-funded schools in member districts, *The School Improvement Grant Program: Performance Indicators for America's Great City Schools.*
- Published *Beating the Odds: Analysis of Student Performance on State Assessments, Results from 2011-2012.*
- Convened the 2013 annual Research and Curriculum Directors Meeting, in Miami, Florida.

ACHIEVEMENT AND PROFESSIONAL DEVELOPMENT

Improving the performance of all students and closing achievement gaps is one of the Council's most important priorities. In 2013-14, the Council—

- Created the *Calendar of Questions* tool to help districts implement the Common Core State Standards.
- Convened virtual meetings of the Council's common core content advisory committees in mathematics and ELA.
- Participated in the Invitational Research Symposium on Science Assessment co-hosted by the K-12 Center at ETS, CCSSO, and the College Board.
- Made multiple presentations to organizations on the common core while representing urban districts and their work.
- Provided feedback to Achieve on the Educators Evaluating Quality Instructional Products Rubric (EQuIP) and to Student Achievement Partners on the Instructional Materials Evaluation Tool (IMET).
- Collaborated with Achieve to hold a series of webinars on the EQuIP planning process and its student-work protocol.
- Developed grade-by-grade rubrics to assist districts in the selection of common corealigned instructional materials.
- Expanded the content and use of the Basal Alignment, Anthology Alignment, and Read-Aloud Projects.

- Convened a number of workshops and institutes for member districts on implementation of the common core.
- Updated www.commoncoreworks.org to provide access to information and materials on implementing the common core.
- Conducted Strategic Support Team reviews on special education, bilingual education, and general education in a number of member districts.
- Facilitated two meetings of the Achievement and Professional Development Task Forces.

SCHOOL FINANCE AND LEADERSHIP, GOVERNANCE, AND MANAGEMENT

The Task Forces on School Finance and Leadership, Governance, and Management address the quality and tenure of leadership and management in and the funding of urban schools. In 2013-14, the Council—

- Conducted Strategic Support Team reviews for member districts on food services, transportation, and business & finance.
- Convened annual meetings of Chief Financial Officers, Human Resources Directors, Chief Operating Officers, Chiefs of Safety & Security, Food Services Directors, Facilities Directors, Transportation Directors, and Chief Information Officers.
- Released the Phase I report from the Deferred Maintenance Working Group.
- Published the ninth edition of *Managing for Results in America's Great City Schools: A Report of the Performance Measurement & Benchmarking Project* with an expanded set of indicators.
- Completed the Council's Urban School Executive Program (C'USE) for aspiring Chief Financial Officers and awarded Certificates of Achievement to two graduates.
- Assisted in organizing the U.S. Department of Education's Labor-Management Conference.
- Published the report *Urban School Superintendents: Characteristics, Tenure, and Salary Eighth Survey and Report.*
- Fielded numerous member requests for management information.
- Facilitated two meetings of the School Finance and Leadership, Governance, and Management Task Forces.

BILINGUAL, IMMIGRANT AND REFUGEE EDUCATION

America's urban schools serve unusually large numbers of students whose families have come to this nation to seek a better life. In 2013-14, the Council—

- Developed a new framework for English Language Development (ELD 2.0) to guide districts in their efforts to update their ELL programs to meet the demands of new academic standards.
- Developed criteria for the selection of common core-aligned instructional materials for English Language Learners.
- Held discussions with the Office of Civil Rights (OCR) and Department of Justice (DOJ) on English Language Development and the Common Core State Standards (CCSS).
- Provided district-specific assistance and guidance on how to respond to and interact with OCR and DOJ on ELL interventions.
- Provided assistance to member districts on ELL-specific accountability metrics for state applications for ESEA waiver renewals.
- Co-sponsored professional development for instructional coaches and key staff in member districts to foster academic discourse in ELL instruction.
- In collaboration with TESOL, shared with members findings on the changing role of ESL teachers in the era of common core.
- Maintained strong relations with other organizations supporting the implementation of CCSS, including TESOL, the National Association of Latino Elected Officials (NALEO), the Understanding Language Initiative, and El Momento by Univision, in addition to closely working with Student Achievement Partners.
- Provided feedback to PARCC and SBAC consortia on their guidance documents regarding linguistic accommodations.
- Received a grant from The Bill & Melinda Gates Foundation and Televisa Foundation to secure revisions from publishers to instructional materials for English Language Learners. Secured partnerships with five publishers to develop or revise instructional materials for ELLs.
- Received a planning grant from the Helmsley Charitable Trust to develop professional development tools and supports for teachers working with students who are below grade level.

Report to the Cleveland Metropolitan School District

- Conducted Strategic Support Team reviews for member districts on ELL programming.
- Convened the annual meeting of the Bilingual Immigrant and Refugee Education Directors.
- Convened two meetings of the Task Force on English Language Learners and Bilingual Education.

ORGANIZATION AND ADMINISTRATION

The Council works to manage its resources and ensure the integrity of its programs. In 2013-14, the Council—

- Conducted an internal audit of the organization's 2013-14 spending and received unqualified external audit results for FY2012-13.
- Arranged the Annual Fall Conference in Albuquerque as well as multiple meetings and forums throughout the year.
- Continued cleanup of the organization's database system.
- Upgraded the online conference registration and hotel reservation system for all meetings.
- Managed financials for 13 Strategic Support Team trips, seven grant projects, 10 programs, and 16 conferences and specialty meetings.
- Responded to numerous requests for membership information and assisted membership with hotel and travel arrangements.
- Added two new member districts El Paso and Hawaii.
- Managed the Green-Garner Award program and the Dr. Shirley Schwartz Urban Impact Scholarship.

CONFERENCES AND MEETINGS

COUNCIL OF THE GREAT CITY SCHOOLS 2014 Conference Schedule

Executive Committee Meeting

January 24 & 25, 2014 The Westin Hotel, Birmingham, AL

HRD/Personnel Directors Meeting

January 28-31, 2014 Brown Hotel, Louisville, KY

Legislative/Policy Conference

March 22-25, 2014 Renaissance Mayflower Hotel, Washington, DC

Chief Operating Officers Conference

April 22-25, 2014 Loews Hotel, New Orleans, LA

Bilingual Directors Meeting

May 14-17, 2014 Magnolia Hotel, Denver, CO

Chief Information Officers Meeting

June 10-13, 2014 Westin, Denver, CO

Public Relations Executives Meeting

July 11-13 2014 Renaissance Hotel, Baltimore, MD

Curriculum & Research Directors' Meeting

July 23-26, 2014 Loews Hollywood Hotel, Los Angeles, CA

Executive Committee Meeting

July 25-26, 2014 Loews Hollywood Hotel, Los Angeles, CA

Annual Fall Conference

October 22-26, 2014 Hilton Milwaukee City Center, Milwaukee, WI

Chief Financial Officers Conference

November, 11-14, 2014 Sheraton Hotel/ New Orleans, LA

COUNCIL OF THE GREAT CITY SCHOOLS 2015 Conference Schedule

Executive Committee Meeting Jacksonville, FL

January 2015

HRD/Personnel Directors Meeting

February 4-6, 2015 Sonesta Hotel, Ft. Lauderdale, FL

Legislative/Policy Conference

March 14-17, 2015 Renaissance Mayflower Hotel, Washington, DC

Chief Operating Officers Conference

April 2015 St. Louis, MO

Bilingual Directors Meeting

May 13-16, 2015 Westin Hotel, Charlotte, NC

Chief Information Officers Meeting

June 2015

Public Relations Executives Meeting

July 10- July 12, 2015 Nashville, TN

Curriculum & Research Directors' Meeting

July 2015

Executive Committee Meeting

San Francisco, CA July 2015

Annual Fall Conference

October 7-11, 2015 Hyatt Regency, Long Beach, CA

Chief Financial Officers Conference

November, 2015

FALL CONFERENCE 2015

COUNCIL OF THE GREAT CITY SCHOOLS

59th ANNUAL FALL CONFERENCE

Hosted by the LONG BEACH UNIFIED SCHOOL DISTRICT Long Beach, CA

OCTOBER 7 - 11, 2015

CONFERENCE HOTEL:

Hyatt Regency Long Beach 200 South Pine Avenue Long Beach, CA 90802 (562) 491-1234

OVERFLOW HOTEL:

Hyatt The Pike Long Beach 255 Bay Street Long Beach, CA 90802 (562) 432-1234

GROUP RATE: \$215/night for Single and Double Occupancy Plus 15.1% tax

Long Beach is California's 5th largest city and Southern California's newest coastal destination. Attractions include: the Queen Mary, the Aquarium of the Pacific, Long Beach Museum of Art and the Museum of Latin American Art.

A fun and fast way to get around Long Beach is by AquaBus and AquaLink. These water taxis offer visitors enjoyable transportation to some of the prime spots within the city. AquaBus is a bright red ferry with capacity to 49 passengers, while AquaLink is a bright yellow catamaran for as many as 79 passengers.

Downtown Long Beach's Passport Shuttle is designed to provide a direct connection between Pine Avenue retail and restaurant district and Long Beach Convention Center, Aquarium of the Pacific, Queensway Bay and Shoreline Village waterfront destinations. Shuttles run between these locations as often as every ten minutes, every day.

Surrounding airports include: Long Beach airport; LAX airport; Orange County/John Wayne Airport; and, Ontario Airport.

The Hyatt Regency Long Beach is right next door to the Convention and Entertainment Center where some of the meetings will be held during the conference. The hotel has 528 stylish guestrooms all with water views. It also has 22,000 square feet of function space. From the hotel you can take a stroll along the harbor or play on the beach. It is only steps from major attractions, shops, restaurants and entertainment.

FALL CONFERENCE 2016

COUNCIL OF THE GREAT CITY SCHOOLS

60th ANNUAL FALL CONFERENCE

Hosted by the MIAMI DADE COUNTY PUBLIC SCHOOLS Miami, FL

OCTOBER 19 - 23, 2016

CONFERENCE HOTEL:

InterContinental Miami Hotel 100 Chopin Plaza Miami, FL 33131 (305) 577-1000

GROUP RATE: \$235/night for Single and Double Occupancy
Plus 13% tax

InterContinental Miami Hotel is a 4-star hotel with 641 elegant guestrooms and suites, all of which are equipped with the latest technological features including flat panel TVs and hi-speed internet access. A dramatic marble exterior leads into a newly restyled lobby showcasing an eighteen foot Sir Henri Moore Sculpture that soars towards the sky.

The InterContinental Miami is a waterfront property situated on Biscayne Bay. The 103 Club InterContinental rooms with private club lounge on the 29th floor boasts of a breathtaking panoramic views of the city. The hotel's multiple food and beverage options include two outlets: acclaimed Chef Richard Sandoval's Toro Toro Restaurant and Bar which offers Pan Latin steakhouse featuring small sharing plates and Latin spirits in the hotel's interactive lobby lounge, and Olé Restaurant offering a la carte and gourmet breakfast. By the pool is Blue Water and exclusive dining outside Toro Toro kitchen is the Chef's Table 40. Starbucks is also located in the lobby.

The hotel is just 7.5 miles from Miami International Airport, and just minutes away from Port of Miami. It is 1 mile to the Shops of Mary Brickell Village, 1.5 miles to Adrienne Arsht Center for the Performing Arts, 10 minutes to South Beach, and 5 miles to the Art and Design Districts. It is also walking distance from Miami's most exclusive restaurants, Bayside Marketplace and the American Airlines Arena, home to the Miami Heat.

LETTERS FROM PROSPECTIVE HOST CITIES FOR THE 2017 ANNUAL CONFERENCE

BALTIMORE CITY PUBLIC SCHOOLS

Stephanie Rawlings-Blake Mayor, City of Baltimore Shanaysha M. Sauls, Ph.D.
Chair, Baltimore City Board of
School Commissioners

Gregory E. Thornton, Ed.D. Chief Executive Officer

September 15, 2014

Council of the Great City Schools 1301 Pennsylvania Avenue Suite 702 Washington, DC 20004

Members of the Host City Selection Committee:

We welcome the opportunity to submit the enclosed proposal for Baltimore to host the 2017 Annual Fall Conference of the Great City Schools. As a longstanding member of the Council of the Great City Schools, and the winner of the 2010 CUBE Award for Excellence in School Board Governance, Baltimore City Public Schools is uniquely suited to host this annual gathering. Of equal importance, Baltimore is nationally recognized as one of the premier tourist destinations on the East Coast, hosting more than 30 million visitors each year to the city's world famous Inner Harbor.

The Baltimore Convention and Visitors Bureau, in collaboration with Visit Baltimore staff and every level of city government, has the experience and resources to support every aspect of the Council's needs and the commitment to ensure that the Annual Fall Conference is a success. The Baltimore Convention Center boasts 300,000 square feet of contiguous exhibition space and 85,000 square feet of meeting space in 50 meeting rooms, all directly connected to the 750-room Hilton Baltimore. Most important, the Convention Center sits squarely in the middle of Baltimore's Inner Harbor, surrounded by unmatched educational, cultural and entertainment attractions, a wide range of restaurants, and 8,500 additional hotel rooms within easy walking distance.

Baltimore City Public Schools has been recognized for the district's ongoing, progressive commitment to urban education reform, partnership with unions, and our historic program to transform schools and neighborhoods across the city through our \$1.1 billion 21st Century Buildings Plan. At the same time, City Schools has the capacity to assist in the organization of meeting events and provide educational programs of national interest to conference attendees. In summary, Baltimore City Public Schools and the City of Baltimore will collaborate to make the 2017 Annual Fall Conference a memorable, enjoyable, productive gathering for the nation's top urban educators.

Thank you for your serious consideration of our proposal. Please don't hesitate to contact the office of the Baltimore City Board of School Commissioners if you need any additional information.

Sincerely,

Shanaysha Sauls, Chair Baltimore City Board of School Commissioners

Gregory E. Thornton, Ed.D. Chief Executive Officer

- Thanton



Eric S. Gordon Chief Executive Officer

1111 Superior Avenue E Cleveland, Ohio 44114 clevelandmetroschools.org

Chief Executive Officer Eric S. Gordon

Board of EducationDenise W. Link
Board Chair

Louise P. Dempsey Vice Chair

Ericka Abrams Anne E. Bingham Robert M. Heard, Sr. Shaletha T. Mitchell Stephanie Morales Willetta A. Milam Lisa Thomas, Ph.D.

Ex Officio Members Ronald M. Berkman, Ph.D. Alex Johnson, Ph.D. Michael Casserly Executive Director Council of the Great City Schools Suite 702 Washington, D.C. 20004

Dear Michael:

One of the highlights of the year for us and for our entire board and senior leadership team is our attendance at the Council of the Great City Schools annual conference. After traveling throughout the country each year to enjoy numerous conferences in other great city schools, we can think of no higher honor than to be selected to return the favor as host to our colleagues in 2017.

We have put together what we hope will be a persuasive appeal for urban educators and others to travel to the great city of Cleveland, where our city is alive with activities for our colleagues to enjoy.

I hope you will agree that it's time to return to Cleveland to see the transformation of our city school district and the revitalization of our city, especially our lake and vibrant public square that will be the hub of activity for the 2017 conference.

The materials included in our proposal provide only a glimpse of all that Cleveland has to offer to our education colleagues, their staff and their families.

Thank you for the opportunity to bring the 2017 CGCS conference to Cleveland!

Sincerely,

Eric S Gordon

CEO

Denise W. Link

= W. Link

Board Chair

MEMBERS OF THE BOARD

LOS ANGELES UNIFIED SCHOOL DISTRICT

DR. RICHARD A. VLADOVIC, PRESIDENT TAMAR GALATZAN MÓNICA GARCÍA BENNETT KAYSER DR. GEORGE J. MCKENNA III MÓNICA RATLIFF STEVEN ZIMMER



Administrative Office 333 South Beaudry Avenue, 24th Floor Los Angeles, California 90017 Telephone: (213) 241-7000 Fax: (213) 241-8442

JOHN E. DEASY, Ph.D. SUPERINTENDENT OF SCHOOLS

September 12, 2014

Michael Casserly Executive Director Council of the Great City Schools 1301 Pennsylvania Ave., N.W. Suite 702 Washington, D.C. 20004

Dear Michael:

The Los Angeles Unified School District submits this letter to request consideration by the Council of the Great City Schools for the City of Los Angeles to serve as the host site for your Fall 2017 Annual Conference. Los Angeles contains exceptional amenities for visitors, and is home to the nation's second largest school district, serving students who speak more than 100 different languages. Conference participants would have the opportunity to learn about LAUSD's pioneering reforms, which have achieved remarkable outcomes and guided educational practice throughout the country.

Los Angeles is America—only sooner. LAUSD was the first Californian school district to ban suspensions for "willful defiance," and one of the first American municipalities to establish a \$15 minimum wage. After the implementation of the Deferred Action for Childhood Arrivals (DACA) program, LAUSD developed a centralized process for records requests that was later modeled by districts across the country. Los Angeles has also been a leader in the national effort to implement a 21st Century curriculum; LAUSD has cultivated educators' capacities to teach the Common Core State Standards and created a system-wide plan for 1:1 technology access. Additionally, LAUSD has been a pioneer in public school choice, having authorized more charter schools than any other district.

Los Angeles leads not only in reforms, but also in results. In 2013, LAUSD produced the highest gains for students of color on the National Assessment of Educational Progress (NAEP) among all urban school districts. That same year, Los Angeles students won the United States Academic Decathlon, granting our district its 14th national title, the most held in the country.

The Los Angeles Unified School District welcomes the opportunity to learn from the Council of Great City Schools conference attendees. We appreciate your consideration and look forward to collaborating on a successful event.

Sincerely,

ohn E. Deasy, Ph.D.

Superintendent of Schools

Richard A. Vladovic, Ed.D.

Board President

Administrative Offices

VanHoose Education Center P.O. Box 34020 Louisville, Kentucky 40232-4020 (502) 485-3011



September 4, 2014

Mr. Michael Casserly
Executive Director
Council of the Great City Schools
1301 Pennsylvania Avenue, NW Suite 702
Washington, DC 20004

Dear Mr. Casserly:

On behalf of the Jefferson County Public School (JCPS) District, I am very excited to submit this proposal to the Council of the Great City Schools to host the 2017, 2018, or 2019 Annual Fall Conference. The attendees will experience our city's unique brand of southern hospitality, spirit, and excitement that has made it one of the top visitor and meeting destinations in the world. From our thriving independent arts and restaurant scene to our world-famous museums and attractions, Louisville is sure to surprise and delight. Partnered with us, we can assure you the Annual Fall Conference will be a huge success!

With JCPS, we fully support the mission of the Council of Great City Schools which states, "It is the special mission of America's urban public schools to educate the nation's most diverse student body to the highest academic standards and prepare them to contribute to our democracy and the global community." With more than 14,000 full-time employees including more than 6,400 teachers, we have the capacity to successfully host a national conference. With more than 4,900 business partnerships, and a very engaged, active public education foundation, we are confident that we can garner extensive community support for this event.

Hosting a conference in Louisville provides a great opportunity to share JCPS' journey to becoming the best urban district in the nation, as well as sharing learning and best practices with other large, urban districts around the country. The city of Louisville has many cultural attractions including Churchill Downs, Slugger Museum and Factory, Muhammad Ali Center, Kentucky Center for the Arts, Kentucky Science Center, Waterfront Park, and many more that would be of great interest to conference attendees, as well as their families.

We appreciate the opportunity to share the many great things that make Louisville such a wonderful community and JCPS such a great, urban school district. We look forward to your response to our proposal, and do not hesitate to contact us if you have any questions or need additional information.

Sincerely,

Donna M. Hargens, Ed.D.

Superintendent

DMH:scf

www.jcpsky.net

Eta al Opportunity/Altimetive Action Employer Offering Casal Educations Opportunitet

Diane Porter



Jefferson County Board of Education—District 1
VanHoose Education Center
3332 Newburg Road
P.O. Box 34020
Louisville, Kentucky 40232-4020
(502) 485-3566
porterschoolboard@gmail.com

September 5, 2014

Michael Casserly
Executive Director
Council of the Great City Schools
1301 Pennsylvania Avenue, N.W., Suite 702
Washington, DC 20004

Dear Mr. Casserly:

It is my pleasure to write a letter in support of the proposal being submitted to the Council of Great City Schools (CGCS) by the Louisville Convention & Visitors Bureau (LCVB) in collaboration with the Jefferson County Public School (JCPS) District to host the Great City Schools Fall Conference in 2017, 2018, or 2019.

As Chairwoman of the Jefferson County Board of Education, I am excited for the potential opportunity to partner with the Council of Great City Schools to host a conference which focuses on educating the nation's most diverse student body to the highest academic standards and prepare them to contribute to our democracy and the global community. As a large, diverse, urban district, our Board is committed to this same goal as evidenced in our vision, "All JCPS students graduate prepared to reach their full potential and contribute to our society throughout life."

Hosting a conference in Louisville provides a great opportunity to share JCPS' journey to becoming the best urban district in the nation, as well as sharing best practices with other large, urban districts around the country. The city of Louisville has many cultural attractions including Churchill Downs, Ed Hamilton (sculptor) Public Works, Muhammad Ali Center, Kentucky Center for the Arts, Kentucky Museum of Art and Craft, Kentucky Science Center, Louisville Slugger Museum and Factory, and many more that would be of great interest to conference attendees, as well as their families. With more than 14,000 full-time employees, JCPS has the staff capable of assisting with this conference.

We fully support the CGCS continuing to lead the effort to meet the challenge of educating all children to prepare them for work and life. We look forward to sharing all the wonderful things in our community and the great things happening at Jefferson County Public Schools.

Sincerely,

Diane Porter

Chairwoman, District 1

DP:scf

LEGISLATION

	E-RATE	

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	WC Docket No. 13-184
Modernizing the E-rate)	
Program for Schools and Libraries)	CC Docket No. 02-6
)	

COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

The Council of the Great City Schools is pleased to submit comments to the Further Notice of Proposed Rulemaking, as adopted by the Federal Communications Commission on July 11, 2014 (WC Docket No. 13-184, CC Docket No. 02-6), regarding meeting the future funding needs of the E-Rate Program, as well as other simplification issues for schools and libraries.

Introduction

The Council of the Great City Schools appreciates the hard work undertaken by the Commission and staff over the past year in developing the original Notice of Proposed Rulemaking (NPRM) in 2013, this year's Public Notice, and July's Report and Order and the accompanying Further Notice of Proposed Rulemaking (FNPRM). We are encouraged by this last document's inquiry into the need for additional funding, and continue to offer input to assist the Commission's decision-making.

As stated in the Notice, the financial support the E-Rate has helped many schools be a part of the immense technological advancements our society has seen in the last 15 years, and provided educators with access to modern communications that they may not have been able to obtain otherwise. However, strengthening the E-Rate program and continuing this success cannot occur without additional investment in our schools, specifically in the next-generation broadband and high-speed wireless that is necessary to make classrooms "future-ready."

The Council of the Great City Schools includes 67 of the nation's largest urban school districts that represent less than one-half of one percent of the approximately 14,000 school districts in the U.S., yet enroll almost 7 million students, including approximately 25 percent of the nation's Hispanic students, 30 percent of the nation's African American students, and 25 percent of the nation's children living in poverty. The value of the E-Rate is apparent every day to the members

of the Council, as we serve the highest numbers and concentrations of disadvantaged children, employ the largest number of teachers, and operate in the greatest number of outdated and deteriorating buildings.

The Council supports the goals outlined in the Administration's ConnectED initiative, and remains eager to help the Commission convert the laudable proposal into effective policy. As the president has often said, our nation has an interest in improving our schools to make sure America has the skills needed to expand opportunities, grow our economy and compete in the international marketplace. In urban school districts, this means making sure that our students and teachers learn and work in safe, secure and modern classrooms that prepare graduates for college and careers after their K-12 experience.

The Council sees the ConnectED initiative as an opportunity to expand the E-Rate to provide additional benefits to schools and help them with the kind of innovative changes urban districts want to make, like online assessments and computer adaptive testing, interactive instruction, blended learning, and 1:1 computing practices. The President's original announcement sought to help districts make these practices a reality by getting the necessary next-generation broadband and high-speed wireless in 100% of schools by the end of five years. The Report and Order focused the program's existing resources on wireless deployment, but eliminated support for other existing services, shifting a significant financial burden onto district budgets and potentially putting the broadband targets out of reach.

In these proceedings, we once again urge the Commission to consider a permanent increase in the funding cap to help further the nation's progress towards the ambitious goals laid out by the President. The comments we have provided over the past year have tried to preserve the focus on schools with the greatest numbers and concentrations of poor children, while helping the Commission address the need to update the program and improve efficiency. But efficiencies and service changes are not sufficient for the E-Rate to meet the necessary technology needs throughout the country, and our comments will provide examples that demonstrate the demand for additional funding that still exists in urban schools.

Impact of Insufficient Funding for the Program

As the Commission is aware, current E-Rate funding is inadequate for the neediest applicants, let alone everyone else in the country. We understand that part of the Commission's intent this past year has been to gather more information and get a clearer picture of the full cost of modernizing the program and connecting all schools to high-speed broadband. Since the program's inception, however, there has been a resounding and overwhelming call from the applicant and provider community to raise the E-Rate's cap and add more money to the program. The original \$2.25 billion cap resulted from an outdated and inadequate analysis in the 1990's, and simply did not account for the need that existed or the pervasive technology usage that was headed to schools and libraries.

Since the annual E-Rate limit was first set, subsequent requests to increase funding were routinely rejected, even as annual requests for reimbursements exceeded the original cap. Almost

two decades have passed with very little funding increases for inflation, reducing the purchasing power of the scarce E-Rate funds over the years. In this same period, student and teacher demand for high-tech learning accelerated exponentially, and the gap between what applicants needed and what the E-Rate could support grew even larger. This shortfall is compounded even further by the fact that state and local education aid has declined significantly as a result of the lagging economy. A 2013 study by the Center for Budget and Policy Priorities actually found that state funding for education is currently below the levels that schools received in 2008.

As a result of this disparity, applicants did the best they could with the money that was available from the program, and from within their own finances, to update classrooms, school buildings, and district networks. The varied and contrasting level of broadband speeds in schools today is a direct result of the uneven and inadequate history of support for technology in education. The variation in school district broadband capacity is no different in urban schools. Some districts may be at or close to the short-term goals, but no city school systems meet the long-term connectivity guidelines adopted in the Report and Order, and many have a lot of work to do in order to reach the approved targets.

Bandwidth Targets and Costs

In the Report and Order, the FCC adopted the SETDA target recommendation of Internet access for schools of at least 100 Mbps per 1,000 users in the short term, and 1 Gbps Internet access per 1,000 users in the longer term. The Commission adopted as a target for WAN connectivity schools that have a connection capable of providing a dedicated data service scalable to the SETDA long-term WAN target of 10 Gbps per 1,000 students.

A number of urban school systems provided us with information regarding their current status and ability to meet these benchmarks, and as discussed above, district "readiness" differs, as does the associated costs with meeting the targets.

Internet Access Targets

Some urban districts are close to the short-term benchmarks, and additional funding could help ensure they can continue to work towards the long-term goals set out by the Commission. One such district indicated that all of their schools were at the short-term goal, while none of their 7 high schools meet the long-term goal. Another district indicated that almost all of their schools met the short-term targets, but none (approximately 100 schools) met the long-term goal. A similar reply came from a district that seemed confident they could meet the short-term targets, but none of that district's 200 schools were ready for the 1 Gbps goal.

Quite a few districts, however, still have more work to do on both targets for Internet access, and as is often the case in urban school systems, the number of sites involved adds up quickly. One district indicated that only their elementary schools met the target of 100 Mbps per 1,000 users, but none of their approximately 60 middle schools or 60 high schools met the short-term target. In that same district, none of the schools – over 300 sites total – are equipped with 1 Gbps per 1,000 users. Another large district assessed their Internet access and found approximately 400

schools – almost half of the district – are not at the short-term target. None of that district's schools are at the long-term target.

Internet Access Costs

The size of the district, the number of schools, and the distance to the benchmarks are obviously significant factors in determining how much funding a district would need to reach the Commission's goal. One district indicated that their 70 schools were currently at 50MB per 1,000 students, but based on their own monitoring of bandwidth usage, the district projected that between \$500,000-\$1 million would be a sufficient annual amount (pre-discount) to meet the benchmarks for Internet access. These figures are lower than the projected costs estimated by most urban districts, however.

A number of similarly sized districts (with an average of 100,000 in student enrollment) had estimates for meeting the short-term benchmarks of about \$2-3 million annually. The same districts had a range of \$2 million to \$14 million in cost estimates for their schools to meet the long-term targets. There were a few districts that had significantly higher estimates, which stretched from between \$20-100 million. Many districts explained that additional work or additional costs would be required to meet the long-term targets, increasing the cost for reaching the 1 Gbps benchmark. These costs include upgrading the district's core, network, and infrastructure. Another district explained that their costs could increase by a factor of 10 in the absence of using shared municipal fiber and microwave connectivity.

Wide Area Network (WAN) Targets and Costs

None of the districts that provided us with bandwidth information have any schools equipped at the SETDA WAN target of 10 Gbps per 1,000 students. A number of districts have existing fiber to their schools that is capable of being scaled-up to 10 Gbps, but require additional funding for the network electronics and infrastructure costs. Many more districts will require significant infrastructure work and will incur major costs to get fiber connections to their sites that are capable of meeting these benchmarks.

For school sites with fiber networks that are scalable to 10 Gbps, one district estimated that beyond the necessary electronics upgrades, it would cost approximately \$4,800 per month per school, or approximately \$58,000 per year for 10 Gbps. This school district has just over 100 schools, and the annual cost would be about \$5.8 million. A smaller district estimated the equipment upgrades would cost just under \$2 million, but was unsure of the monthly/annual costs. Another district anticipated that just upgrading their core electronics, including 10 Gbps optics, would cost approximately \$80,000 per school.

Two districts, both operating between 150-200 school sites, stated that they did not have connections capable of providing dedicated data service of 10 Gbps, and estimated the one-time costs to do so would reach between \$25-30 million. Finally, one district felt they had so much work to do that they were not confident estimating the total costs for upgrading their network, but felt that updating the core would cost \$8-10 million alone.

At a time when our nation's educators are attempting to raise academic standards for all students, the variance among schools and districts to handle the demands of modern instruction is stark.

We anticipate that regardless of the source of the comments – urban, rural, and suburban – the Commission will find in this rulemaking that significant increases in E-Rate funding are necessary to ensure that these disparities do not continue to grow.

It is also worth noting that the lack of sufficient funds in the E-Rate program will have an impact on both Categories of funding. In the Report and Order, the Commission made significant changes to speed the deployment of wireless connectivity within schools, but also stipulated that extreme demand on Category 1 broadband services would reduce the funding available for wi-fi reimbursements under Category 2. Raising the cap will ensure that funds will be available to make all of the necessary upgrades and will reach those needing to make technology improvements in either category.

Category 2 and WI-FI

The Council appreciates the opportunity provided in the FNPRM to offer input on the \$150 perpupil amount adopted for internal connections in the Report and Order. As the Order itself stated, costs for wi-fi deployment can be significantly higher in urban schools, yet for many of the poorest city school districts, the reimbursements available through the E-Rate have been reduced to 85%. Urban school systems that already have significant wi-fi systems in place indicated that the \$150 per-pupil allocation for Category 2 might be sufficient to keep their access layer current, pay for maintenance costs, or upgrade old wireless systems. But paying for all three over the next five years, or attempting to deploy wireless throughout dozens or hundreds of the nation's oldest school buildings typically exceeds the amount approved by the Commission.

Overcrowded classrooms are common in urban schools, with up to or more than 40 students, and sometimes two access points must be installed to ensure stability. In many urban schools, the condition of facilities and the construction materials used in the nation's oldest sites also has an impact on density needs. The cost of routers can also be higher in urban areas since schools with thousands of users need enterprise-class routers to ensure stable and secure access to the network. In some parts of the country, a school's outside and assembly areas are used for instructional time and need to be covered, also increasing the per-student amount.

There are additional factors in urban schools that can drive up the costs beyond the \$150 amount. Most major cities have labor stabilization agreements, mandating the wages paid to all contractors and workers, as well as the terms, conditions and costs on public projects. Due to the age of urban schools, installation projects have routinely higher costs because workers must be certified and insured to work in buildings with lead and asbestos. Despite the popular notion that cities have an abundance of service providers, many urban schools also see prices go up on major projects due to a limited pool of bidders. Finally, some cities and school districts have approved tougher radio frequency exposure standards, which also results in higher costs.

The result of these factors leads to an increase in costs for internal connections in urban areas, as the Commission found itself. One Council district with 50,000 students enrolled in 100 school sites received bids in 2013 for a subset of schools, and was able to project a district-wide cost of about \$30 million to install wireless service. This equals about \$600 per-student (pre-discount).

Another district estimated a similar cost of approximately \$700 per-pupil, based on a 30 students-per-classroom assumption. One district stated that the \$150 amount was sufficient for two years, but that the five-year estimate for deploying, maintaining, and upgrading wireless networks to cover their entire school system was closer to \$400 per student. A number of urban districts had estimates in this \$300-400 range, including one that recently completed their district-wide wi-fi installation for approximately \$325 per-student.

The importance of providing students and teachers with wireless access to district networks is well known to the education community and the Commission, and these services were made a priority in the Report and Order. But the funding that was determined for these internal connections and maintenance will be inadequate for urban schools, and will hinder the progress that important E-Rate stakeholders must make in order to modernize classroom instruction.

National School Lunch Program Data

The Council appreciates the changes made in the Report and Order to recognize the new reimbursement mechanism called the Community Eligibility Program (CEP). In our 2013 comments, the Council had urged the Commission to allow schools to use the CEP level of poverty (after the multiplier has been included). One of the main reasons that schools elect to participate in CEP is to get a more efficient account of the poverty level of their students in order to identify those in need of subsidized meals for the National School Lunch Program (NSLP).

This more up-to-date count of the poverty level in schools is also why we oppose the Commission's proposal requiring all schools and libraries to calculate their E-rate discounts using NSLP information that is reported by their state agency. In some states, this information may be recent and districts are satisfied with basing their E-Rate applications off of the state data. In a small number of urban districts, there is limited fluctuation in school enrollment on an annual basis, and the inclusion of year-old data is acceptable for planning and application purposes.

However, there is a reason why some schools and libraries choose not to use state-reported NSLP data when calculating their discount rates. In urban areas, poverty enrollment levels can fluctuate significantly from one year to the next, due to high levels of homeless and transient students, public housing patterns, gentrifying neighborhoods, the creation of non-district charter schools, and even the establishment of immigrant settlement zones. These kinds of factors are outside of a school district's control, and when combined with district decisions regarding opening or closing specific schools, result in major changes in an individual school's poverty level from year to year. This current school year, many urban school districts experienced major enrollment and poverty increases because of the influx of unaccompanied minors that have been reunited with families in local cities.

As the Commission noted, state poverty information is typically one year old, but a number of districts indicated that their states do not meet the November deadline and districts are forced to use even older data. One example from this year: a state did not have NSLP worksheets available until February 12, 2014, and the deadlines for posting Form 470s and Form 471s was February

26th and March 26th, respectively. The state's timeframe for releasing information would not provide applicants with sufficient time to accurately plan, procure, contract, and apply for E-Rate services. As a result, districts had to use data from the previous year's worksheets in order to meet the program's deadlines, even though this data included students that had graduated and schools that had been closed, and did not include new students that had enrolled for the first time throughout the districts.

Because of the enrollment changes that are common in urban schools, and the problems or delays that may occur when relying on state-approved data, the Commission should continue to allow districts the option to use more recent information for their E-Rate applications. Many districts have and will continue to use the state-reported and verified information. The recent inclusion of CEP data in the E-Rate program may also help states speed up their review process and increase the amount of "pre-verified" data that USAC receives. But many districts prefer to use the best available data to implement their technology plan and better serve the population enrolled in their schools, even if doing so results in additional review from USAC.

Finally, we would like to note that USAC proposed this same NSLP data change for E-Rate applications a few years ago. At that time, Council staff and a number of urban districts met with the Commission to outline all of the above concerns, and in the end, no change was made. We believe the FCC recognized there was a need to balance both the verification responsibilities of the Administrator and the districts' desire to include the most accurate number of vulnerable students. We ask the Commission to ensure that balance is preserved in this proceeding.

Conclusion

As one of the E-Rate program's most dedicated stakeholders and supporters, urban public schools appreciate the opportunity to provide input on the Commission's Further Notice of Proposed Rulemaking. The E-Rate allows city school districts to access the benefits of digital learning, and the program has helped many students and schools – regardless of income or location – integrate technology, media, and information-rich instructional content that is a necessary part of contemporary education. The President's call to deploy high-capacity wireless and broadband to all students, teachers, and schools is a sound investment for our nation, and one we wholly support. We also share the Commission's sense of urgency, and underscore that both action and significantly increased funding is needed immediately to meet the president's goals. We must not waste this opportunity to make sure all students can benefit from modern instruction and learn in classrooms that mirror the technology-prevalent world beyond the school walls.

Respectfully Submitted,

Michael D. Casserly, Executive Director Council of the Great City Schools

Email to FCC Staff Regarding Poverty-based Targeting of Reimbursements

From: Manish Naik

Sent: Monday, July 07, 2014 3:12 PM

To: Patrick.Halley@fcc.gov; Michael.Steffen@fcc.gov

Cc: Jeff Simering Subject: E-Rate order

Patrick and Michael:

Thanks for your outreach efforts and the information you provided about the draft order. We continue to have concerns about both the availability and source of the additional \$3 billion for Wi-Fi in upcoming years, as well as improving the underlying connectivity to school buildings which is not being addressed in the proposed order.

As you know, there are two other major concerns for the Council, and we feel the Commission may be able to target funds in a more equitable manner than the draft order currently does.

- 1) Doubling of the costs of P2 for the highest poverty schools, while preserving the same 80% discount rate for lower poverty settings (note that 50% FRPL is just above the national FRPL poverty average); and
- 2) Prohibiting groups of schools from applying separately for P2, rather than under a district-wide application, which is particularly inequitable for States that have organized into larger (cost-effective) geographic school districts, such as county-wide districts in the Southeast or States with large school jurisdictions like Texas. States with school districts serving smaller communities, townships, hamlets, and burgs benefit from the higher concentration of poverty in contrast with large geographic school districts serving multiple communities in many States.

Potential Way to Improve the Targeting in Both Cases:

Allow applicants that are eligible for a district-wide 80% discount to increase their discount rate to 85% for eligible expenditures, but only in their schools with 75% or more FRPL eligibility. Individual schools below 75% FRPL would remain eligible at the 80% district-wide eligibility.

This approach effectively retains the efficiencies of the LEA (district-wide) application, while providing an additional discount increment of 5% to incentivize expanding access in the highest poverty schools – and maintains the historic E-Rate focus on providing the greatest benefits to the nation's highest poverty schools.

Thanks again, and feel free to let us know if you have any questions.

Education Groups Letter to the Federal Communications Commission (FCC)

June 20, 2014

Dear Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai and O'Rielly:

We, the undersigned organizations representing the intended education beneficiaries of the E-rate Program, write to express our appreciation to the Federal Communications Commission (Commission) for addressing E-rate Program modernization to help support 21st century teaching and learning. With a united voice, we write to express our strong concerns with proposed changes we believe will only dilute an already over-subscribed E-rate Program by threatening the program's sustainability and historically successful track record and failing to meet the needs of urban, rural and low-density populated areas.

First, we are extremely concerned about the sustainability of the E-rate Program in response to learning of the Commission's intent to implement a five year \$5 billion plan to invest in Priority II Wi-Fi connections. While the Commission has reprogrammed \$2 billion in existing funding for the first two years, we have serious concerns about the Commission's plan and ability to fund years three through five absent a permanent increase in the funding cap. While nominal savings may be realized by eliminating legacy services and implementing additional efficiencies, we believe they will not add up to an additional \$3 billion. Without investing additional money, the only remaining funding source for the five-year Wi-Fi connections plan would be Priority I and we cannot support raiding Priority I funds – resources beneficiaries depend upon to help meet their ongoing, monthly costs for broadband connectivity – to support Wi-Fi.

Second, we are concerned about the Commission's intent to change the existing funding structure for Priority II to a per-pupil formula allocation for schools (and per square-foot for libraries), even if done within the existing discount matrix. The proposed per-pupil method assumes "one-size-fits-all" costs for all E-rate applicants – no matter a school's enrollment (e.g. whether 12 or 1,000 students), or geographic location (e.g. rural, suburban, urban). We believe a per-pupil allocation grossly oversimplifies the variance in costs and purchasing power.

We strongly believe that the E-rate Program must continue to distribute funds in an equitable way, based on need (calculated by level of poverty and locale), and not by a formula that will water down support for all areas. Moving away from a need-based method by incorporating a per-pupil allocation erodes the equitable distribution of E-rate funds as well as our ability to ensure funds reach those it was designed to help: those schools, libraries and communities most in need.

We believe any effort to modernize the E-rate Program must include increasing the E-rate funding cap. Capped since its inception, having only received inflationary adjustments since 2010, the E-rate Program is vastly underfunded. Our nation's schools and libraries are struggling to meet 21st century broadband connectivity needs with 1998 dollars. Demand for the E-rate

Program is now more than double the funding available. While we do not support a per-pupil distribution model for funding Wi-Fi connectivity, we do believe that an adjustment to the cap would provide additional funding to invest in the Commission's proposed five-year Wi-Fi connections plan. In addition, a cap adjustment would help meet Priority I demands moving forward and support the continued sustainability of the Program. We cannot wait any longer to address the critical need for additional, sustained E-rate funding.

Our letter is uniquely on behalf of education organizations representing E-rate beneficiaries. We know first-hand the tremendous, positive impact the E-rate has had in our classrooms and schools. Without the E-rate, many of our schools would not be able to sustain on-going access to the Internet. We welcome the opportunity to continue to work together to implement those modernizations that will improve high—speed broadband connectivity and capacity while also ensuring the program's successful commitment to equity and long-term sustainability are not upended in the process. Our country's ability to prepare our students in our schools and classrooms to compete in 21st century global economy is in all our hands. Let us not rush into make significant structural changes for the sake of modernization and risk jeopardizing the entire E-rate Program.

Sincerely,

AASA, The School Superintendents Association
American Federation of Teachers
Association of Educational Service Agencies
Council of the Great City Schools
International Society for Technology in Education
National Association of Elementary School Principals
National Association of Federally Impacted Schools
National Association of Secondary School Principals
National Catholic Educational Association
National Education Association
National PTA
National Rural Education Advocacy Coalition
National Rural Education Association

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)
) WC Docket No. 13-184
Modernizing the E-rate)
Program for Schools and Libraries) CC Docket No. 02-6
)

REPLY COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

The Council of the Great City Schools is pleased to submit reply comments to the Public Notice seeking focused comments on modernizing the E-Rate Program for schools and libraries, released by the Federal Communications Commission on March 6, 2014. (WC Docket No. 13-184, CC Docket No. 02-6).

Introduction

The Council of the Great City Schools appreciates the opportunity to provide reply comments to the Commission's Public Notice on E-Rate Modernization. The Council includes 67 of the nation's largest urban school districts, which enroll over 7 million students, including approximately 25 percent of the nation's Hispanic students, 30 percent of the nation's African American students, and 25 percent of the nation's children living in poverty. School districts in the Council collectively serve the nation's highest numbers and concentrations of disadvantaged children, employ the largest number of teachers, and operate in the greatest number of outdated and deteriorating buildings.

As we stated in our original submission, we feel that sufficient evidence has been provided to the Commission in thousands of comments over the program's life and through the annual demand for reimbursements to support a significant increase in the funding cap. The comments submitted during this rulemaking process are no different, as the single unifying theme is the need for additional E-Rate funding. Stakeholders from all education settings shared our position: reform is an important part of the E-Rate program, but the FCC must increase the amount of money available to fuel the overhaul and build upon the successes of the program. An increase in the annual funding cap is needed to help schools maintain their current operations, spur increased broadband capacity, and further the nation's progress towards the ambitious goals laid out by the president.

Like others, we stressed that an increased annual cap is the only realistic way the Commission will meet the needs of all students in this country, both poor and non-poor. In the absence of additional funding, there was also strong support for continuing the E-Rate's focus on the poorest schools.

Focusing on the Poorest Communities

Historically shallow resources for inner city education have been helped with E-Rate reimbursements, but the job of wiring schools, deploying broadband, and modernizing the urban classroom is not nearly finished. Significant gaps still exist between urban schools and the average American school when it comes to technology, academic performance and funding equity. We remain concerned about insufficient funding, especially when coupled with proposals to create "widespread access" to E-Rate support. As we outlined in our original comments and references to legislative history, the E-Rate program was not created to serve all, but to target the most disadvantaged schools and libraries.

This focused perspective was voiced not only by the Council, but also by the Education and Libraries Networks Coalition (EdLiNC), a group comprised of organizations representing school districts throughout the nation, as well as teachers, principals, parents, libraries, and independent schools. The comments from this broad coalition echoed our concerns about the potential for diluted funding, and also referenced the fact that the foundation of the program is built on targeting funding to the needlest applicants. EdLiNC stated, "We assert the continuing vitality and importance of the E-Rate's focus on equity and poverty in distributing support and urge the Commission to maintain those key values as it modernizes the program." These comments were not the first time EdLiNC has cited the importance of the program's original intent. As the Commission began this process in 2013, the coalition's comments sought to, "remind the Commission that the goal of universal service was not to provide equitable resources to every school and library in the nation."

The Council is not a member of the EdLiNC coalition, but endorses their comments enthusiastically. We also highlight the joint comments submitted by the American Association of School Administrators (AASA) and the Association of Educational Service Agencies (AESA), organizations representing thousands of education leaders, mostly from rural and suburban areas. Despite the physical differences between our urban school district members and their rural ones, our two sets of comments both stressed the importance of keeping the program focused on the poorest communities and schools. AASA and AESA offered, "The E-Rate program was designed to connect schools and libraries on the basis of concentration of poverty, not fund individual children. Title I of the Elementary and Secondary Education Act (ESEA) is, like E-Rate, a program that allocates its funds in a manner designed to offset the effects of concentrated poverty."

Both urban and rural schools have significant technology needs, and as the pace of digital learning increases, the E-Rate's original goal of prioritizing funding for the poor and disadvantaged is more important than ever. Any changes made by the Commission must preserve this priority to ensure that the highest poverty schools throughout the country can not only

continue to keep their classrooms running, but also begin the delivery of essential next-generation education services, such as content-rich media, participation in online state assessments, blended learning, computer adaptive testing, individualized student learning objectives, and 1:1 computing practices.

Access to Funding

As we stated in our comments to the Public Notice, the Council appreciates the flexibility the Commission is exploring during its review of the E-Rate program. In terms of access to funding, however, we repeat our claim that a significant increase in the annual cap is the most appropriate way to provide funding for all schools in the nation. If the cap is not increased, the Public Notice's suggested options to widen access to funding do little to promote the equity intended in the Telecommunications Act. Putting the poorest schools and districts on hold during a five-year cycle, or asking applicants to wait through rotating eligibility, is not a sound policy for targeting poverty. Moreover, it has not proven to be an effective method for applicants seeking reliable funding sources for implementing a technology plan.

In either the rotating or once-in-five-years eligibility options, school districts serving high concentrations of disadvantaged students could face lengthy interruptions in their work to improve learning conditions for the beneficiaries intended by Congress. The ineffectiveness of such an approach was explained by the Chicago Public Schools (CPS), in comments submitted jointly with the city's Mayor and public library system, in stating, "...for large districts like CPS, upgrading requires flexibility and phasing of work across multiple funding years ... Limiting an applicant's ability to receive funding for internal connections to a single funding year until all other applicants have received support or declined the opportunity to seek funding will create uncertainty around requests and would drive schools and libraries to inflate their original requests."

Urban school systems were not the only ones rejecting such proposals. There are over 10,000 schools and more than 6 million students attending public schools in California, and both of these figures exceed 10 percent of the nation's respective totals. The state's Department of Education serves approximately 1,200 school districts, almost half of which (578 local educational agencies) are classified as either Rural or as Distant or Remote Towns by the National Center for Education Statistics (NCES). In their comments, the California Department of Education did not support the on/off funding cycles, expressing, "concerns about the predictability of the rotating eligibility approach. All districts have adaptive test requirements, and many districts have significant technological needs. These districts cannot wait for merely a chance at P2 funding in the next 2-3 years. They need to know with certainty before long-term budgets are drafted whether they can rely on federal funds to help equip their 21st century classrooms. If this model is used, it will decrease the predictability of the funding."

Even supporters of these proposals have doubts about such systems. The State E-Rate Coordinators Alliance supported the rotating eligibility option, yet still felt the need to, "point out some concerns that would need to be addressed should the FCC decide to proceed with this option." The Department of Public Instruction in Wisconsin supported the 1-in-5 approach, but

also had one major caveat when they stated, "The condition where applications at 60%, 50%, etc., will be rolled over into the following years appears to introduce some complexity and uncertainty. But it is important to emphasize that this rollover *only becomes necessary if there is not sufficient funding*." The inadequate funding level is just one of the underlying concerns that urban schools expressed about these proposals, in addition to the delay, complexity, and uncertainty it will also add to the program.

The initial commenters to the Public Notice also consistently expressed apprehension about converting the E-Rate into a formula program, regardless of whether such an approach was actually called a formula, a block grant, budget, or funding cap. In our comments to the Public Notice, we reiterated our concerns with this approach, for a number of reasons that a broad array of stakeholders also shared and which the Commission is well aware. But we also acknowledged the Commission does have the ultimate decision to move the program in that direction. In these reply comments, we repeat our strong suggestion that any formula that is considered by the Commission be based not on the number of students in a school, but rather on the number of poor students.

In the Public Notice, the Commission proposed the following formula as a potential approach:

Available Support =

Greater of $\{Per-Student\ Allocation\ x\ Number\ of\ Students\ x\ Discount\ Rate\ Per-Building\ Allocation\ x\ Number\ of\ Buildings\ x\ Discount\ Rate$

We don't think that any calculation that includes "Number of buildings" should be part of the E-Rate, as poverty is not a factor, and further compounds the fact that elements such as the school's enrollment size, age of the facility, or number of classrooms are disregarded. In order to ensure that a formula like the one above focuses funding on schools serving the disadvantaged and poor, we would calculate Available Support based on the "Number of Poor Students" rather than simply the "Number of Students." This type of data point, when applied to the poverty-based discount rate, would help to ensure targeted E-Rate support for our nation's most disadvantaged schools.

Another possibility for the Commission would be to use an existing federal formula, such as the Title I funding distribution developed by Congress and used by the U.S. Department of Education. In the Title I formula, two separate weighted totals are calculated for each district in the nation, based on either their number or percentage of children living in poverty. The higher of the two weighted totals is used to determine the final district allocation. The Title I total received by school districts is primarily based on each district's share of national poverty, but also includes other factors that are important to the E-Rate's founders, such as concentrations of poverty, regional education costs, and funding equity.

If the Commission decides that a formula approach is the way forward, we offer our assistance to help ensure that the program's original intent – a focus on the most disadvantaged schools and communities – remains the core basis of the funding structure. However, the Council continues to discourage the Commission from embarking on a formula or block grant approach.

Conclusion

The Council supports the goals outlined in the Administration's ConnectED initiative, and continues to offer our support to help the Commission convert the proposal into policy. But we underscore that it has never been more essential for the Commission to ensure that high levels of E-Rate support remains available for urban schools to operate classrooms, modernize teaching and learning, and maintain their current pace of academic improvement. We must use this opportunity to build on the existing success of the E-Rate program and ensure our most disadvantaged students can benefit from modern instruction.

Respectfully Submitted,

Michael D. Casserly, Executive Director Council of the Great City Schools

Address: Council of the Great City Schools Suite 702 1301 Pennsylvania Avenue, NW Washington, DC 20004

The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 67 large city school districts, its mission is to promote the cause of urban schools and to advocate for inner-city students through legislation, research and media relations. The organization also provides a network for school districts sharing common problems to exchange information, and to collectively address new challenges as they emerge in order to deliver the best possible education for urban youth.

Member districts: Albuquerque, Anchorage, Atlanta, Austin, Baltimore, Birmingham, Boston, Bridgeport, Broward County (Ft. Lauderdale), Buffalo, Charleston County (S.C.), Charlotte-Mecklenburg, Chicago, Cincinnati, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), East Baton Rouge, El Paso, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hawaii, Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Long Beach, Los Angeles, Miami-Dade County, Milwaukee, Minneapolis, Nashville, Newark, New Orleans, New York City, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pittsburgh, Portland, Providence, Richmond, Rochester, Sacramento, San Diego, San Francisco, Santa Ana, Seattle, Shelby County (Memphis), St. Louis, St. Paul, Toledo, Washington, D.C., and Wichita.

Before the Federal Communications Commission Washington, D.C. 20554

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) WC Docket No. 13-184
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Program for Schools and Libraries) CC Docket No. 02-6
)

COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

The Council of the Great City Schools is pleased to submit comments to the Notice of Proposed Rulemaking seeking to modernize the E-Rate Program for schools and libraries, released by the Federal Communications Commission on March 6, 2014. (WC Docket No. 13-184, CC Docket No. 02-6).

Introduction

The Council of the Great City Schools appreciates the opportunity to respond to the Commission's Public Notice on E-Rate Modernization. As the Commission has stated, financial support from the E-Rate has helped many schools be a part of the immense technological advancements our society has seen in the last 15 years, and provided educators and students with access to modern communications that they may not have accessed otherwise. The Council believes that both updating the E-Rate and increasing the funding support are unconditional modifications that must be made.

The Council of the Great City Schools includes 67 of the nation's largest urban school districts. These 67 districts represent less than half of one percent of the approximately 18,000 school districts in the U.S., yet enroll almost 7 million students, including approximately 25 percent of the nation's Hispanic students, 30 percent of the nation's African American students, and 25 percent of the nation's children living in poverty. In short, school districts in the Council collectively serve the nation's highest numbers and concentrations of disadvantaged children, employ the largest number of teachers, and operate in the greatest number of outdated and deteriorating buildings.

In previous comments, we have praised the E-Rate because of the opportunity it offers urban schools to provide the technology that can enhance teaching and learning. Results on the National Assessment of Education Progress (NAEP) during the past decade have shown that while urban districts still lag behind academically, they have made significant progress and

greater gains than any other educational entity in the United States. These are test results the entire nation should be encouraged about, and for which the FCC can take some credit.

Significant gaps still exist, however, between urban schools and the average American school, when it comes to both academic performance and funding equity. Historically shallow resources for inner city education have been exacerbated by the current economic constraints facing city, state, and federal budgets. The Council supports the goals outlined in the Administration's ConnectED initiative, and continues to offer our support to help the Commission convert the proposal into policy. But we must underscore that it has never been more essential for the Commission to ensure that high levels of E-Rate support remains available for urban schools to operate classrooms, modernize teaching and learning, and maintain their current pace of academic improvement.

In this modernization effort, the Commission is attempting to transition the focus of the program towards expanding broadband services, which are certainly necessary for all schools to achieve future success. We are concerned, however, that with limited program funding, shifting the program to service all schools will result in less support for the intended beneficiaries: those applicants serving the nation's most disadvantaged and high-poverty communities.

The Council appreciates statements from Chairman Wheeler stating that, if merited, an increase in the funding cap is possible, and we feel that sufficient evidence has been provided to the Commission – during this rulemaking process, through the annual demand for reimbursements, and in thousands of comments over the program's life – to support that decision. Reform is an important part of the E-Rate program, but the FCC should build upon the successes of the program and increase the amount of money available to fuel the overhaul, rather than simply reprioritizing existing services and funding levels. An increase in the annual funding cap is needed to help schools maintain their current operations, spur increased broadband capacity, and further the nation's progress towards the ambitious goals laid out by the president.

Focus on Disadvantaged Communities

As discussed above, we urge the Commission not to make any changes to the program that would have an adverse impact on the nation's poorest communities, and those schools in either rural or urban settings. In our response to the 2013 NPRM, we outlined several potential changes that could have a negative financial result. Modifying the discount matrix, requiring a single poverty percentage for an entire district, or denying the use of Community Eligibility poverty data could dilute the financial benefits of the E-Rate, and result in less targeting of support to our nation's neediest students.

When the Telecommunications Act was developed in the 104th Congress, the intent of legislators to focus E-Rate support on the students most in need was clear. During floor debate on June 8, 1995, Senator Jay Rockefeller, a Democrat from rural West Virginia and a key sponsor of universal service, asserted that equity would result from leveling the playing field for poor students, and was an important part of the bill. Senator Rockefeller stated:

"We have something in this law called 'public interest.' If there is ever a case of public interest, it is that people who are born in poor circumstances, in rich circumstances, in rural areas, in urban areas, or somewhere in between on either of those fronts have an equal chance in terms of the education system and the computer system and the health system of this country."

Senator Olympia Snowe, a Republican sponsor of the universal service provisions from Maine, also spoke that day about the benefits of universal service, and how the intent of this provision in the Telecommunications Act is to target the digital divide, specifically in, "rural areas and some urban areas, because the people do not have the capacity to get on line to join up with that information highway." In debating the benefits of the E-Rate, she further clarified this point by describing the opportunities universal service would provide for financially disadvantaged neighborhoods, in saying:

"Some have suggested that these discounts would be wasted on some communities with poor schools, low literacy rates, high levels of unemployment, or other social problems. I disagree. This language will open doors, not close them. Those communities stand to gain enormously from the telecommunication network. It will open up a whole new world to these communities."

The congressional and bipartisan intent of the E-Rate is made clear by the legislative history established in these floor speeches. The E-Rate provisions were established to balance out the inequities that exist in society by focusing on the poorest communities. There was no discussion of targeting funding to all schools, or funding applicants with low or average levels of poverty. In fact, Senator Jeff Bingaman, a Democrat from New Mexico, stated that those who could afford to pay for technology themselves should do so, while the program should focus on those who could not.

"The free market system will provide technological opportunity and new technology and benefits to those who can pay the bill. We want that to happen. But we also want some access to that technology for those who may not be able to pay as much and that is what this provision is intended to do."

Interestingly, another rural Republican, Senator James Jeffords from Vermont, specifically spoke about the need in urban schools, citing visits to Baltimore, New York, Detroit, Washington, DC, Los Angeles, and San Diego in his floor remarks. As the education subcommittee chairman for the chamber's Committee on Labor and Human Resources, he remarked on the need in these districts:

"As I talk with them and travel with them, there is no question but that one of the most critical and important barriers they have to being able to participate in a meaningful way by the utilization of computer technology to provide the education through the software that would be made available and the opportunities that come through that is the inability to have affordable telephone communications."

We understand that urban schools have benefitted greatly from the E-Rate since passage of the Act, and do not argue that there are areas of the nation with high poverty that struggle to provide adequate technology levels in their classrooms. But we have concerns about proposals to create "widespread access" to E-Rate funding when the job remains incomplete in the program's intended areas. Urban schools still have significant digital divides and technology needs, and further E-Rate funding is essential both to continue current practices, and to begin the delivery of next-generation education services, such as content-rich media, participation in online state assessments, blended learning, computer adaptive testing, individualized student learning objectives, and 1:1 computing practices.

The focus on the most disadvantaged schools and students is not unique for national education programs, most of which have also remained underfunded. The largest federal program for K-12 education, Title I of the Elementary and Secondary Education Act (ESEA), is appropriated at approximately one-third of the generally agreed upon full-funding level. As a result, the program does not serve just any school that enrolls a poor student, but wisely avoids the dilution of funds by requiring schools to have a poverty level above the district average or at least 35% in order to be eligible for funding. Many districts, in seeking to get the most effective use of this federal money, set the poverty threshold far higher. Urban school districts in the Council average a minimum threshold above 50%.

We also continue to advocate ceaselessly for an increased annual cap because it is obvious the only way the Commission will meet the needs of all students in this country – both poor and non-poor – is through additional funding. Yet we remain concerned that providing the true and necessary amount of funding for all schools in the nation is an unlikely outcome, and that an inadequate funding level coupled with service for all schools will result in reduced support for the neediest communities. The Commission itself recognizes this possibility, by including questions in the Public Notice about how to proceed, "in the event that demand exceeds availability." In such an event, the program must remain focused on the program's original beneficiaries.

Broadband Deployment Within and To Schools

The Council supports the eligibility of equipment that is essential for getting high-capacity broadband from the building's front door to learning devices in schools, including internal wiring, switches and routers, wireless access points, and wireless controllers. In addition, the software supporting these components, including load balancing, switch management and fault detection software should be eligible, as well as WAN optimization and packet shaping services. These components are essential for maintaining and operating networks in large districts.

We also agree with the Commission that the E-rate should support caching through content servers to reduce broadband demand. However, there should be a clear definition of cache, or at least some flexibility so schools can determine what tools are required to get more broadband to the classroom.

The Council urges the Commission to consider the inclusion of internet filtering and proxy equipment, as well as firewall and security equipment such as IPS and IDS protection, as eligible services. These types of services are vital to avoid student exposure to inappropriate internet content, and keep district networks safe from attacks. Security infrastructure needs to be included if districts are expected to expand broadband and wireless availability in schools.

Finally, we support the Commission's considering a one-time investment fund for major projects, although we do not want such a fund to come at the expense of the annual cap. Initial costs are a hurdle that many districts can't currently overcome, and one example was provided in joint comments filed by the City of Chicago, the Chicago Public Schools, and the Chicago Public Libraries. In their response to the NPRM, they stated, "Fiber is the most cost effective, scalable and reliable broadband solution today, but it is not always the most cost-effective method for increasing capacity at sites, as fiber last-mile costs can be high in urban areas as well as rural areas. Dark fiber is being considered as a future option for the CPS and could reduce costs in the long run, but high startup costs are a barrier to adoption. To take full advantage of this technology, we will also need to upgrade core internal infrastructure." This situation is common in districts throughout the country, and is another example of the significant need for sufficient funding from the E-Rate program.

Access to Funding

The Council appreciates the flexibility the Commission is exploring during its review of the E-Rate program. In terms of access to funding, however, we repeat our claim that a significant increase in the annual cap is the most appropriate way to provide funding for all schools in the nation. If the cap is not increased, the Public Notice's suggested options to widen access to funding do little to promote the equity intended in the Telecommunications Act. Putting the poorest schools and districts on hold during a five-year cycle, or asking applicants to wait through rotating eligibility, is not a sound policy for targeting poverty. Nor has it proven to be an effective method for applicants seeking reliable funding sources for implementing a technology plan.

As we stated in our reply to last year's NPRM, the Council remains wary of changes to the funding process that would create budgets, ceilings, or caps for applicants, or would shift the funding process to a formula block grant for schools and libraries. All of our school districts favor greater flexibility and predictability in the program, and changes that move in that direction are welcome. But we remain opposed to a new system that does not target poor students, reduces funding for the neediest schools and libraries, or requires applicants to pay a greater share of project costs than they can afford.

Being located in an urban area does not guarantee increased competition and lower costs. Urban applicants often receive few responses to their bids and 470 postings, and sometimes receive no response. Not all service providers want to work or invest in inner-city neighborhoods, and many do not have the capacity to provide services or maintenance at dozens, if not hundreds, of locations. As a result, the cheapest services are not always an available option for city schools.

A per-student cap does not recognize this, as well as other factors that drive up costs in urban areas, such as age of the building, square footage, regional pricing and a number of other market factors that affect the bottom line. We also share the concerns that others have raised about the correlation between a per capita model and investments in technology infrastructure or for paying for recurring services. The cost to bring connectivity to school buildings, regardless of the number of students in each building, requires a core infrastructure cost.

We also recognize that despite the significant concerns and complications raised by commenters regarding a formula distribution, the Commission does have the ultimate decision in whether or not to move the program in that direction. We strongly suggest that any formula that is considered by the Commission be based not on the number of students in a school, but rather *on the number of poor students*. This will help ensure that the program's original intent – a focus on the most disadvantaged schools and communities – remains the core basis of the funding structure.

Phasing Out Eligible Services

Voice Services

Urban schools continue to fear the Commission's elimination of E-Rate support for voice services. We appreciate the inclusion of remarks by the Council on this topic in the Public Notice, as well as the warnings from a number of school districts of the harm that would be caused by such a decision. We would specifically like to highlight the comments from the School District of Philadelphia (SDP) on this topic. In the district's response, they stated that SDP, "opposes any proposal to phase out or eliminate the eligibility of voice services. The telephony infrastructure in all SDP schools was designed around current E-rate program rules and eligibility framework and the elimination of voice telephone service as an eligible service would be of great hardship and would pose a direct risk to the safety and security of students and teachers."

The Philadelphia schools continued to say, "Traditional voice service, whether delivered as an analog or digital service, is a proven, reliable and cost-effective solution for bringing telephony services to schools and classrooms. Prior to the introduction of the E-rate program, less than 30 percent of SDP classrooms had functioning voice service. SDP took advantage of E - rate funding to construct and greatly expand voice services to the classroom, inclusive of the purchase and installation of PBX systems and related equipment."

We share the Philadelphia comments not only to demonstrate the investment in and importance of voice services, but also because of the specific details they provided regarding traditional voice and VoIP service. The Public Notice also asked whether instead of the outright elimination of voice services, perhaps some support should be preserved for VoIP or VoIP transition. We would argue that this VoIP proposal demonstrates the Commission's acknowledgement of the importance of voice services to the educational purpose of schools – for vital communications between teachers, administrators, parents, and the community. We would also finally point out that Philadelphia, and many other districts, have shared with the Commission that moving to VoIP would not result in savings for the district. Specifically, "SDP has found that even the

largest telecommunications carriers in Philadelphia still cannot deliver VOIP-based telephony to buildings and/or directly to classrooms in a more cost-favorable manner than traditional analog or PRI-based services."

The Council understands the Commission's focus on services that further the broadband goal, but remain unconvinced about eliminating support for voice services. In the current economic environment, E-Rate support for cost-effective systems that are already in place should not be eliminated for any reason. Once E-Rate reimbursements are disallowed, state or local funding is not available to help school districts with their share of the service. The Commission's decision will simply result in increased local costs.

If the Commission does decide to eliminate voice services, multiple years of phased-down support is the only approach to minimize the financial harm to school districts, to allow planning time to determine the best options for new infrastructure and services, and to terminate existing contracts. The Commission should also be sure to preserve some support for traditional phone service, since landlines are required for essential safety features, such as elevator car communications, alarm systems, and connections of emergency services in the event of disaster. With a heavy reliance on broadband data networks, some funding support for these traditional components becomes even more of a necessity, as a basic level of communications service is needed in case of network failure.

Maintenance

Although not a focus of the Public Notice, the Council would like to repeat our opposition to the elimination of maintenance reimbursements. Basic Maintenance is vital to ensure that the E-Rate's investment in infrastructure was wise and sustainable. Earlier Orders from the Commission recognized this need, and cited basic maintenance as "necessary for the operation of the internal connections network." The nation's urban applicants have devoted scarce local funding to build technology networks with the understanding that E-Rate maintenance reimbursements would be available to help them operate and serve classrooms.

Revoking the eligibility of maintenance costs will sacrifice both the local and E-Rate money that has been spent, and retroactively change the factors which school districts considered in making funding and budgeting decisions. It could also have a chilling effect on future investment in infrastructure and broadband purchases, as school boards contemplate a costly local share for upkeep. Finally, in the broadband environment the Commission is working towards, the faster networks tend to be more complex, cost more to maintain and are harder to troubleshoot. Just like it has been to date, maintenance funding will be a critical component to ensure the success of the E-Rate moving forward.

Conclusion

As one of the E-Rate program's most dedicated stakeholders and supporters, and one of the primary beneficiaries intended by Congress, urban public schools appreciate the opportunity to provide input on the Commission's E-Rate modernization efforts. The E-Rate allows city school districts to benefit from modern telecommunications, and the program has helped many poor students and disadvantaged schools receive access to technology, media, and information-rich

instructional content that is a necessary part of contemporary education. The president's call to deploy high-capacity bandwidth to all students, teachers, and schools is a sound investment for our nation, and one we wholly support.

Urban schools are working hard to make the Common Core State Standards a resounding success, and broadband funding is an important part of the effort to improve instruction and provide a modern learning environment for the nation's largest concentrations of poor and disadvantaged poor children. We ask the Commission to remain aware of the fact that any E-Rate eligibility decisions they make can both positively impact future investments and also harm existing ones. As it reviews comments from stakeholders and makes changes to the program, we urge the Commission to update the E-Rate in a way that both achieves the ConnectED goals but continues to help our nation's neediest schools reach their goals of raising student achievement, meeting high standards, and providing all students with a safe, secure, and modern learning environment.

Respectfully Submitted,

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The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 67 large city school districts, its mission is to promote the cause of urban schools and to advocate for inner-city students through legislation, research and media relations. The organization also provides a network for school districts sharing common problems to exchange information, and to collectively address new challenges as they emerge in order to deliver the best possible education for urban youth.

Member districts: Albuquerque, Anchorage, Atlanta, Austin, Baltimore, Birmingham, Boston, Bridgeport, Broward County (Ft. Lauderdale), Buffalo, Charleston County (S.C.), Charlotte-Mecklenburg, Chicago, Cincinnati, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), East Baton Rouge, El Paso, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hawaii, Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Long Beach, Los Angeles, Miami-Dade County, Milwaukee, Minneapolis, Nashville, Newark, New Orleans, New York City, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pittsburgh, Portland, Providence, Richmond, Rochester, Sacramento, San Diego, San Francisco, Santa Ana, Seattle, Shelby County (Memphis), St. Louis, St. Paul, Toledo, Washington, D.C., and Wichita.

Summary of the E-Rate Report and Order and Further Notice of Proposed Rulemaking (FNPRM)

The Report and Order outlines three major goals for the FCC in making changes to the E-Rate program. This summary is organized around these three goals, starting with the measures that will be used to gauge progress towards the goals, and then by outlining the actual program changes that were approved by the Commission. The summary concludes with the new proposals, questions and comments sought by the Commission in the Further Notice of Proposed Rulemaking (FMPRM).

<u>Notes:</u> In the Report and Order and in this summary, the term "we" or "Commission" refers to the FCC as a whole, "Bureau" refers to the Wireline Competition Bureau within the FCC, and "OMD" refers to the Office of the Managing Director within the FCC.

E-Rate Report and Order

The three goals we adopt for the E-rate program are:

- (1) ensuring affordable access to high-speed broadband sufficient to support digital learning in schools and robust connectivity for all libraries;
- (2) maximizing the cost-effectiveness of spending for E-rate supported purchases; and
- (3) making the E-rate application process and other E-rate processes fast, simple and efficient.

MEASURES

1. Ensuring Affordable Access to High-Speed Broadband Sufficient to Support Digital Learning in Schools and Robust Connectivity for All Libraries

Internet Access

• Connectivity Targets: We adopt the State Education Technology Directors Association's (SETDA) target recommendation of Internet access for schools of at least 100 Mbps per 1,000 students and staff (users) in the short term and 1 Gbps Internet access per 1,000 users in the longer term. We recognize that the SETDA target for Internet access connectivity may not be appropriate for every school or school district, especially very large or very small districts or individual schools, and will take that into account when measuring success towards the targets we set today.

WAN

• Connectivity Targets: We adopt as a target for WAN connectivity the total number of schools that have a connection capable of providing a dedicated data service scalable to the SETDA long-term WAN target of 10 Gbps per 1,000 students. (Due to differing needs in schools with differing enrollments and needs...) We therefore adopt a target that focuses on the *scalable capacity* of school district WAN connections to 10 Gbps per 1,000 students. In most cases, a 1 Gbps fiber connection can be readily scaled to 10 Gbps with upgraded networking equipment.

Internal Connections

• Connectivity Targets and Affordability: Pending the development of a suitable available bandwidth measure for internal connectivity, we find that a survey of school districts and libraries is the best method to gauge the sufficiency of internal connections at this time.

We direct the Bureau to revise the information collections from E-rate applicants and vendors to collect data regarding the specific measures adopted above.

2. Maximizing the Cost-Effectiveness of Spending for E-rate Supported Purchases

For connectivity within schools and libraries

We will measure and report pricing as a function of number of users or unique devices. We will track pricing of eligible expenses associated with LANs and WLANs (e.g., Wi-Fi), including pricing of eligible network components (e.g., switches, routers, wireless access points, cabling), managed services, and other eligible services associated with LANs and WLANs. In addition to tracking the pricing and capacity, we will seek to track utilization and performance of these internal connections to more fully measure the value delivered with E-rate support. We will also track replacement and upgrade cycles and LAN/WLAN architectures to accurately measure cost-effectiveness.

For connectivity to school and library locations

We will measure and report on prices paid as a function of bandwidth (e.g., dollars per Mbps) and also as a function of number of users (or unique devices). In addition, we will track pricing as a function of various potential cost drivers, which may include physical layer type (e.g., fiber, copper, coax, fixed wireless), service type (e.g., DSL, cable modem, metro Ethernet, Internet access), geography (e.g., rural, urban), carrier, carrier type, and purchasing mechanism (e.g., individual school, district, regional consortium).

3. Making the E-rate Application Process and Other E-rate Processes Fast, Simple and Efficient

<u>Timely processing of funding commitments to eligible schools and libraries by USAC</u> Simplifying and improving E-Rate procedures will help applicants receive their funding in a timely fashion, and will allow them to plan better and maximize the impact of their support.

- We direct USAC to aim to issue funding commitments or denials for all "workable" funding requests by September 1st of each funding year.
 - "Workable" means that a funding request is filed timely and is complete, with all necessary
 information, to enable a reviewer to make the appropriate funding decision, and the applicant,
 provider, and any consultants are not subject to investigation, audit, or other similar reason
 for delay in a funding decision.
 - Funding requests from applicants that decline to respond to USAC inquiries over the summer may be considered "unworkable" for purposes of this performance goal, though USAC will process these applications as quickly as possible when school staff return for the year.
- USAC shall continue to report at least monthly on its progress toward this goal, based on the dollars
 of requests processed and the total count of schools and libraries represented in those requests, as
 well as any other specific metrics OMD identifies, and on any obstacles to achieving the application
 processing target.

PROGRAM CHANGES

1. Ensuring Affordable Access to High-Speed Broadband Sufficient to Support Digital Learning in Schools and Robust Connectivity for All Libraries

We change the E-rate program's existing priority funding nomenclature. In place of Priority 1 and 2, we designate:

- The services needed to support broadband connectivity to schools and libraries as "category one" services, and
- Those services needed for broadband connectivity within schools and libraries as "category two" services.

Funding for Broadband Within Schools and Libraries

In providing support for Internal Connections:

- We set a funding target of \$1 billion annually for category two services on an ongoing basis
- We direct USAC to shift funds targeted for category two services to meet all eligible requests for category one services, in any funding year in which demand for category one services exceeds available funds
- If demand for internal connections exceeds the available funding for category two services, we will prioritize access to internal connections funding based on concentrations of poverty. Those schools and libraries entitled to a higher discount, based on the district-wide discount methodology described in section VI.B.1., will receive internal connections funding ahead of those entitled to a lower discount rate.
- If requests for category one services are less than the available funding and demand for category two services is higher than the \$1 billion target for category two services at the close of the funding year window, the FCC may redirect the excess funding to category two services in the same funding year

<u>Increasing the Minimum Applicant Contribution Rate for Category Two Services:</u>

We will increase the minimum contribution applicants must make towards E-rate supported category two purchases from 10 to 15 percent, for Category Two only.

• The maximum discount for applicants will be 85% instead of 90%

Setting Applicant Budgets

- We adopt budgets for applicants who apply for category two discounts during the next two funding years, as we continue to evaluate long term program needs.
- Schools in districts that seek category two funding during funding years 2015 or 2016 will be eligible to request E-rate discounts on purchases of up to \$150 (pre-discount) per student for category two services over a five-year period.
- If an applicant receives funding for category two services in funding year 2015 or 2016, the five-year budget will apply in the subsequent five funding years, in lieu of the existing "two-in-five" rule.
- For example, over a five-year period, schools or districts at the 80 percent level will be able to request up to \$120 in E-rate support per student (an 80 percent discount on \$150 in services) and be required to pay 20 percent of the cost of eligible category two services that they purchase.
- Applicants will be required to seek support for category two services on a school-by-school basis, although school districts will use a single district-wide discount rate for all of their schools.
- For example, a large district may choose to upgrade one fifth of its schools in each of the five funding years, while a small district may request support to upgrade all of its schools in one funding year.

- Applicants that receive support in funding year 2015 will have \$150 per student available divided over funding years 2016, 2017, 2018, and 2019.
- Applicants that receive support in funding year 2016, but not in funding year 2015, will have a budget of \$150 per student divided over funding years 2017, 2018, 2019, and 2020.
- This approach allows applicants to plan how to deploy their networks over five years, whether by requesting support for all or just a portion of entities each year, or by purchasing a managed Wi-Fi service through which a third party provider installs and manages the necessary LAN and WLAN.
- In order to determine the budget available each funding year, districts should calculate the number of students per school at the same time that they calculate their district-wide discount rate annually.
- We recognize that there will be some instances, such as the construction of a new school, that will
 make calculating the number of students more difficult for districts. We will permit schools and
 school districts to provide a reasonable estimate of the number of students who will be attending a
 school under construction during a particular funding year and seek support for the estimated
 number of students.
- We note, however, that there may be funding years in which an entity loses students and therefore spent more than its available budget in the prior four funding years. In these instances, we will not require repayment of any E-rate support, but there will be no available funding for that funding year.

Focusing Support on Broadband

In order to help deploy LANs/WLANs necessary to permit digital learning in schools and libraries throughout the nation, we focus the category two ESL on broadband

- With one narrow exception (designating caching functionality as eligible for internal connections support), we limit internal connections support to those broadband distribution services and equipment needed to deliver broadband to students and library patrons:
 - O Routers, switches, wireless access points, internal cabling, racks, wireless controller systems, firewall services, uninterruptable power supply, and the software supporting each of these components used to distribute high-speed broadband throughout school buildings.
- We do not limit these eligible services by form, and therefore agree that equipment that combines
 functionality, like routing and switching, is also eligible. Similarly, we recognize that some
 functionalities can be virtualized in the cloud, such as cloud wireless controllers, and therefore
 will permit such services to be eligible for purchase by schools
- To focus support on only those internal connections necessary to enable high-speed broadband connectivity, beginning in funding year 2015, we eliminate E-rate support for the priority two components that had been in the following ESL entries:
 - Circuit Cards/Components; Interfaces, Gateways, Antennas; Servers; Software; Storage Devices; Telephone Components, Video Components, as well as voice over IP or video over IP components, and the components, such as virtual private networks, that are listed under Data Protection other than firewalls and uninterruptible power supply/battery backup
- For funding years 2015 and 2016, we will continue to provide support for basic maintenance services subject to each school or library's overall budget on E-rate eligible category two services.
- In light of the applicant budgets for funding years 2015 and 2016, we are persuaded by commenters who argue that managed Wi-Fi, which we call managed internal broadband services in the rules to cover the operation, management, or monitoring of a LAN or WLAN, should be eligible for internal connections support.
- Under the five-year applicant budget approach we adopt above, a district, school, or library will be able to seek annual support for a managed Wi-Fi service, up to an average pre-discount rate cost of \$30 per student per year.

- We also clarify that E-rate support for managed Wi-Fi is limited to those expenses or portions of
 expenses that directly support and are necessary for the broadband connectivity within schools
 and libraries
 - Eligible managed Wi-Fi expenses include the management and operation of the LAN/WLAN, including installation, activation, and initial configuration of eligible components, and on-site training on the use of eligible equipment.
 - o Eligible managed Wi-Fi expenses do not include a managed voice service, for example.
- Due in part to the applicant budgets for funding years 2015 and 2016 limiting waste or abuse, we agree with commenters who argue that caching functionality should be eligible for internal connections support.
- We direct the Bureau to release for comment a draft ESL for funding year 2015 consistent with this Report and Order, and encourage applicants to carefully review the eligible components included in the modernized category two section in that draft ESL.
- Category Two Installation Can Begin on April 1. We also amend our rules for category two non-recurring services to permit applicants to seek support for category two eligible services purchased on or after April 1, three months prior to the start of funding year on July 1.

<u>Phasing Down and Ending Support for Legacy and Other Non-Broadband Services</u> Voice Services. We will reduce voice support each funding year by subtracting the discount rate applicants receive for voice services by 20 percentage points every funding year.

- In funding year 2015, the discounts applicants receive for voice services will be reduced by 20 percentage points from their discount rates for other eligible services, and in funding year 2016, the discounts applicants receive for voice services will be 40 percentage points lower than their discount rates for other eligible services.
- In each subsequent funding year, the discounts applicants receive for voice services will be reduced by an additional 20 percentage points.
- The reduced discount rates for voice services will apply to all applicants and all costs incurred for the provision of telephone services and circuit capacity dedicated to providing voice services including:
 - local phone service, long distance service, plain old telephone service (POTS), radio loop, 800 service, satellite telephone, shared telephone service, Centrex, wireless telephone service such as cellular, and interconnected VoIP

Eliminating Support for Telephone Features, Outdated Services, and Non-Broadband Services That Do Not Facilitate High- Speed Broadband

We eliminate support for other legacy and non-broadband services effective for funding year 2015, and specifically eliminate:

- Components of telephone service, including directory assistance charges, text messaging, custom calling services, direct inward dialing, 900/976 call blocking, and inside wire maintenance plans.
- Outdated services such as paging and directory assistance.
- Services that may use broadband but do not provide it, including e-mail, voice mail, and web hosting.

We decline to provide exceptions or allow "grandfathering" for existing multi-year contracts for phasedout services

Applicants may continue to seek support for individual data plans and air cards, but only when they can demonstrate, consistent with our current rules, that the purchase of such services is the most cost-effective way to connect students on school premises or library locations to the Internet.

2. Maximizing the Cost-Effectiveness of Spending for E-rate Supported Purchases

Increasing Pricing Transparency

To increase pricing transparency in the E-rate program:

- We will make information regarding the specific services and equipment purchased by schools and libraries, as well as their line item costs, publicly available on USAC's website for funding year 2015 and beyond.
- This information is currently collected on FCC Form 471, Block 5, Item 21 ("Item 21s").

We decline at this time to require:

- Public disclosure of other pricing information, including available pricing from service providers or bid responses
- Disclosure of pricing information for past funding years, and
- We terminate the program the Commission created in the *Second Report and Order* testing an online list of internal connections equipment eligible for discounts.

Encouraging Consortia and Bulk Purchasing

In order to encourage consortia applications, we direct OMD and the Bureau, working with USAC, to prioritize application review for state and regional consortia applicants.

In order to encourage bulk buying opportunities, we delegate authority to the Bureau to designate preferred master contracts for category two equipment:

- We allow applicants to take internal connections equipment from a preferred master contract without filing an FCC Form 470
- Applicants will be required to include equipment available on a preferred master contract in their bid evaluations if it is the same equipment the applicant sought on its FCC Form 470

To increase cost-effective purchasing by applicants, we amend our rules to permit a consortium lead to identify on its consortium's FCC Form 470 the schools, school districts and libraries for which it has authority to seek competitive bids for E-rate eligible services even if it does not have authority to order services for those entities.

Lowest Corresponding Price (LCP)

We remind service providers that they not only must charge eligible schools, libraries, and consortia the LCP when providing E-rate services, but also must offer eligible entities the LCP when submitting competitive bids to provide E-rate supported services.

• The LCP rule benefits E-rate applicants and the Fund by ensuring that the price for E-rate supported services is no more than the market price for those services, absent a showing by a provider that it faces demonstrably higher costs to serve a particular school or library.

3. Making the E-rate Application Process and Other E-rate Processes Fast, Simple and Efficient

Simplifying the Application Process

Simplifying the E-rate application process is an important part of streamlining the administration of the E-rate program.

• **Multi-year contracts for eligible services:** This simplified application process will be available to any applicant, beginning in funding year 2015, when:

- (1) the applicant has a multi-year contract for E-rate supported services that is no longer than five years, and
- (2) any changes in the requested services or to the terms and conditions under which those services are provided are within the scope of the establishing FCC Form 470 and the applicable contract.
- Applicants that elect to use the multi-year contract funding review process will only be required to submit a complete FCC Form 471 for the first funding year in which they are seeking E-rate support under the multi-year contract.
- All applicants, even those currently in the middle of a multi-year contract, will be required to file a complete FCC Form 471 once.
- In subsequent funding years covered by a multi-year contract, applicants will be permitted to use a streamlined application process that will be shorter, require less information from the applicants, and be approved through an expedited review process.
- We agree that five years is an appropriate maximum length of time for contracts seeking to use a
 multi-year contract application process and find that the three-year limit the Commission
 proposed in the E-rate Modernization NPRM is too restrictive, but do not adopt a maximum
 contract length in this Report and Order
- Under this revised application process, applicants must file a complete FCC Form 471 in the first year of a multi-year contract that is eligible for this streamlined review process, but in subsequent contract years applicants will only need to provide basic information identifying the applicant, confirm that the funding request is a continuation of a FRN from a previous year based on a multi-year contract, and identify and explain any changes to their application, such as changes in the discount rate, the membership of a consortium, or the services ordered.
- Eliminating the Technology Plan Requirements: Beginning with funding year 2015, we eliminate from our rules the technology plan requirements for applicants seeking E-rate support for category two services
- Exempting Low-Dollar Purchases of Commercially Available Business-Class Internet Access from Competitive Bidding Rules: We create an exemption in our competitive bidding rules for applicants seeking E-rate support to purchase commercially available, business-class Internet access services that cost \$3,600 (pre-discount) or less for a single year.
- An Internet access service will be eligible for this exemption only if it offers bandwidth speeds of at least 100 Mbps downstream and 10 Mbps upstream for a pre-discount price of \$3,600 or less annually, including any one-time installation and equipment charges, and the service and price are commercially available.
- Such applicants will use the FCC Form 471 to certify to their purchase of an eligible commercially available business-class Internet access service.
- Easing the Signed Contract Requirement: To further increase the efficiency of the administrative process and simplify the application process for applicants, we revise section 54.504(a) of our rules to require that applicants have a signed contract or other legally binding agreement in place prior to submitting their FCC Forms 471 to USAC.
- Applicants and service providers should understand that, although no longer required, a signed contract will constitute the best evidence that a legally binding agreement exists.
- Absent the existence of a signed contract, in determining whether a legally binding agreement is in place, we direct USAC to consider the existence of a written offer from the service provider containing all the material terms and conditions and a written acceptance of that offer as evidence of the existence of a legally binding agreement.
- **Requiring Electronic Filing of Documents:** We and require E-rate applicants and service providers to file all documents with USAC electronically and USAC to make all notifications

- electronically, and therefore direct USAC, in consultation with the Bureau and OMD, to phase in such a requirement over the next three funding years.
- We will therefore allow applicants who can demonstrate that they have insufficient resources to make electronic filings to file paper copies of applications and other documents.
- Enabling Direct Connections Between Schools and Libraries: In the interest of promoting access to high-speed broadband connections in the simplest and most efficient manner possible, we allow rural schools and libraries eligible for E-rate support to establish direct connections with each other for the purpose of accessing high-speed broadband services.

Simplifying Discount Rate Calculations

We adopt four changes to the procedures for applicants to use in calculating their E-rate discounts.

- Adopting District-Wide Discount Rates: We adopt the proposal in the E-rate Modernization NPRM to amend our rules to require each school district to calculate and use a single district-wide discount rate, rather than calculating and using building-by-building discount rates.
- This requirement will be effective beginning with funding year 2015.
- We revise our rules to require school districts to calculate their E-rate discounts by:
 - o dividing the total number of students in the district eligible for the NSLP by the total number of students in the district and comparing that single figure against the discount matrix to determine the school district's discount rate for E-rate supported services.
- All public schools and libraries within that public school district will receive the same discount rate
- Private and charter schools generally operate independently of the main public school district and
 are individually responsible for their finances and administration, and these educational entities
 should calculate their discounts separately if not affiliated financially or operationally with a
 school district.
- Updating the Definition of "Rural": We adopt the U.S. Census Bureau (Census) definitions of rural and urban for the purpose of determining whether an E-rate applicant qualifies for an additional rural discount.
- Addressing the NSLP Community Eligibility Provision: Beginning with funding year 2015, we will allow schools and school districts that are participating in the NSLP CEP to use the same approach for determining their E-rate discount rate as they use for determining their NSLP reimbursement rate.
- Schools utilizing the CEP shall calculate their student eligibility for free or reduced priced lunches by multiplying the percentage of directly certified students by the CEP national multiplier.
- This number shall then be applied to the discount matrix to determine a school district's discount for eligible E-rate services.
- Schools participating in the CEP will not be considered to have a greater than 100 percent student eligibility for purposes of determining the district-wide discount rate for E-rate services, priority access to category two services, or for any other E-rate purposes.
- The USDA has the statutory authority to change the multiplier to a number between 1.3 and 1.6, and we will require CEP applicants to use the same multiplier under the E-rate program for determining their poverty level as required by the USDA for their reimbursement under the CEP.
- CEP applicants will not be required to calculate their discount rate every year, but shall use the calculation that they use during the course of a four-year CEP cycle.
- However, if an applicant adjusts that calculation for purposes of the CEP, it must also adjust it for purposes of E-rate support.

- Modifying the Requirements for Using School-Wide Income Surveys: We require schools and school districts seeking to calculate their E-rate discounts by using a school-wide income survey to base their E-rate discount rate <u>only on the surveys they actually collect</u> beginning with funding year 2015.
- Schools electing to use a school wide income survey to determine the number of students eligible for NSLP must calculate their E-Rate discount based only the surveys returned by their students that demonstrate that those students would qualify for participation in the free and reduced school lunch program to determine the school's E-Rate discount level.

Simplifying the Invoicing and Disbursement Processes

Consistent with our goal of reducing the administrative burdens on applicants and service providers, we take several measures related to the invoicing process to simplify and expedite funding disbursement.

- **Allowing Direct Invoicing:** We revise our rules to allow an applicant that pays the full cost of the E-rate supported services to a service provider to receive direct reimbursement from USAC, beginning with funding year 2016.
- Under this revised BEAR process, an applicant filing an FCC Form 471 and selecting reimbursement through the BEAR process will be required to have on file with USAC current and accurate information concerning where payments should be sent.
- Schools and libraries that choose to utilize the BEAR process must provide USAC with bank account information from a bank that can accept electronic transfers of money.
- Payments will not be made to consultants, but only directly to schools or libraries.
- Adopting Invoicing Deadlines: We codify USAC's existing invoice filing deadline to allow applicants to request and automatically receive a single one-time 120-day extension of the invoicing deadline.
- We will also allow USAC to de-obligate committed funds immediately after the invoicing deadline has passed, providing increased certainty about how much funding is available to be carried forward in future funding years.
- The invoice deadline extension rule will be effective beginning in funding year 2014.
- We understand there may be circumstances beyond some applicants' or service providers' control that could prevent them from meeting the 120-day invoice filing deadline, and therefore adopt a rule allowing applicants to seek and receive from USAC a single one-time invoicing extension for any given funding request, provided the extension request is made no later than what would otherwise be the deadline for submitting invoices: the latter of 120 days after the last day to receive service, or the date of the FCC Form 486 notification letter.
- By adopting such a rule, we eliminate the need for applicants and service providers to identify a reason for the requested extension and the need for USAC to determine whether such timely requests meet certain criteria.
- USAC shall grant no other invoicing deadline extensions.

Creating a Tribal Consultation, Training, and Outreach Program

We take several actions today to raise the profile of the E-rate program and ensure that Tribal schools and libraries are able to participate effectively in the program.

Requiring Filing of Appeals with USAC

We revise our rules to require parties aggrieved by an action taken by a division of USAC, including the Schools and Libraries Division, must first seek review of that decision by USAC before filing an appeal with the Commission.

- The standards for evaluating the merits of these appeals will be unchanged and affected parties
 will still have the right to seek Commission review of such decisions, as provided in the
 Commission's rules.
- This rule change will become effective 30 days after the publication of this Report and Order in the Federal Register.
- USAC cannot waive our rules; therefore parties seeking only a waiver of our rules are not governed by this requirement, but instead must seek relief directly from the Commission or the Bureau.

<u>Directing USAC to Adopt Additional Measures to Improve the Administration of the E-rate Program</u> We adopt a number of additional measures to ease the burden upon applicants, expedite commitments, and ensure that all applicants receive complete and timely information to help inform their decisions regarding E-rate purchases.

- Speeding Review of Applications, Commitment Decisions and Funding Disbursements: We adopt a specific application review and funding commitment target for all funding requests as a performance measure in evaluating our progress toward meeting our goal of streamlining the administrative process.
- Modernizing USAC's E-rate Information Technology Systems: We direct USAC and OMD to continue to work on modernizing USAC's E-rate IT systems.
- We direct OMD and the Bureau to continue USAC's IT modernization work, with a focus on easing the administrative burdens on E-rate applicants and service providers, while protecting against waste, fraud and abuse, and on collecting high-quality data that will assist us in measuring our progress towards the goals we adopt today.
- Requiring Open and Accessible E-rate Data: We direct USAC to timely publish through electronic means all non-confidential E-rate data in open, standardized, electronic formats, consistent with the principles of the Office of Management and Budget's (OMB's) Open Data Policy.
- USAC must provide the public with the ability to easily view and download non-confidential Erate data, for both individual datasets and aggregate data.
- We direct USAC to design open and accessible data solutions in a modular format to allow extensibility and agile development, such as providing for the use of application programming interfaces (APIs) where appropriate and releasing the code, as open source code, where feasible.
- Adopting Plain Language Review: We direct USAC to work with OMD to implement a full review and revision, as appropriate, of USAC's most commonly used correspondence using plain language, before the beginning of funding year 2016, in order to reduce applicant confusion and ensure parties have the information necessary to comply with or appeal USAC's decisions.

Protecting Against Waste Fraud and Abuse

We seek to modernize the E-rate program and ease the burdens upon applicants and service providers while ensuring the program's integrity by protecting against waste, fraud and abuse.

- Extending the E-rate Document Retention Requirements: We revise our rules to extend the document retention period from five to 10 years after the latter of the last day of the applicable funding year, or the service delivery deadline for the funding request.
- The current five-year document retention requirement is not adequate for purposes of litigation under the False Claims Act (FCA), which can involve conduct that occurred substantially more than five years prior to the filing of a complaint.

- Allowing Access for Inspections: We revise section 54.516 to clarify that E-rate applicants and service providers must permit auditors, investigators, attorneys or any other person appointed by a state education department, USAC, the Commission or any local, state or federal agency with jurisdiction over the entity to enter their premises to conduct E-rate compliance inspections.
- The list of entities entitled to appoint representatives to enter the premises of an applicant or service provider parallels the list of entities entitled to seek production of records from applicants and service providers

E-Rate Further Notice of Proposed Rulemaking (FNPRM)

Interested parties may file comments on this FNPRM by September 15, 2014 and may file reply comments by September 30, 2014.

Meeting Future Funding Needs

We seek additional comment on the future funding levels needed for the E-rate program to meet those goals, specifically inviting:

- Data regarding the gap between schools' and libraries' current connectivity and the specific connectivity targets we adopt here.
- Specific information on how much funding is needed to bridge those gaps in light of likely pricing for broadband services—both WAN and Internet—taking into account the significant new efficiency measures we adopt here, as well as general industry trends in broadband pricing over time.
- Further comment on the per-student and per-square foot budgets we have adopted for internal connections funding for funding years 2015 and 2016, whether these budgets should be continued in future funding years, and the closely related question of the \$1 billion funding target we adopt for category two services. Will these budgets be sufficient to meet schools and libraries needs for Wi-Fi and other internal connections?
- Comment on the sufficiency of the significant funding freed up by the reforms adopted herein to meet these needs. In particular, we seek comment on the extent to which focusing the program on broadband frees sufficient funding to meet long term connectivity needs.

We also seek comment on how the substantial reduction in the real purchasing power of the E-rate budget since the program's creation should affect our analysis. The E-rate cap was not adjusted for inflation between 1998 and 2010, and by most general measures, this resulted in an approximately \$800-900 million reduction in the real purchasing power of E-rate funding.

Ensuring That Multi-Year Contracts Are Efficient

We propose to limit E-rate support to eligible services purchased under contracts of no more than five years, including voluntary extensions. We propose to exempt from this requirement contracts that require large capital investments to install new facilities expected to have a useful life of 20 years or more.

- We invite commenters to revisit the issue of maximum contract length, and we seek comment on the benefits and drawbacks of our new proposal.
- We seek comment on whether there are particular E-rate supported services for which we should require shorter maximum contract lengths because the price of such services is so dynamic or for other reasons.
- We seek comment on what such services might be, and why we should require all contracts for such services to be less than five years, and how much less.

- o Are there services for which we should allow longer maximum contract lengths?
- What might such services be and why should we allow longer maximum contract lengths for such services?
- o How long should the maximum contract length be for such services?
- State and other master contracts: We seek comment on how this approach will affect schools' and libraries' current procurement processes, and in particular how it will affect their ability to purchase from state or other master contracts, service agreements, or joint purchasing agreements.
- Are there other reasons that we should allow E-rate applicants to purchase E-rate supported services using state and other master contracts, service agreements or joint purchasing agreements with terms that are longer than five years?
- Alternatives to maximum duration: We also seek comment on other ways to achieve our goal of ensuring that schools and libraries can take advantage of falling prices for E-rate supported services while minimizing administrative burdens.
- For example, would it be sufficient to require that contracts for E-rate supported services include a provision requiring the applicant to renegotiate the contract or otherwise seek lower prices at least once every five years?
- How could we ensure such renegotiation results in the best possible pricing for E-rate supported services? Alternatively, might we permit longer-term contracts for E-rate services if they include provisions that would help ensure that applicants enjoyed the benefits of declining prices of bandwidth and their likely increasing demand for it? Thus, should we allow a contract that sets a fixed price for an increasing level of bandwidths over the term of the contract, based on applicants' anticipated needs and the rapid declining price of bandwidth?
- **New builds:** We also seek comment on our proposal to allow longer contracts for services that require infrastructure build-outs.
- We therefore seek focused comment on how to ensure the most effective competition for the provision of new fiber builds, or other such infrastructure projects.
- Does the current E-rate program support for special construction charges separate from the charges for recurring services obviate the need for longer-term contracts?
- We also seek comment on whether the winner of an initial short term contract would likely face any serious competition over subsequent terms, once it had recovered its capital investment.
- We seek comment on whether a 20-year contract might be most likely to allow a service provider to amortize its installation costs once over the entire contract, while some indexing or similar arrangement could provide E-rate applicants with the increasing bandwidths they would likely desire over the period at no additional cost above the costs of upgrading the electronics to provide the higher bandwidth.

While we would require all new contracts executed after the effective date of the proposed rule to be in compliance, we seek comment on whether we should grandfather existing E-rate contracts, and if so, for how long a period of time.

- We also seek comment on whether, if we did not grandfather such contracts, we would have legal authority to require existing long-term contracts to comply with a limitation.
- We seek comment on whether, if we do have such authority, we should set a date by which parties would be able to amend existing contracts to comply with such a limitation, and if so, how much time we should allow for such amendments.

Standardizing the Collection of National School Lunch Program (NSLP) Data

We propose to standardize USAC's collection of NSLP data by requiring schools to use the NSLP information reported by state agencies to USDA's Food and Nutrition Service (FNS) and by requiring schools that participate in NSLP to use NSLP data for purposes of determining their discount rate.

- State Reported NSLP Data: We propose to require schools and libraries that use NSLP data to calculate their E-rate discount rates using the school district's NSLP information that is reported by their state agency to the Food and Nutrition Service of USDA.
- By November 15th of each year, after requisite income verifications are complete, states report their consolidated NSLP eligibility data to FNA using Form FNS 742 School Food Authority (SFA) Verification Collection Report.
- Currently, only some schools and libraries use state-reported NSLP data when calculating their
 discount rates and we propose to require schools and libraries to use state reported NSLP data on
 the basis that it should reflect the most accurate and verifiable accounting of a district's NSLP
 participation rate.
 - o Do all states and territories report NSLP data to FNS by November 15th every year?
 - o Is state reported NSLP data available on a district-wide basis and is it calculated in a way that is consistent with our new discount rate calculation rules?
 - o When does state reported NSLP data become available to schools?
 - State reported data for determining E-rate discount rates would always be a year behind.
 - O Should there be a process through which school districts can use more current information that is subject to the same level of review as the state reported NSLP data?
 - O What should that process be?
 - We also seek comment on how the use of state reported NSLP data impacts schools' and libraries' E-rate application process.
 - Would the use of state reported NSLP data provide an advantage for some school districts over others?
 - O Does the requirement to use this data unfairly favor certain types of applicants over others?
 - Are there additional reasons why state reported data would disadvantage schools or libraries or complicate the application process?
 - O How would schools and school districts participating in these alternative NSLP provisions (CEP and Provisions 1, 2 and 3) be affected by a state reported data requirement?
- Mandatory use of NSLP data for schools that participate in the NSLP: We also propose to require schools that participate in the NSLP to use their NSLP eligibility data when calculating their E-rate discount rate, and not be allowed to use a federally approved alternative mechanism, such as a survey, as a proxy for poverty when calculating E-rate discount rates.

Encouraging Consortium Participation

By aggregating purchasing across many schools and libraries, consortia can drive down the prices of Erate supported services. In the accompanying *E-rate Modernization Order*, we adopted changes to our rules to encourage consortium purchasing. In the interest of doing more to encourage consortia, we seek further comment on how to break down barriers to schools and libraries joining consortia. Specifically, we propose to change the way consortia discount rates are calculated and also seek comment on additional ways to encourage consortium participation.

Ensuring Support for Libraries is Sufficient

As part of our effort to ensure affordable access to robust connectivity for all libraries, we seek additional focused comment on the funding eligible libraries need in order to deploy robust LANs/WLANs within their buildings and the best method(s) to calculate libraries' internal connections budgets.

SCHOOL MEALS



Albuquerque Anchorage Atlanta Austin Baltimore Birmingham Boston Bridgeport Broward County Buffalo Charleston Charlotte-Mecklenburg Chicago Cincinnati Clark County Cleveland Columbus Dallas Dayton Denver Des Moines Detroit East Baton Rouge Fort Worth Fresno Greensboro Hillsborough County Houston Indianapolis Jackson Jacksonville Kansas City (MO) Little Rock Long Beach Los Angeles Louisville Memphis Miami-Dade County Milwaukee Minneapolis Nashville New Orleans New York City Newark Norfolk Oakland Oklahoma City Omaha Orlando

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Toledo Washington, D.C. Wichita Council of the Great City Schools
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http://www.cgcs.org

Support Letter for School Meals Waiver Provision in House Agriculture Appropriations Bill

June 10, 2014

U.S. House of Representatives Washington D.C. 20515

Dear Representative:

The Council of the Great City School, the coalition of the nation's largest central city school districts, supports the waiver provision in the FY 2015 Department of Agriculture Appropriations bill, which provides additional flexibility for school districts implementing the voluminous regulatory requirements of the federal school meals programs. The waiver allows school districts struggling to meet the many requirements and unreimbursed costs with an additional year to phase in the 2012 federal regulations. It also allows the school districts that made changes to school meal policies prior to the 2010 reauthorization to continue their implementation plans.

The Council consistently has supported both legislative and administrative action to provide flexibility in many of requirements of the 2010 reauthorization, including previous actions by the appropriations committees, Representative's Noem's authorization amendments (H.R. 3663), delays and revisions by USDA to its regulations, and dozens of pages of Council comments on six sets of proposed regulations from 2011 to 2014.

The primary problem for school districts in the federal school meals programs is the failure of the Federal government to pay for all of the requirements that schools are mandated to implement. A meager 6 cents additional reimbursement was provided for the school lunch program covering only a portion of the new regulatory costs, while <u>no</u> reimbursement at all was provided to implement the many new requirements for the school breakfast program.

Moreover, in the opinion of the Council, some of these regulations were excessive and could have been crafted in a more flexible and cost-effective manner based on the regulatory comments provided to the Department by the Great City Schools. Finally, cafeteria revenue would also be restricted by pending Department regulations, which go far beyond "junk food" limitations to also restrict otherwise allowable school meal items from being sold in the cafeteria as a la carte items in the same week (e.g., whole grain pizza). The combination of unreimbursed costs, unnecessary regulations, restrictions on cafeteria revenue, and multiple new sets of regulations each new school year place major burdens on the food service programs of the nation's public schools.

The waiver provision in the Agriculture Appropriations bill is helpful and a step in the right direction. Nonetheless, many school districts need further flexibility in their school meals programs. While the waiver directive from the FY 2014 Consolidated Appropriations Report would be preferable in its scope, the Council supports the flexibility, which the House Appropriations Committee can provide to school districts in the FY 2015 bill.

Sincerely,

Michael Casserly Executive Director

Michal Delouly

Email to USDA Staff Regarding Implementation of New School Meals Provisions

From: Jeff Simering

Sent: Thursday, May 22, 2014 3:18 PM

To: Margaret.Applebaum@fns.usda.gov; Nancy.Lyons@fns.usda.gov **Subject:** Belated Follow-Up to New Orleans Great City Schools discussions

Maggie and Nancy:

Sorry for taking so long to follow-up on the New Orleans meeting. Everyone felt your participation produced a very productive discussion. The Great City Schools Food Service Directors hopefully reflected their interest in running effective and healthy food programs in an efficient and compliant manner, without unnecessarily disrupting ongoing district operations.

We very much appreciate your willingness to engage in substantive discussions on a number of rather complex operational issues for our large urban programs.

In the interim since the April meeting, we have done a little homework and hopefully have focused the scope of the outstanding questions from the New Orleans discussions.

Community Eligibility

There is nearly universal interest among our food service directors in attendance at the meeting regarding participation in the Community Eligibility provision. Some, however, still have some barriers and concerns from their Title I colleagues and others to resolve on which our organization may be able to help them work thru.

Two lingering technical issues surfaced in the Community Eligibility discussions:

1) There was broad concern that USDA may have unnecessarily complicated the process of an alternative family income survey to determine individual household income levels in schools participating in the community eligibility provision. Our SFAs have established workable infrastructure and outreach processes over multiple years for securing family income surveys across our student population. The prospect of operating a second "non-USDA" family income survey for those school districts needing such "individual" family income information may now involve separate forms and possibly even different staffing. Our food service directors believe this prospect to be unnecessary and counterintuitive. With tens of thousands of "income-eligible" students, there is also a real likelihood of confusion for both families and school staff with two separate (though similar) surveys. For example, in many districts with both CE schools and non-CE schools would be given both a USDA-related income survey and a non-USDA income survey. Similarly, during the ongoing process enrolling thousands of new students in large urban districts each

year, staff will not know whether to give the parent a USDA-related form or a non-USDA form until the student is assigned to an available school or the parent selects a school. Moreover, any duplication of effort would be counterproductive.

<u>Proposed Solution:</u> Allow the <u>same</u> form to be used for surveying family income in both non-CE schools and in CE schools (for those districts that opt to implement individual family surveys for Title I, bus tokens, AP fees waivers, college admission fee reductions, etc.). The single form would be designated as a family income survey for "educationrelated benefits" which would specifically include USDA free and reduced priced meals as well as the other benefits listed above. This single form could also include the USDArequired disclaimer that in CE schools the failure to file the form would not affect the student receiving free school breakfasts and lunches. We see no imperative for requiring a separate USDA form for non-CE schools. Based on the proportionate number of FRPL student surveyed and CE students surveyed, the district would cost-allocate the expenditures and pay for the additional surveys of CE school families with non-USDA funds. This pragmatic solution would not disrupt the ongoing infrastructure and procedures for operating FRPL and SBP, allowing the use of a single form and existing staff, for which costs would be appropriate allocated to the food service account and non-USDA fund accounts. The integrity of the USDA school meals program would also be protected.

2. Further clarification is needed regarding how to calculate the non-federal claiming percentage to be contributed in schools below the 100% free reimbursement percentage. There are likely to be a number of ways to calculate the excess meal costs above the federal CE free claiming percentage.

<u>Proposed Solution:</u> The Council would encourage additional non-regulatory guidance from USDA to include a range of options for that calculation and examples of allowable methodologies. As suggested by one of our Food Service Directors, one fairly simple approach to be included among those calculation options might be to use the non-federal paid claiming percentage for determining the associated number of "paid" students multiplied times the USDA meal reimbursement rate. The guidance should also reflect the likelihood that the federal free claiming percentage may cover the total meal costs for the school, even if the school has less than 100% free claiming percentage.

Competitive Foods

There is broad support among our Food Service Directors for the Smart Snacks approach to campus-wide food sales, as well as broad concern about the challenges of implementing across the hundreds of schools in our districts. Our Food Service Directors recognize that other sectors of their public school community will have their operations – including revenue streams – disrupted by the new regulations. We are seeking practical ways to mitigate some of the negative effects on principals, PTAs, student groups, clubs, and others, in order to build support for the Smart Snack approach in these buildings and communities.

Again, two additional issues surfaced in the discussions which may be resolvable:

- 1) A California Food Service Director expressed frustration with his State Agency's denial of the SFA selling allowable Smart Snacks with a handling fee to the "student store" which resells these allowable food items. Unfortunately, the California State Agency has rejected this approach. In contrast, however, the December 12, 2013 USDA guidance memo SP 13-2014 (attached above) seems to specifically allow this cost-plus-fee mechanism for student groups. Some clarification would be helpful here.
- 2) The broader issue of "revenue sharing" is similarly addressed and prohibited in this same USDA guidance memo SP 13-2014. While the Council understands the basis for the memo, our Food Service Directors would like to be able to "help" our principals and school-related groups support the Smart Snacks initiative. To do so, some "good faith" attempt to recover lost revenue for the school principal or school-related groups would be a viable incentive to get on board willingly with the new competitive foods requirements i.e. revenue-sharing or the like.

Proposed Solution: Though it may be splitting hairs, the Council acknowledges that the HHFKA requires revenue from nonprogram foods sold on campus that have been purchased through the non-profit food service account must "accrue" to the non-profit food service account. But, once accrued to the non-profit account, nothing appears to prevent some amount of those revenues to be distributed to schools/school-related clubs to help offset lost or potentially lost revenue resulting from fundraising limitations and competitive food restrictions — with possible consideration of a caveat that only non-profit food service accounts with positive balances could provide such school incentives. This type of mechanism could also encourage principals to take steps to increase school meal participation (and revenue) through better scheduling of lunch periods and creative approaches to breakfast services.

Finally, we would like to again underscore that the frequency limits in the competitive foods regulations regarding previous menu entrees later served as a la carte entrees will negatively affect food service revenue and participation. Any loss of cafeteria revenue and participation is major concern given the increased costs of operating under the HHFKA.

The Great City Schools Food Service Directors are looking for pragmatic ways to deliver health meals within our existing school system and community structures. We think that these proposals suggest ways to more effectively meet the needs of students, schools, communities and school districts, while complying with key federal requirements. Please let us know if any of the above perspectives need further clarification.

Thanks for considering, and thanks again for facilitating a very productive set of discussions in New Orleans. Have a good Holiday.



Albuquerque Anchorage Atlanta Austin Baltimore Birmingham Boston Bridgeport Broward County Buffalo Charleston Charlotte-Mecklenburg Chicago Cincinnati Clark County Cleveland Columbus Dallas Dayton Denver Des Moines Detroit East Baton Rouge Fort Worth Fresno Greensboro Hillsborough County Houston Indianapolis

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April 28, 2014

Attention:

Comments on Proposed Rule for Local School Wellness Policy Implementation under the Healthy Hunger-Free Kids Act

Docket ID: FNS – 2014 - 0010 RIN 0584—AE25

Ms. Julie Brewer, Chief
Policy and Program Development Branch
Child Nutrition Division, Child Nutrition Programs
Food and Nutrition Service
U.S. Department of Agriculture
P.O. Box 66740
Saint Louis, MO. 63166-6740

Dear Ms. Brewer:

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, submits comments on the proposed Local School Wellness Policy rules published in the Federal Register on February 26, 2014. The Council finds that the proposed rules substantially exceed the requirements of the statute, and will be difficult and costly to implement in many of the nation's largest school districts. The Council strongly urges the U.S. Department of Agriculture (USDA) to roll-back the requirements of the proposed regulations to only what is expressly required under the Healthy Hunger-Free Kids Act (HHFKA).

Over the past few years, school districts across the country have been continuously challenged to implement multiple sets of new federal regulations under the HHFKA. Many of these new federal requirements for school-meal programs have no federal funding or reimbursement associated with the cost of implementing the regulations, including this pending Wellness Policy proposed rule, the Personnel Standards proposed rule, the Competitive Foods interim rule, and the Nutrition Standards and Meal Patterns final rule for breakfast programs. Even the final rule for the School Lunch Nutrition Standards and Meal Patterns provides a meager six cents additional reimbursement, an amount that is wholly inadequate to the costs of the new meal requirements. In the context of these unfunded and under-funded federal requirements for school meal programs, the Council requests the revisions recommended below to the proposed Local Wellness Policy rules reflecting only the requirements specified in the Act.

Moreover, the Council anticipates relatively broad confusion regarding the "promotional" aspects of the supplemental information preceding the proposed rule. This supplemental preamble in the Federal Register includes some twenty actions that are "encouraged" by USDA and dozens of examples of activities that schools "should", "may", "might" or "can" implement. While the Great City Schools are strong proponents of disseminating best practices in multiple ways, the Council contends that proposed rulemaking is not the proper forum for promoting particular approaches. USDA has ample opportunities for encouraging effective local wellness practices through technical assistance, Team Nutrition, the FNS blog, etc.

With the varying references to the LEA, district, and school in the proposed rule, it can be difficult to discern without careful reading what is a district requirement and what may be an individual school requirement. Additionally, USDA substantially exceeds statutory language by proposing a regulatory-created school-by-school annual progress report--which under the Act is neither annual nor school-by-school. Other than traditional school-level compliance responsibilities for the required districtwide Local School Wellness Policy, there are no separate school-level requirements under section 204 of the HHFKA. Therefore, there should be no separate school-level requirements in the Wellness regulations. Whether individual schools supplement the districtwide Wellness Policy should be a local decision not a federal regulatory decision.

Specific Comments on Provisions of the Proposed Wellness Regulations

Clarification Needed That Only a District-wide School Wellness Policy is Required, with School-Level Wellness Policies Being Optional. As indicated above, the background information in the Federal Register preceding the proposed regulations includes references to a local school wellness policy, local school wellness policies, LEA official(s), school official(s), district teams, local school teams, and addressing "the unique needs of each school". Switching references between the singular and the plural and between the LEA and school creates a lack of clarity in the proposed rule that can be misinterpreted by state and/or local officials who may assume that individual schools should have their own distinct wellness policies and separate goals. Some school districts may decide to develop individual school policies and plans, in addition to the required district-wide policy. However, the imprecise proposed regulatory language and expansive preamble could be easily misconstrued as school-level requirements as opposed to a district-level requirement. In the final rule, the Council suggests underscoring the singular nature of the statutory language, which only requires that the LEA "shall establish a local school wellness policy".

Recommendation: Revise the heading in 7 CFR 210.30 to read: "District-wide local school wellness policy." and in 7 CFR 210.30(a) insert "by the local educational agency" following "written plan"

The HHFK Act Does Not Require An Annual Progress Report for Each School. The proposed regulations far exceed the requirements of the HHFK Act by mandating an annual progress report for each school under the jurisdiction of the LEA. In sharp contrast, the Act requires the LEA to <u>periodically</u> measure and assess wellness policy implementation and compliance, including a description of the progress made in attaining the goals of the wellness policy. The Council notes that the HHFKA contains nearly two dozen references to requirements that are

"annual" and half dozen references to "periodic". If Congress had wanted "annual" progress reports, the Act would not have used the term "periodically" when measuring and assessing wellness policy implementation and progress.

Secondly, the Act requires the LEA – not the school – to periodically measure, assess, and describe implementation, compliance, and progress in attaining the goals. The LEA can meet this statutory requirement in the aggregate for all schools in the district without having to report separately on each individual school. Not only do the proposed regulations require a school-by-school annual progress report, but the proposed regulations also require a summary of the events and activities relating to wellness on each individual school. These regulatory-created requirements will impose a <u>massive</u> burden on large school districts, including many members of the Council of the Great City Schools that serve hundreds of schools within their jurisdiction. In general, school districts will struggle to meet this excessive regulatory requirement being proposed by USDA, unless the Department provides the resources for districts to build the necessary data systems to track and report the information.

Moreover, USDA inconsistently interprets the "periodically" requirement of subparagraph (A) of section 9(A)(b)(5) of the Russell National School Lunch Act to mandate an <u>annual</u> school-by-school progress report under clause (iii) of paragraph (A), while only requiring the assessment of compliance and the comparison to model wellness policies at least <u>every three years</u> under clauses (i) and (ii) of the same subparagraph (A). Apparently "periodically" is being interpreted to mean <u>every year</u> in clause (iii) but <u>not less than every three years</u> in clauses (i) and (ii). The Council strongly urges USDA to strike these instances of costly overregulation.

Recommendation: In proposed 7 CFR 210.30(e) --

- Revise paragraph (2) to read: "(2) Not less than every three years, report progress toward meeting the local school wellness policy's goals and include:"; and
- In paragraph (2) strike subparagraphs (ii) and (iii) and renumber subparagraphs (iv) and (v) as (ii) and (iii).
- In proposed 7 CFR 210.30(d)(3), strike "annual"; and in 7 CFR 210.30(f)(2) and (4) strike "annual".
- In 7 CFR 210.30(f)(3) and (4), strike "for each school under its jurisdiction".

Concur with Not Requiring Changes in Fixtures or Infrastructure under the Proposed Marketing Provisions; and Recommend Allowing Performance of Preexisting Contracts Entered into Prior to the Proposed Rule. A final rule should include the explanation in the Federal Register background information (FR at 10698) regarding marketing outside of school hours at the discretion of the LEA, as well as include an exception that would not require alteration or removal of fixtures or infrastructure changes, or changes to existing contracts entered into prior to the proposed rule. The current Federal Register explanation in the preamble is insufficient since it is not included in the rule itself.

Recommendation: Insert in proposed 7 CFR 210.30(c)(2) a new subparagraph (v) providing for the above exceptions regarding fixture and infrastructure changes, existing contracts, and after school hours "notwithstanding the other provisions of this paragraph".

Inconsistency in the Proposed Rules Regarding the Local Compliance Responsibility for Local School Wellness Policy Requirements, Which Should Be the Responsibility of the LEA, not the SFA.

The Wellness Policy requirements of the Act are much broader than merely the school district's meal programs. These Wellness requirements extend beyond the cafeteria to the entire campus of every school, and beyond student nutrition to health, physical activity, instruction, and promotion. The proposed 7 CFR 220.7(h) properly places the Wellness Policy compliance responsibility with the local educational agency (LEA) under the School Breakfast Program. However, proposed 7 CFR 210.18(h)(7) places compliance responsibility for the Wellness regulations with the school food authority (SFA), instead of the LEA, during the Administrative Review process for the National School Lunch Program. Wellness Policy compliance should be the responsibility of the LEA, as the governing entity, regardless of whether the State Agency or USDA is reviewing the School Lunch Program or the School Breakfast Program.

Recommendation: In proposed 7 CFR 210.18(h)(7) strike "school food authority" and insert "local educational agency".

Finally, the Council recommends a full school year for transition to the final Wellness Policy regulations when issued.

Please let me know if there are questions regarding the Council's comments. I can be reached at mcasserly@cgcs.org or at 202-393-2427, or contact Jeff Simering at jsimering@cgcs.org or at the same phone number. Thank you.

Sincerely,

Michael Casserly Executive Director

Michal Dearly



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April 7, 2014

Attention: Comments on Proposed Rule for Professional Standards for School Food Service Program Personnel under the Healthy, Hunger-Free Kids Act

FNS - 2011 - 0030 RIN 0584—AE19

Ms. Julie Brewer, Chief Policy and Program Development Branch Child Nutrition Division Food and Nutrition Service U.S. Department of Agriculture P.O. Box 66874 Saint Louis, MO. 63166

Dear Ms. Brewer:

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, submits comments on the proposed rule issued in the Federal Register on February 4, 2014 regarding professional standards for federal school meals programs. The Council participated in the March 2012 focus group meetings with other stakeholders on this subject held by the Food and Nutrition Service (FNS). Despite the public input opportunities provided by FNS, the Council finds the proposed personnel standards to be conceptually questionable and unnecessarily expansive. The Council hopes that our comments will provide a simpler, internally consistent, and more viable approach to the personnel standards criteria envisioned by Congress in section 306 of the Healthy and Hunger-Free Kids Act (HHFKA).

Food Service Personnel Hiring Qualifications

<u>Proposed Rule Transforms A "Minimum" Qualifications Standard into Four Different</u>
<u>Qualifications Standards for Implementing the Same Regulatory Structure in All School Meals Programs.</u>

Even though the staff of every School Food Authority (SFA) must implement identical federal nutrition standards, the same federally-required meal patterns, analogous competitive food restrictions, basic wellness policy parameters, the entire federal school lunch and breakfast regulatory regime, and all applicable health, safety, and labor law requirements, the proposed rule establishes an uneven hierarchy of professional standards with lower standards for school districts serving less than 2,500 children and increasingly top-heavy standards for school districts of medium, large, and extra-large enrollments of students.

Although Congress sought only "minimum" requirements "necessary to successfully manage the school lunch program ... and the school breakfast program," FNS has transformed a "minimum" qualification standard into four different qualification standards dependent on district enrollment levels. It is hard to envision that Congress intended lesser basic staff qualifications for children enrolled in districts with few schools, compared with children enrolled in districts with larger numbers of schools. A basic set of staff qualifications for all districts is all that is needed in this regulation. All districts should be appropriately staffed with personnel that can provide the same essential protections for all children in the handling, preparation, and serving of school meals regardless of district size. If a high school diploma is acceptable for small school districts, then the same minimum requirement should be sufficient for any other school district. If a bachelor's degree is necessary for managing school meal programs in large and very large school districts, then lesser qualifications cannot be justified for serving children solely because their school districts have fewer schools. FNS should set minimum standards as required by statute without additional embellishment.

<u>Recommendation</u>: Establish a true minimum education standard for all districts by consolidating proposed 7 CFR 210.30(b)(1)(i)-(iv) into a single provision and requiring at least a high school diploma and some college coursework. (Note the related recommendations below for increased food service management experience and for flexibility in special circumstances.)

Proposed Rules Fail to Require *Any* Food Service Management Experience for Large and Very Large School Districts, and Only Minimal Experience for Medium-Size Districts.

School food service directors require multiple skill sets to manage school lunch and breakfast programs, even in small school districts with only a handful of schools. Logistics ranging from ordering to waste disposal, budgeting, personnel management, compliance, health and safety protocols, and program leadership are only a few of the required competencies of a SFA director. And frankly, most of these skill sets cannot be acquired just by completing college coursework. Yet, the proposed rules would allow a newly-minted college graduate to run a food service program in large or very large school districts without any food service management experience whatsoever. Under the proposed rules, USDA appears to value academic qualifications more than practical food service management experience. Given the multiple competencies essential for directing a school food service program, the Council contends that relevant institutional food service management experience may be more important than academic coursework. The Council notes that the proposed rules establish a minimum of five years of experience to be coupled with a high school diploma as qualification criteria for districts of less than 2,500 children (some 12,000 of the nation's 18,000 school districts). The final rule should shift emphasis to more relevant management experience for directors in all school districts, coupled with a true minimum education requirement and annual training/continuing education criteria.

<u>Recommendation</u>: Establish a pragmatic food service management experience standard for all districts by consolidating proposed 7 CFR 210.30(b)(1)(i)-(iv) into a single provision and requiring at least 3 years of institutional food service management experience for a SFA director.

Provide Flexibility for Special Circumstances in the Final Rule.

Even with the benefit of rulemaking notice and comment, federal regulations cannot anticipate all of the circumstances among the thousands of SFAs to which the regulations apply. Just the commonplace loss of a district food service director and the need for an interim director could place some LEAs in noncompliance under the proposed qualifications requirements. Other circumstances such as a narrow applicant pool in a remote LEA or an applicant with exemplary food service management experience but limited college coursework could result in the inability to hire the best candidate. The final rule should be crafted to accommodate such special circumstances, possibly with state approval. Overly rigid federal regulations could be counterproductive to ensuring practical program outcomes -- in this instance, operationally qualified school food service personnel.

Recommendation: Add a new subparagraph (__) to 7 CFR 210.30(b)(1) as follows: "(__) Modification of Hiring Standards for Special Circumstances. With approval from the State agency, a local educational agency may modify the hiring standards under this paragraph for educational and food service work experience due to special circumstances, such as the need to hire an interim director, a limited pool of qualified applicants, or a particularly strong candidate."

Training and Certification

Proposed Training Requirements May Be Workable Provided That Multiple Modalities, Delivery Systems, and Providers, including LEA Personnel, May Be Used to Develop and Deliver Training; and that a Certification of Successful Completion of Required Training/Continuing Education Will Meet the Annual Certification Provision of the HHFKA.

New training and professional development requirements for school personnel add to work schedules and the costs of operations for school districts. The extensive training/continuing education requirements in the proposed rule for all LEAs (including the prior training requirement) may be workable, provided that the assurance of flexibility referenced in the background section of the proposed rule (FR at 6493) will allow for a variety of providers (including SEAs and LEAs for in-house training), as well as allow for training through multiple modalities, platforms, and delivery systems. The proposed regulation, however, does not include the flexibility description from the background material in the Federal Register, thereby providing no actual assurance of the referenced flexibility. Finally, the Council concurs with the proposed rule [7 CFR 210.30(g)] that the LEA certification of successful completion of the annual training/continuing education requirements for food service staff fulfills the requirements of section 7(g)(2)(B) of the Child Nutrition Act.

<u>Recommendations</u>: Insert in proposed 7 CFR 210.30(f) after the heading: "Continuing education/training may be provided in various forms, platforms, and delivery systems, and by a variety of providers, including in-house by the State or local educational agency." Retain proposed 7 CFR 210.30(g).

Proposed Rules Require Unnecessarily Repetitive Training Sessions, and Should Be Revised to Reflect the Wide Range of Appropriate Training Topics, Rather Than Relying on Continual Topic Updating by Informal USDA Guidance, Memos, or the Like.

Although school food service programs experience staff turnover, there are numerous school food service personnel that work in lunch and breakfast programs for multiple years. The proposed rule appears to require annual training in administrative tasks including applications, certifications, verification, meal counting and claiming, and the identification of reimbursable meals. Multi-year school food service employees from directors and managers to all other food service staff would receive this same subject matter training year after year under the proposed rules. In years when these federal requirements have not changed, this training would be duplicative, likely superfluous, and unnecessarily costly. LEAs should have the flexibility to cover other training areas for employees who have already received training in the topics above. The proposed rule also fails to list a full range of topics appropriate for training activities, instead relying on an open-ended reference to "any other appropriate topics, as determined by FNS". Effective local management practices often depend on multi-year plans for building local capacity. The reliance of a potentially "changeable" set of approved training topics (beyond the narrow list of application and claiming practices, nutrition, health and safety) fails to recognize the local level need for regulatory/guidance consistency and flexibility in ongoing professional development from year to year. USDA/FNS should significantly expand the permissible training topics enumerated the final rules.

Recommendations: Add a new subsection (f) in proposed 7 CFR 210.30 and redesignate other subsections accordingly: "(f) Exception for Completed Training. School food service staff having previously received training in any required topic under this section will not be required to participate in analogous training content at the discretion of the local food service director." And, add a more extensive list of permissible training topics for program directors, managers, and all staff in proposed 7 CFR 210.30(b)(3), (c), and (d), immediately preceding "any other [appropriate] topics, as determined by FNS" in each instance where that phase appears.

Opposition to USDA Development of a Multi-layer "Certificate" Program Beyond Minimum Food Service Qualifications.

The background material to the proposed rule (FR at 6492) indicates that FNS is developing a "certificate" program, which appears to exceed the statutory minimum training and continuing education requirements and establishes a hierarchy of training levels to recognize food service personnel opting for more advanced levels of training. The Council suggests that USDA/FNS resources could be better directed toward assisting LEAs in the implementation of the complex regulatory requirements of the HHFKA, rather than developing and providing multiple levels of federally-approved coursework and associated federal certifications. Moreover, this certificate program appears to duplicate other certificate programs run by NFSMI, State agencies, national and state organizations, and others.

State Agency Personnel Qualifications

Council Offers No Opinion Regarding the State Agency Qualifications Requirements of the Proposed Rule. The Council references the recommendations and concepts contained in the above comments, but offers no opinion regarding the proposed rules for the qualifications of the State agency director or other state staff.

Other Provisions

Specific Proposed Rule Provisions in which the Council Concurs.

The Council agrees with the use of the broader term "LEA" in the proposed rule, reflecting the actual unit of local government with authority over the SFA and its staff. The Council supports the "grandfathering" provisions of the proposed rules regarding current staff. The Council also appreciates the clear statement regarding the use of food service funds for training costs. And, as referenced above, the Council concurs with the proposed rule [7 CFR 210.30(g)] that the LEA certification of successful completion of the annual training/continuing education requirements for food service staff fulfills the requirements of section 7(g)(2)(B) of the Child Nutrition Act.

The Council believes that the final rule should reflect the minimum qualifications necessary to produce the multiple competencies that are essential for operating complex and highly-regulated school food service programs. While large urban school districts can rely on professional Human Resource Departments to ensure experienced practitioners will run our food service programs, the Council contends that the final rule applicable to all school districts should place a greater emphasis on relevant work experience in institutional food service management. While the Council recognizes that school food service practitioners may seek to promote increased academic requirements and credentialing in order to build "the profession", the USDA's regulatory framework should remain focused on the basic competencies for SFA directors that are generally acquired through multiple years of relevant experience.

Please let me know if there are questions regarding the Council's comments. I can be reached at mcasserly@cgcs.org or at 202-393-2427, or contact Jeff Simering at jsimering@cgcs.org at the same phone number.

Sincerely,

Michael Casserly Executive Director

Michal Delany

EARLY CHILDHOOD

Comments of the Council of the Great City Schools on the Preschool Development Grants

Preschool programs are a high priority for many of the nation's Great City Schools. The Council of the Great City Schools believes that building preschool program capacity within a State under the directives of the FY2014 Consolidated Appropriations Act requires providing high-quality preschool services to <u>additional</u> children below 200% of the federal poverty line. The Council finds that the Draft Expansion Grant program requirements appropriately reflect this critical directive, but the Draft Developmental Grant program requirements do not. The Council provides specific comments below on this key issue of serving additional eligible preschool children, and on other draft priorities, requirements, and criteria in order to improve the operational elements of the Preschool Development Grants.

Support for the Expansion Grant Absolute Priority #1 for Subgranting 90% of Funds.

The Council strongly agrees with the Absolute Priority #1 for Expansion Grants to subgrant 90% of the federal grant award to local preschool programs in order to serve additional eligible children in high-need communities. This Absolute Priority properly reflects the statutory directive from the appropriations bill.

Revise Development Grant Absolute Priority #1 to Ensure Additional Eligible Children Are Served.

Absolute Priority #1 for Development Grants does <u>not</u> require or ensure that <u>any</u> additional low-income preschool students are served by State grantees until the fourth year of grant funding. The Council is concerned that \$240 million over three years (\$80 million per year) could be spent by the states in Development Grants without serving a single additional child. The vast majority of the Development Grants, in the Council's opinion, should be spent on additional preschool slots for low-income children.

Recommendation: In the Development Grants Priority #1: Absolute Priority strike in provision (2) "No later than year four of the grant period, if not in earlier years--" and insert "Over the four year grant period--"; and in provision (2)(a) strike "90%" and insert "50%".

Require All Grant Applications To Directly Address Absolute Priority #1.

The Council is puzzled why the Departments would set an Absolute Priority for serving a specified level of additional eligible children through the subgrant process, and then preclude the State grant applicants from directly demonstrating that they have met or exceeded additional child service and subgrant funding levels. To assume that the peer reviewers will infer or interpret from the totality of the grant application that the State applicant has met this critical Absolute Priority without any direct narrative in the application seems convoluted and unresponsive.

<u>Recommendation</u>: In both Executive Summaries under Priorities/Absolute Priorities[y], strike "States do not write directly to [the] Absolute Priority [1]" and make other conforming revisions.

Potential Abuse of Vague "High-Need Community" Definition.

The definition of a "High-Need Community" in both Executive Summaries allows states nearly unfettered discretion to determine where Preschool Development subgrants will be awarded. The history of inequitable state treatment of poor and minority communities is well documented, and should be constrained to the greatest extent possible in the Preschool Development Grant process. The statutory focus on low-income families below 200% of the poverty level suggests that "high-need" should reflect concentrations of low-income children.

<u>Recommendation</u>: Strike the High-Need Community definition and insert "<u>High-Need Community</u> means a jurisdiction which falls either within the highest quintile of jurisdictions in a State based on the number of children (or preschool children) in families below 200 percent of the poverty line or falls within the highest quintile based on the percentage of children in families below 200 percent of the poverty line."

Add Clarification to Subgrantee Definition that an LEA is an Allowable Subgrantee Consistent with the FY 2014 Consolidated Appropriations Act.

The legislative authority for this program specifically references LEAs as potential subgrantees of the State. Yet, the "Subgrantee" definition on the final page of both Expansion and Development Grant Executive Summaries fails to include LEAs.

<u>Recommendation</u>: In the definition of Subgrantee strike "an Early Learning Provider" and insert "a Local Educational Agency or other Early Learning Provider".

Multiple and Costly Federal Programmatic Requirements Established Through Definitions and Cross-Reference to Systems, Standards, Guidelines and Recommendations of External Organizations.

The Council is concerned with the extensive program requirements enumerated in the Draft Preschool Development Grant Executive Summaries. These requirements are detailed through specific provisions, multi-component definitions, and references to systems, standards, guidelines, and recommendations issued by external organizations. The requirements include: a full range of comprehensive services as well as health promotion for parents and children; additional elements for data systems including program structures, staffing, compensation, and work environment; ambiguous domains and approaches to learning; new staff qualifications; staff-child ratios; class-size parameters; salary requirements; etc. The result is a seemingly restrictive and costly federal grant framework that diverts funds toward meeting multiple program requirements and constrains the number of additional preschool slots that can be financed with grant funds.

<u>Recommendation</u>: Modify, delete, or revise as many of the programmatic requirements in the Executive Summaries as possible.

Lack of Statutory Basis to Require Comparable Salaries for Preschool Staff.

The Council objects to the requirement in the draft Executive Summaries mandating comparable salaries for preschool instructional staff in relation to K-12 teachers. The Council can find no statutory basis for adding a "comparable salary requirement" for preschool staff, and no analogous example of a federal department mandating salary parameters for a particular occupation absent legislative authority (in contrast to the statutorily-based Davis-Bacon prevailing-wage requirements for federal construction projects).

<u>Recommendation</u>: In the definition of High-Quality Preschool Program strike provision (i) regarding comparable salaries for preschool staff.

The Council urges the Departments to ensure that these funds provide preschool services to a significantly greater number of eligible children in high-need jurisdictions, and that outcomes be primarily evaluated on the kindergarten readiness using a disaggregated subgroup methodology. The greatest ECE need among large urban school districts is for additional funding to serve additional preschool students. Rolling back some of the proposed program requirements in the Draft Executive Summaries is essential to empowering States and local subgrantees to serve more eligible children.

Submitted via http://www.ed.gov
Jeff Simering, Council of the Great City Schools
May 16, 2014

SCHOOL IMPROVEMENT GRANTS



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October 8, 2014

Attention: Comments on Proposed Requirements for School Improvement Grants ESEA Title I

Docket ID ED—2014—OESE—0079 RIN 1810—AB22

U.S. Department of Education 400 Maryland Avenue, SW Washington D.C. 20202

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, submits comments on the Proposed Requirements for School Improvement Grants (SIG) published in the Federal Register on September 8, 2014. The Council has long supported the strategic targeting of instructional interventions in low-performing schools.

The Council has collected data and survey information on the implementation and outcomes for urban schools participating in the School Improvement Grant program, as well as conducted a number of follow-up case studies. The Council has found generally promising results from the School Improvement Grants since the Recovery Act of 2009, including largely positive results among SIG schools in urban districts. The Council's analysis finds about two-thirds of SIG schools making greater academic progress than similar non-SIG schools. The Council's findings are comparable to the Education Department's analysis of initial SIG outcomes at the state level. The impact of the increased investment since 2009 of up to \$2 million in some schools, compared to as little as \$50,000 under prior SIG awards, has provided a unique opportunity to expand and intensify SIG interventions and support, and may help explain some of the positive results.

At the same time we have not seen substantial differences in outcomes between the two main SIG models, possibly because the SIG models primarily emphasize structural and personnel changes rather than instructional reforms. Moreover, the school-byschool improvement approaches evident across the country demonstrate massive variability in instructional strategies and interventions, making any delineation of what seems to work and what did not difficult to determine.

This school-by-school improvement approach not only has led to great variability in interventions and strategies, but has also resulted in a lack of district-level direction and coordination that has complicated the prospects for sustainability and integration into systemic reform efforts.

Finally, the extraordinary number of states that have changed their testing regimes over the grant period makes it almost impossible in many locations to ascertain what the effect of SIG actually was.

The Council's comments are built on our recent analyses, as well as some fifteen years of experience in implementing ESEA School Improvement Grants in the nation's Great City Schools.

SPECIFIC SIG COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

Comments on New and Revised Statutory-Related SIG Requirements

Overly Prescriptive Requirements for the New State-Determined Intervention Model.

The State-Determined Intervention Model included in the FY14 appropriations legislation authorizes additional approaches to improving low-performing schools. The Council contends that the proposed state-selected models should be based on substantial evidence that the approach can remedy the academic deficiencies that caused the school to be identified as persistently low-performing or a priority/focus school. Since there are already four structural reform models (which include a number of instructional elements) in place under the Department's current SIG requirements, there appears little justification for requiring elements of the Turnaround or Transformational Model under a new State-Determined Model. Nonetheless, the Council acknowledges concerns that instructional approaches promoted in some States can be of questionable value and often have limited evidence of effectiveness (e.g., the "singing curriculum" promoted by one State for use in the State's low-performing elementary schools). A rigorous review of any proposed new model might mitigate this problem.

In order to secure the required approval of the Secretary – a discretionary function – the State should carry the burden of demonstrating by substantial evidence the academic effectiveness or promising outcomes from the proposed model in reading/language arts and math performance among low-performing schools. The portions of the proposed criteria II.B.1(b)(4) regarding strengthening a school's instructional program should be emphasized and the other requirements should be better focused on improving areas that triggered SIG identification of the school. The Council believes that there may be benefits to implementing other instructional approaches in low-performing schools that have sufficient evidence to hold promise of positive results. It also seems pointless to require the replication of existing models under the proposed requirements of the new State-Determined Model.

Recommendation: Strike the proposed requirements in section II.B.1(b)(1)-(7) (inclusive of the Note), and insert: "(1) Review the performance of the school, including its leadership, teachers and other staff, curriculum, and environment; (2) Address the weaknesses of the school that resulted in identification of it as a persistently low-achieving school or as a priority or focus school; and (3) Strengthen the school's instructional program by ensuring that it – (A) Is evidenced-based, rigorous, and aligned with State academic content standards; (B) Meets student needs; (C) Is implemented with fidelity; and (D) Provides timely information to inform instruction and allows for appropriate modification and continuous improvement. Note: A State-determined intervention model also may include elements of the Turnaround or Transformational Models, but may not require a restart or closure approach except in the case of an official state takeover."

Questions Regarding the Whole School Reform Model.

The discussion in the Federal Register of the congressional authorization supporting the new Whole School Reform Model appropriately suggests the prospect that no whole school strategy would meet the evidentiary standard of more than one experimental or quasi-experimental study of effectiveness, and be comprehensive enough to address the variety of other school-wide factors cited in the congressional committee report as well. Since whole school reform approaches can be undertaken within other allowable SIG models, the Council supports merely replicating the authorization and report language in the final SIG requirements. Any districts and others seeking funding under the Whole School Model should shoulder the burden of demonstrating that they have met standards of evidence and comprehensiveness. The Council also strongly supports the SIG Evidence of Strongest Commitment requirement demonstrating effectiveness of a Whole School Model with a population and in a setting similar to the school to be served [section I.A.4(a)(10)(A)].

Defining "Greatest Need" for SIG Funding, and Priorities for SEA Awards to LEAs.

The Council agrees with modifying requirements for accommodating both ESEA waiver and nonwaiver states. There is another important clarification under the SIG funding priority process that should be addressed in the final requirements. A contributing reason for approximately one-third of SIG schools not making academic progress is the definition of "greatest need" in the SIG requirements and its lack of flexibility in the application and award of SIG funds to LEAs. In our performance review of the program, the Council noted that a variety of "alternative schools" and "specialized schools" have been identified as persistently low-performing in the initial cohorts of SIG schools. The Council has previously pointed out to the Department that many alternative schools and specialized schools for students with severe disabilities or similar centers within schools were being identified under the lowest 5 percent criteria or the priority and focus criteria in many states. These schools with short-term student populations or offender programs, or students with severe cognitive disabilities do not fit a reasonable profile of a persistently under-performing school. In the latter instance, these students do not take the same college and career-ready assessments to determine performance and growth. The Council believes that identifying these alternative and specialized schools is not appropriate for the purposes of the School Improvement Grant Program, and negatively skews the overall academic outcomes of the program nationally. The Council recommends LEA and SEA flexibility in the identification and priority funding of SIG schools to avoid inappropriate labeling of these schools.

Recommendation: In section I.A.1, add a new provision (f) as follows: "(f) <u>SEA and LEA Flexibility</u>: At its option, an SEA may chose not to identify or prioritize an alternative school or a specialized school serving students with severe cognitive disabilities under sections I.A.1(a)-(e) as a persistently under-performing school or as a priority or focus school. An LEA, at its option, may choose not to apply for funding to serve these alternative or specialized schools, and may prioritize other schools identified by the State in applying for School Improvement Grant funds."

Integrate SIG School Interventions into Systemic Reform Efforts through Significant Revisions to the "Strongest Commitment" Requirements. The Council has noted that interventions and activities in SIG schools are frequently not well coordinated with systemic districtwide reforms, and that independent actions among SIG schools have been encouraged at times by SEA representatives without adequate coordination with the district. Moreover, elements of certain SIG models can be misinterpreted in a way that constrains the role of the LEA and its ability to define, direct, and coordinate interventions in its schools. More importantly, the lack of district-level direction and coordination can add inconsistency to systemic reform efforts, and complicate the prospects for SIG

sustainability. In short, the SIG program has often ignored local system-wide reform initiatives in order to implement elements of some SIG models that had little evidence of effectiveness. Granting substantial autonomy for multi-faceted school-level operations to a new principal and a largely new staff who have yet to produce academic results and may not have the capacity to do so seems questionable at best. The Council, therefore, strongly recommends adding requirements for LEA-level direction and coordination of SIG activities. The Department's proposed new LEA oversight and support provision [section I.A.4(a)(7)] is inadequate alone to remedy this problem without additional design, direction, coordination, and implementation recommended here by the Council.

Recommendation: In section I.A.4(a)(1) strike "intervention for each eligible school --" and insert "interventions and other activities in each school improvement plan --". In section I.A.4(a)(2) strike "interventions consistent with these requirements;" and insert "interventions and other school improvement activities consistent with LEA systemic reform efforts and in coordination with and under the direction of the LEA;".

New Five-Year Award Provisions Appear Reasonable and Appropriate to Aid Sustainability.

The Council supports the provisions addressing the five-year award/renewal process for SIG funding.

Support for the SIG Requirement That Enumerates the 5% SEA Limitation on State Administration, Evaluation, and Technical Assistance Expenses. The Council supports the explicit SIG requirement (section II.D) limiting SEA reservation of funds to no more than 5 percent of SIG funds for state-level administration, evaluation, and technical assistance expenses, even though this same 5 percent limitation is expressed in the statute.

Comments on New and Revised Administratively-Established SIG Requirements

<u>Support for the Elimination of the Rule of Nine.</u> The Council supports eliminating the "Rule of Nine." Council analysis of SIG data indicates no significant difference in academic performance or improvement between schools implementing the Turnaround Model and the most frequently-adopted Transformational Model. Therefore, we find no justification for continuing this administrative limit on the Transformational Model under the Rule of Nine.

Add the Option of Starting Up a Magnet School to the Rarely-Used Restart Model. The Restart Model along with the Closure Model are the most infrequently-adopted strategies under the School Improvement Grant Program. The Council strongly recommends adding an option of converting, or closing and reopening, a formerly low-performing school as a Magnet School. The SIG program could provide the necessary start-up funding typically needed to restructure the focus, curriculum, and staffing for a Magnet School. Moreover, a Magnet School could foster the diversity of students that is too often missing in charter school recruitment and enrollment.

Recommendation: In section I.A.2(b)(1), strike "under a charter" and insert "as a Magnet School or under a charter".

Proposed Early Learning Model Is Not Appropriate as a School Turnaround Strategy Under Title I Section 1003 and Is Unnecessarily Prescriptive. Building a preschool program in a persistently low-performing school does not address the overall academic weaknesses that were responsible for the school's identification by the State. The early learning strategy, in fact, places the instructional emphasis on a new cohort of young children, rather than focusing on the current students whose under-performance is the statutory target of the Title I school improvement grant program. Moreover, a new set of preschool students in year 1 of SIG funding would have only completed first grade after the initial three years of SIG funding, and could not produce the academic progress on the leading SIG performance indicators necessary for a P-5 school as a whole to warrant an additional twoyear renewal of their SIG program. The Council supports expanded preschool efforts, but the language in the proposed regulation does not make sense. Finally, the extensive and costly proposed requirements for a "high-quality preschool program" exceed the Title I authority by mandating salary levels for preschool staff that are comparable to certified teachers, in addition to requiring comprehensive health and social services. The Council believes that the current Preschool Development Grants are sufficient to test the efficacy of this early learning approach without adding a narrowly-focused model to the School Improvement Grant Program.

Recommendation: Strike the Early Learning Model in section I.A.2(f), and the high-quality preschool definition in section I.A.3.

Support the New Requirement of LEA Responsibility for Recruitment, Selection, and the Accountability of External Providers. The fact that the Department has determined a need for this new SIG requirement expressly placing the responsibility for the recruitment, selection, and performance of external providers with the LEA, and not the SIG school, underscores the excessive autonomy exercised by some SIG schools in contracting with "experts" without appropriate school district involvement. This new requirement is symptomatic of an undue independence that some SIG schools believe accompanies their selection. The Council generally does not support adding further requirements to the already prescriptive SIG framework, but this new requirement on external providers [section I.A.4(a)(4)] is warranted.

Multiple Measures for SIG Teacher and Principal Evaluation Should be Permissive Rather Than Mandatory in Order to Reduce Federally-Required Assessment Practices. The Council concurs that determining teacher and principal performance levels for evaluation purposes and for personnel decisions is an appropriate component of the Transformational and Turnaround Models, and that student growth on the state assessments should be included. However, the decision should be left to States and LEAs to determine whether and what type of "multiple" measures would be used to evaluate staff. The current and proposed federal SIG requirements stipulate an unspecified number of multiple measures of performance, thereby contributing to an extensive framework of national, state, and local assessments now being roundly criticized. The Council recommends that multiple measures beyond the state academic assessments be permissive, rather than mandatory under the final federal SIG requirements. They should also be reconsidered under the Department's ESEA flexibility initiative as well.

Recommendation: In section I.A.2(d)(1)(A)(ii)(3), strike "Use multiple valid measures in determining" and insert "Validly determine", and strike "other measures" and insert "which may include other measures".

<u>Alternative Measures of Student Learning and Performance in Grades and Subjects Not</u> Assessed Under ESEA Should be Permissive Rather Than Mandatory in Order to Reduce

Federally-Required Assessment Practices. The current and proposed federal SIG provisions requiring the determination of student growth not only in grades and subjects specified in ESEA, but also in grades and subjects in which state academic assessments are not required, further contributes to the number of assessments that are now criticized nationwide. The federal requirements under SIG as well as under the ESEA flexibility initiative require alternative measures of student learning and performance in at least five grade levels and multiple additional academic subjects not otherwise required in ESEA. This appears to have contributed to an unnecessary array of pre-tests, end-of-course tests, ECE and kindergarten assessments, performance assessments, portfolio assessments, student learning objectives, interim assessments, formative assessments, and other measures of student achievement. These decisions should be left to state and school district officials. The inadequate performance in reading, language arts, and math that triggers State identification of SIG schools should be the primary focus of the federally-required school improvement activities without mandating actions or assessments in other grades and subjects that is having unintended side effects. The Council, therefore, recommends that the alternative measures of student learning and performance in grades and subjects not required to be assessed under ESEA be permissive, rather than mandatory under federal SIG requirements. This requirement should be reconsidered under the Department's ESEA flexibility initiative as well.

Recommendation: In provision (b) of the definition of Student Growth under section I.A.3, strike "For grades and subjects" and insert "At the option of the SEA or LEA as appropriate, for grades and subjects".

<u>Support for the SIG Flexibility Provisions.</u> The Council supports the flexibility provisions for SEAs and LEAs in section I.B, and in particular for LEAs where the state does not seek the flexibility.

Flexibility to Substitute a Focus School with Greater Needs for a Priority School. There will be instances where an LEA has already targeted an identified Priority School(s) with significant interventions, or has a Focus School(s) that has greater needs for reform than a state-identified Priority School. The SIG program should not be unnecessarily rigid in its requirements and should allow an LEA with State approval to substitute one or more Focus Schools for identified Priority Schools in its application for SIG funding. LEAs will know where the greatest needs exist within their systems and should be permitted this flexibility with State approval. Moreover, by directly substituting a Focus School for a Priority School, no LEA will be able to "game" the system in order to increase the number of schools receiving SIG funding from the state.

Recommendation: In section II.A.7, insert the following sentence after the period: "With State approval, an LEA may apply for one or more focus schools in place of an equal number of priority schools if the LEA can provide a reasonable justification, such as a Focus School having greater needs or a Priority School already receiving targeted interventions." In section II.B.7 strike "If an SEA" and insert "Subject to section II.A.7, if an SEA".

Comments on Current SIG Requirements Needing Revisions, and Provisions Warranting Support

<u>Models.</u> The Council strongly supports the current and proposed requirement (section II.B.4) that prohibits a State from requiring an LEA or school to implement a particular SIG intervention, thereby properly placing the primary reform responsibility at the local level where the children are served -- except in the case of an official state takeover.

Revise the Provisions of the Transformational Model to Clarify the Necessity of Coordination and Support from the LEA Level. The Council has found too many instances of SIG schools claiming operational autonomy because they misinterpreted federal SIG requirements. This results in uncoordinated and at times ineffective interventions and other actions without the direction and guidance of the school district. Such perceived school-level independence is particularly questionable with new school leadership and a majority of new staff who may not have established a track-record of positive results or do not yet have the capacity to produce such results. These circumstances are unfortunately widespread and have occurred over multiple years and cohorts -- at times with apparent concurrence of SEA representatives. The Council, therefore, recommends a revision in the "operational flexibility" provision of federal SIG requirements to remedy this often unproductive consequence of SIG status.

Recommendation: In section I.A.2(d)(4) strike the heading and insert "<u>Providing Sustained</u> <u>Operational Support</u>", and in section I.A.(d)(4)(A)(i) strike "Give the school sufficient operational flexibility (such as staffing, calendars/time, and budgeting)" and insert "Work with the school in operational areas such as staffing, calendars/time, and budgeting".

Consolidate All Permissible Activities into a Single Provision under the Transformational Model in Order to Clarify What Is Federally-Required and What is Not. There are more than a dozen of "Permissive Activities" within the four elements of the Transformational Model. In order to clearly delineate what is federally-required and what is not, the Council recommends consolidating these multiple provisions into a single section on permissible activities.

Recommendation: Consolidate sections I.A.2(d) (1)(B), (2)(B), (3)(B) and (4)(B) at the end of proposed section I.A.2(d).

Clarify the Permissibility of Funding Feeder School Activities with SIG Funds. A number of Great City School districts sought to include targeted interventions in feeder schools that were the primary pipeline for students enrolling in a SIG school, but were prohibited from doing so. Regardless of whether this is a problem with federal requirements or state implementation, the Council recommends including in "Permissible Activities" under the Transformational Model targeted feeder school interventions. Including feeder school activities under the Transformational Model will automatically ensure permissibility under the Turnaround Model as well.

Recommendation: In section I.A.2(d), insert at the appropriate place the following: "(__) Providing targeted interventions and support in feeder schools that are the primary pipeline for students enrolling in the SIG school.".

<u>Clarify the Permissibility of Upgrading Technology in SIG Schools.</u> A number of Great City School districts sought to upgrade technology in their SIG schools, but were prohibited from doing so by their SEA. Other districts did not have this problem. The Council recommends including technology in the "Permissible Activities" of the Transformational Model in order to ensure that districts have the option of integrating technology-based interventions.

Recommendation: In section I.A.2(d), insert at the appropriate place the following: "(__) Improving technology-based interventions and infrastructure in SIG schools.".

Allow the Consolidation of SIG Funds with Title I Allocations in School-wide Programs. Low-performing schools often have multiple school-level plans, when a single consolidated plan would be more productive. The Council recommends, at a minimum, allowing schools to consolidate their Title I School-wide Program plan and School Improvement Grant plan along with allowing them to consolidate these funding streams under the flexibility of school-wide programs (including the supplement-not-supplant compliance process). The requirements of both the school-wide program and the SIG provisions would be maintained under a single school-level plan. This consolidation of plans would help school staff focus on a primary set of objectives and activities, as well as potentially assist in the sustainability and coordination of efforts.

Recommendation: In section I.A.2(d), insert at the appropriate place the following: "(__) Consolidating Title I school-wide program plans and school-level allocations with SIG plans and SIG funding, including meeting the requirements of both school-wide programs and school improvement grants and complying with the supplement not supplant requirements under school-wide program procedures and authority.".

Remove the Mutual Consent Provision From the SIG Requirements. Federal SIG requirements should not override state and local law, school district personnel policies, and collective bargaining agreements. Even though the SIG provision on mutual consent for assignment by the teacher and the school is permissive, and not mandatory, the Council recommends its removal.

Recommendation: Strike section 1.A.2(d)(1)(B)(iii).

SIG Issues Needing Further Department Attention

Remedy the Obvious SIG Failure to Collect and Disseminate Useful Information to School Districts on the Outcomes of SIG-funded Strategies and Interventions. After some 15 years of School Improvement Grants and over \$10 billion in SIG funding under section 1003(a) and (g), there is surprisingly little information from the Education Department or SEAs on the efficacy of SIG projects. This is particularly true when it comes to identifying what strategies and interventions appear to work or not work. To its credit, the current Administration has conducted data analyses at the state level that appears to show the same levels of improvement as the Council's analysis shows. However, the variability in improvement strategies, interventions, and test data prevents a convincing delineation of what worked and what did not. The Council analysis found that SIG schools made more academic progress than similar schools, but the organization also found little difference between the main "reform models". Without being able to attribute positive outcomes to a particular reform model, the Council could only speculate about the reasons behind these outcomes. As a result, the Council

conducted case studies to differentiate what worked, what did not, and why. While the case studies were more nuanced than the broader data analysis, the case studies provide only a hint to why the results look like they do. Serious research on this needs to be conducted and only the federal government can launch such studies. Much more information on SIG approaches and their outcomes is needed. As a starting point, the Council recommends requiring a brief abstract to be submitted annually to the State from each LEA sub-grantee on the strategies, interventions, and results by school, which thereafter would be posted by the SEA. Other districts and schools could peruse the abstracts, and determine which districts they might want to contact for more information on their SIG program. The Council rarely recommends adding more federal requirements, but the dearth of useable information on SIG approaches and outcomes spanning three separate Administrations of both parties warrants improved research and dissemination effort.

Improving the Timeliness of States' Local SIG Application, Selection, and Funding Process. The timeliness of the SIG process of application, selection, and funding of local programs has complicated the implementation, staffing, and support at the local level in numerous states—and has undermined program effectiveness. The new authority for additional two-year SIG renewals and the prospect of lesser funding is likely to suffer from similar untimeliness, affecting continuity of effort and performance. The Council recommends that the Department engage in specific problem-solving activities with states to mitigate these timeliness issues.

Improve Local SIG Program Continuity Following Changes to State Accountability and Assessment Systems. Frequent changes in state accountability and assessment systems result in unexpected variations in SIG identification, exit, and performance criteria. The Council recommends that the Department engage in specific problem-solving with states and SIG-funded school districts to mitigate the disruptions resulting from these changes in state systems and requirements.

<u>Teacher Turnover in SIG Schools Remains a Significant Problem.</u> The ongoing problem of teacher turnover in SIG schools and the capacity to improve school-level performance with continuing staffing changes needs to be addressed as a national problem by the Department.

A Depleted Supply of Effective Principals Challenges Local Capacity to Replace Principals in Persistently Low-Performing Schools in Both Urban and Rural Settings. There is a limited supply of effective principals to lead turnaround school efforts under SIG and other similar state and local initiatives. Additional national and state attention should be devoted to developing short-term solutions to the supply of replacement principals.

The Council is encouraged by the generally positive results of the SIG efforts in recent years. Yet, we cannot overemphasize the importance of determining why some approaches have worked and why others have not. Since few districts have more than a handful of SIG schools and even less have more than a dozen, local school officials must learn not only the lessons from their own SIG experience, but also from other districts. Without greater emphasis on the "why and how" behind the outcomes, the SIG approaches in recent years may be no more impactful than the SIG approaches of the prior ten years. Moreover, the U.S. Department of Education needs to learn from the experiences of Great City Schools, and modify its SIG requirements and frameworks to expand the positive outcomes in upcoming grant cohorts. An important factor in improving and sustaining SIG outcomes is the active direction, involvement, coordination, and support of the LEA—something that is often missing.

The Council believes that the above comments will contribute to strengthening the SIG program. Please feel free to contact me at 202-393-2427 (mcasserly@cgcs.org) or Jeff Simering (jsimering@cgcs.org), if there are questions or concerns about our comments.

Sincerely,

Michael Casserly Executive Director

ESEA

Elementary and Secondary Education Act Statutory Requirements for LEA Waiver Request to the Secretary of Education

- 1) identify the Federal program(s) affected by the requested waiver;
- 2) describe which Federal statutory or regulatory requirements are to be waived and how the waiving of those requirements will
 - (i) increase the quality of instruction for students; and
 - (ii) improve the academic achievement of students;
- 3) describe, for each school year, specific, measurable educational goals [in accordance with Title I section 1111(b)] for the LEA or school(s) that would be affected by the waiver, and the methods to be used to measure annually the progress for meeting such goals and outcomes;
- 4) explain how the waiver will assist the affected local educational agency or school in reaching those goals;
- 5) describe how schools will continue to provide assistance to the same populations served by programs for which waivers are requested.
- 6) request review of the proposed waiver by the State educational agency and be accompanied by the comments, if any, of the State educational agency; and
- 7) provide notice and information regarding the waiver request to the public in the manner that the LEA customarily provides similar notices and information to the public.

DEPARTMENT OF EDUCATION PRIORITIES



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July 23, 2014

<u>Docket ID ED-2013-OII-0146</u> – Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs RIN: 1894—AA04

Margo Anderson U.S. Department of Education 400 Maryland Ave. SW, room 4W311 Washington D.C. 20202

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, submits the following comments on the Department of Education's Proposed Priorities and Definitions for discretionary grant program competitions issued in the Federal Register on June 24, 2014. The Council is commenting on selected priorities and certain definitions that may be used in addition to EDGAR criteria for awarding competitive education grants.

In general, the Council recommends streamlining and consolidating the proposed 15 priorities. The proposed 15 priority options and 56 sub-priorities, in conjunction with the 9 general EDGAR criteria and 96 sub-criteria under EDGAR, lack the focus and predictability that local school districts deserve while awaiting individual education competitive grant announcements. This labyrinth of competitive priorities, sub-priorities, criteria, and factors allows for wide swings in discretionary federal education priorities and creates needless uncertainty across the education community. Too many Department priorities make it appear that virtually everything and everyone is a priority, and tend to denigrate the impact of any particular priority.

The Council also notes minimal congressional motivation to provide competitive education funds in recent appropriations measures.

Comments on Proposed Priorities and Definitions Needing Revision

Omission of Urban Schools as a Priority, while Focusing on Rural Schools (proposed priority 4)

The Council objects to proposed priority 4 for "students in rural local educational agencies." Students in major urban school districts face serious challenges in their classrooms, schools, and neighborhoods that are every bit as profound as the needs in rural schools, if not more so. The impact of rural isolation in some – but not all – rural areas pales in comparison to the impact of crime, drugs, gangs, violence, severe health and mental health conditions, and concentrated poverty on the educational readiness and outcomes of students in central cities. The proposed priority appears to use "highneed" as an indirect reference to needs of urban schools and urban students. But if

the Department is determined to set a geographic priority on rural LEAs, then a direct reference to urban LEAs should receive equally explicit priority (i.e. rural and urban LEAs). In a more consistent approach, however, the Department might consider following its own "Final Priorities" from the December 15, 2010 Federal Register notice (FR Vol. 75, No. 121 at 78497)--

The intent of this priority is to focus on improving achievement and high school graduation rates and college enrollment rates of high-need students, in both urban and rural areas. We recognize that the title of the proposed priority may have incorrectly implied that this priority was exclusively focused on students in rural areas. Therefore, we are removing the reference to rural and high-need students from the title of the priority.

Urban schools have been pivotal in every major public school reform initiative in the nation, and the density of high-need students in these areas makes urban schools central to continuing national academic progress. Ignoring urban schools and urban students in the Administration's proposed priority list is shortsighted and unwarranted.

Recommendation:

In proposed priority 4 (a) and (b) strike "(ii) Students in rural local educational agencies (as defined in this notice)". [Alternative Recommendation: In proposed priority 4 under clause (ii) strike "rural" and insert "rural and urban" before "local educational agencies".]

Achievement Gaps of Racial and Ethnic Minority Students Are Not Directly Addressed in the High-Need Student Definition

The proposed definition of high-need students ignores the achievement gaps and the associated at-risk status of many racial and ethnic minority students in its list of examples of high-need students. In contrast, the Elementary and Secondary Education Act requires specific attention and disaggregation of performance information for major racial and ethnic minority groups. This omission is not cured by the general reference to students attending high-minority schools since these schools represent only a subset of the racial and ethnic achievement gap, and is unnecessarily dependent on State "equity" definitions. Additionally, the proposed high-need definition also omits any reference to new immigrant students with inadequate or interrupted educational backgrounds. Finally, the high-need student definition should be fixed in relation to Department priorities, and not subject to later variations as allowable under the "such as" regulatory language in the proposed definition.

Recommendations:

Revise the "high-need student" definition as follows: 1) strike ", such as students who are living in poverty," and insert "and who are living in poverty, who are from major racial and ethnic minority groups with persistent achievement gaps," and 2) insert "who are new immigrants to the United States with inadequate or interrupted educational backgrounds." after "homeless,".

Consolidating and Better Focusing Department Priorities

In order to better focus the Department's competitive grant priorities, the Council recommends narrowing and consolidating the proposed priorities. First, the Council recommends categorizing the Department priorities under three primary headings: Early Learning; Elementary and Secondary Education; and Postsecondary Education and Training with further prioritization under each category. Given the current challenges of implementing college and career-ready standards in the classroom, the top elementary and secondary education priority should be instructional strategies and approaches to operationalizing higher standards, improved assessments, and more rigorous instructional content.

Recommendations:

Under the Elementary and Secondary Education category -- 1) establish the first priority by revising proposed priority 8 under a revised heading of: "Implementing Internationally-Benchmarked College and Career-Ready Standards, Assessments, and Instructional Content" while including sub-priorities as necessary for Effective Teachers, Principals, and STEM derived from proposed priorities 7, 9, and 10; 2) establish the second priority analogous to proposed priority 4 "Improving Academic Outcomes for High-Need Students" including a Diversity factor from proposed priority 12 (note earlier comments on rural/urban and high-need definition); and 3) establish a final priority for "Non-Academic Factors Influencing Student Outcomes" by revising and consolidating proposed priorities 2, 13 and 14. (Note: the needs of military students and their families from proposed priority 15 could be addressed under the High-Need Students priority above.)

Under the Early Learning category, retain a priority analogous to proposed priority 1. Under the Postsecondary Education and Training category, consolidate proposed priorities 5 and 6 and focus the sub-priorities. And, delete proposed priorities 3 and 11.

Please direct any questions on the Council's comments to me or Jeff Simering at 202-393-2427. Thank you for your consideration.

Sincerely,

Michael Casserly Executive Director



PRESS RELEASES





FOR IMMEDIATE RELEASE October 15, 2014

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Chief State School Officers and Urban School Leaders Announce Joint Effort to Improve Student Testing

Washington, D.C. (October 15, 2014) – The leaders of state and large-city school districts today announced a joint effort to evaluate and improve the quality and quantity of student assessments in public schools across the nation.

Working together, the Council of Chief State School Officers and the Council of the Great City Schools jointly released *Commitments on High-Quality Assessments*, a series of established principles to guide state leaders and district leaders in making sure every assessment administered is high-quality, coherent, and meaningful to students, parents and teachers.

"Assessments are a critical part of public education because they help measure how every student is learning and making progress toward the goals we have set. Yet we as state leaders understand there is always room for improvement. As we transition to new assessments aligned with college- and career-ready standards in every state, this is a great opportunity for state leaders to take a look at all assessments and make sure they are of the highest quality and deliver meaningful results," said Council of Chief State School Officers Executive Director Chris Minnich.

"Tests are an important way for schools and parents to determine our students' academic needs, and gauge how well our children are progressing toward being college or career ready by the time they graduate," said Council of the Great City Schools Executive Director Michael Casserly. "But we hope through this process to create some additional rationality, coherence and purpose to how the nation assesses the learning of its children."





Minnich and Casserly made the announcement today, joined by New York State Commissioner John B. King, Jr., Louisiana State Superintendent John White, District of Columbia Public Schools Chancellor Kaya Henderson and Oakland (CA) Unified School District's School Board Member Jumoke Hinton Hodge.

"High quality assessments are an integral part of teaching and learning," New York State Education Commissioner John B. King, Jr. said. "They provide useful feedback to teachers, parents and students. In New York, we haven't increased the number of tests the state administers, and virtually all of the tests we give are required by federal law. Unfortunately, due to various pressures at the federal, state and local level, local testing has increased in many districts in New York, and this additional local testing does not always support good instruction and sometimes even crowds out time for student learning. Testing should be the minimum necessary to inform effective decision-making in classrooms, schools and districts. Earlier this year, New York asked for and received a waiver to eliminate double-testing for our accelerated 8th grade math students. We've introduced a grant program to help reduce non-essential local testing in hundreds of school districts across the state. More important, these grants will help teachers teach more and test less, which is exactly what our students need."

Jumoke Hinton Hodge, School Board Member with the Oakland (CA) Unified School District, said, "It is the responsibility of local, state, and federal entities to ensure that we are using academic assessments of student learning that are useful to teachers and will benefit students. We need more than cumbersome ranking systems and fill-in the bubble tests to improve achievement. What the Chief State School Officers and the Great City Schools are announcing today is an important first step in moving towards new standards and ensuring that our assessments measure up to the goals we are setting for the college and career readiness of our children. It is also an important occasion for revisiting questions of equity and opportunity in our schools and a chance to look afresh at whether these assessments further that goal or hinder it. I fully support this critical first step."

To learn more, download a <u>copy</u> of the Council of Chief State School Officers and the Council of the Great City Schools jointly released *Commitments on High-Quality Assessments*.

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The Council of Chief State School Officers (CCSSO) is a nonpartisan, nationwide, nonprofit organization of public officials who head departments of elementary and secondary education in the states, the District of Columbia, the Department of Defense Education Activity, and five U.S. extra-state jurisdictions. CCSSO provides leadership, advocacy, and technical assistance on major educational issues. The Council seeks member consensus on major educational issues and expresses their views to civic and professional organizations, federal agencies, Congress, and the public.

The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 67 large city school districts, its mission is to promote the cause of urban schools and to advocate for inner-city students through legislation, research and media relations.





Chief State School Officers, Urban School Leaders Offer Statements of Support for Commitments on High-Quality Assessments

More than 30 state and urban school leaders have offered strong statements of support for the Council of Chief State School Officers and the Council of the Great City Schools <u>Commitments on High-Quality Assessments</u>, a series of established principles to guide state leaders and district leaders in making sure every assessment administered is high-quality, coherent, and meaningful to students, parents and teachers.

- Statements of Support from Chief State School Officers
- Statements of Support from Large-City School District Leaders

Statements of Support from Chief State School Officers

California State Superintendent of Public Instruction Tom Torlakson:

"The right assessment, given in the right place at the right time, can provide valuable tools for students, parents, school officials and state policy makers as they strive for constant improvement of our education system. Once again, CCSSO has provided helpful groundwork for the conversations now taking place in states around the best way to the next generation of assessments."

Connecticut Commissioner of Education Stefan Pryor:

"Connecticut has embarked upon a multi-faceted effort to address the amount and the quality of testing in its public schools. In September, Governor Malloy and I asked Secretary Duncan to join Connecticut in exploring ways within federal law to reduce the number of high-stakes exams in Grade 11, given the currently overcrowded nature of the junior year in terms of testing. Last year, Connecticut partnered with the national education organization Achieve to pilot a tool to help superintendents take stock of their use of tests, and to identify areas where testing can be reduced. This year, the State Department of Education is providing competitive grants to help districts eliminate tests that are outdated, redundant, or do not contribute to student learning. We are grateful to CCSSO for the opportunity to dialogue with fellow states on the importance of administering a high-quality, transparent, coherent, and non-redundant assessment system to support student learning."

District of Columbia State Superintendent of Education Jesús Aguirre:

"The District of Columbia – like much of the rest of the nation – is undergoing a great deal of change: we have adopted new standards, we are implementing a brand new set of more challenging assessments, and we have established new ways of evaluating our schools, our teachers, and our school leaders. This is a critical time in our ongoing efforts to reform our schools and we remain committed to implementing meaningful and transparent assessments."





Georgia State School Superintendent Dr. John Barge:

"I fully support the Assessment Commitments document as it reflects my feelings about our testing program. I believe we are testing students too much and have overlapping and redundant assessments at the state and local level. I commend CCSSO and CGCS for developing this document and I look forward to working with policymakers and district superintendents in Georgia to ensure we have meaningful and high quality assessments."

Idaho Superintendent of Public Instruction Tom Luna:

"Everything we do in education must be focused on improving student achievement. The curriculum we use, the textbooks we adopt, and lesson plans that are taught must all provide learning opportunities to inform educators; assessments are no different. If an assessment doesn't lead to higher student achievement, then it doesn't serve an educational purpose and shouldn't be administered," said Superintendent Tom Luna. "We also need transparency as to what tests are given and at which levels: school, district, state, and national. Often, parents are concerned about over-testing, but aren't sure of the reasons. Six years ago, the State Board of Education went through a deliberate process to evaluate Idaho's assessments and ensure any state test was of high quality, provided accurate and timely data, and was part of a coherent system to improve student achievement. I believe the principles released by CCSSO will guide other states to do the same."

Illinois Superintendent of Education Dr. Chris Koch:

"Assessments have a multitude of purposes but, in general, are tools to help us to better understand individuals so as to intervene on their behalf. Teachers use assessments to gain a better understanding of students and behaviors associated with learning. Assessment data helps teachers gauge capacity to learn, guide teaching, check learning progress, identify learning difficulties, improve teaching techniques and assess teacher effectiveness. Administrators can use assessments in making decisions about overall educational planning, in determining an instructional program's strengths and weaknesses, in making decisions about grouping students for instruction, identifying where supervision is needed and in how well a school is achieving its objectives. Such information can help parents to better understand both the performance of their child and their school. Assessments build on the classroom experience and don't take away from it."

Iowa Department of Education Director Brad Buck:

"The principles and commitments on assessments issued today by the Council of Chief State School Officers and the Council of the Great City Schools offer a compelling approach to the responsible and effective use of assessments. In Iowa, we are using a thoughtful, inclusive process to redesign our state assessment system. We have a cross-section of stakeholders who understand our need for a high-quality assessment that is closely aligned with our state standards, reflects what is taught in classrooms, and moves us toward having students demonstrate high levels of knowledge necessary for success in college and career training. It's an exciting, pivotal time in our state's education system."





Kansas State Department of Education Interim Commissioner Brad Neuenswander:

"Kansas supports the need for high quality, meaningful assessments that are aligned to the college and career ready standards and that challenge students to demonstrate the depths of their knowledge. Assessments not only provide a critical piece of information that helps to inform instruction, they provide an opportunity for consistent benchmarking to ensure students are prepared for whichever path they choose to pursue after graduation."

Kentucky Commissioner of Education and CCSSO Board President Dr. Terry Holliday:

"High quality assessments can provide important information for teachers, students, parents and administrators. Even at the earliest grades, the right tests can indicate whether a student is on track for college/career-readiness and, if not, indicate what interventions may be necessary. In Kentucky, state testing, on average, takes less than one percent of instructional time each year. Still, we must strike a balance at the national, state, district, school and classroom levels between what is necessary and what is too much," he said. "I wholeheartedly support CCSSO's and the Council of the Great City Schools' efforts to promote the responsible use of high quality assessments to advance student learning."

Maryland State Superintendent Lillian M. Lowery:

"Maryland, like many states, is working with local school systems to implement fewer, better assessments, and limit the amount of time spent testing. We know that great teaching leads to real learning, and our teachers and school leaders make the best instructional decisions for their students. We must work together to utilize the best information available and efficiently meet the needs of every school and family."

Massachusetts Elementary and Secondary Education Commissioner Mitchell Chester:

"I am happy to see the Council of Chief State School Officers affirming that high-quality assessments are part of learning, and I'm also happy to see dialogue continue around how assessments are used. In Massachusetts, we have already begun to take a closer look at the variety of assessments used in classrooms and how they serve students."

Michigan Superintendent of Public Instruction Michael Flanagan:

"These principles for assessments represent best practices that Michigan can support. Transparency, accountability, and building strong partnerships among stakeholders will forge effective assessments to measure where our students need to be academically, and offer useful information for educators at every level."

Minnesota Education Commissioner Brenda Cassellius:

"It's well past time for a reasonable conversation about the use of assessments in good teaching and learning and how they can be used to ensure all kids are getting an equal opportunity for a great education. Good teaching – which means instruction that is aligned to high standards – includes assessing how well and how many students are meeting the standards. Good teaching is not test prep. Any assessments that are given to students, whether state, federal or local,





should satisfy two key questions: does this test help our teachers teach better and do they help our students learn better? If the answer to either is no, they should not be given."

Mississippi State Superintendent of Education Dr. Carey M. Wright:

"High-quality assessments go hand-in-hand with the implementation of higher academic standards. You cannot have one without the other. We are committed to administering new assessments that are aligned to our state's college- and career-ready standards. These assessments are critical to providing teachers and students with a meaningful measure of what students are learning in class. High-quality assessments also drive instructional practice by providing crucial information to educators and school leaders that inform decisions about instruction, resources, and policies."

Missouri Commissioner of Education Chris Nicastro:

"We believe every student can learn and every student deserves access to high quality schools. We check for that learning through high quality state assessments. These tests help us identify schools that need more support and create policies that encourage all children to succeed."

Nevada State Superintendent of Public Instruction Dale Erquiaga:

"The Nevada Department of Education is committed to ensuring our students and educators have assessments of the highest quality possible, aligned to the critical task of instruction. I am pleased to join my fellow Chief State School Officers in working to evaluate the assessment system, create a truly aligned system for Nevada, and increase transparency in all areas. Working together, we can ensure that Nevada students, parents, and educators have the necessary information to ensure success."

New Jersey Acting Commissioner of Education David Hespe:

"Measuring student progress is important in preparing our children for success in life, as we can better guide instruction and provide needed intervention. Assessments should be part of a coherent system, in which the assessments complement each other to provide information we need to improve student learning. Too often, students take tests that are designed to be used for a single purpose. Better assessments and more coordination among educators, from the classroom to the central office to the state education department, would allow students to take fewer formal assessments during the course of the year without sacrificing our ability to have crucial feedback about how students are learning."

New Mexico Secretary Hanna Skandera:

"We believe it is essential to administer assessments with student learning as the top priority. We continue to work hard to ensure assessments in New Mexico are a critical tool in the education process, not a hindrance. We have decreased testing time on average over the last four years, we are training our teachers on how to use data to drive instruction and we are partnering with districts to thoughtfully examine practices at the school level to ensure our assessments are delivering critical information to educators and parents."





New York State Education Commissioner John B. King, Jr.:

"High quality assessments are an integral part of teaching and learning. They provide useful feedback to teachers, parents and students. In New York, we haven't increased the number of tests the state administers, and virtually all of the tests we give are required by federal law. Unfortunately, due to various pressures at the federal, state and local level, local testing has increased in many districts in New York, and this additional local testing does not always support good instruction and sometimes even crowds out time for student learning. Testing should be the minimum necessary to inform effective decision-making in classrooms, schools and districts. Earlier this year, New York asked for and received a waiver to eliminate double-testing for our accelerated 8th grade math students. We've introduced a grant program to help reduce non-essential local testing in hundreds of school districts across the state. More important, these grants will help teachers teach more and test less, which is exactly what our students need."

North Carolina Superintendent of Public Instruction Dr. June Atkinson:

"Student assessments are an important way for us to be sure that students are learning appropriately and that we are good stewards of public resources. As North Carolina's State Superintendent, I support this unified effort by state education leaders to provide and support assessment systems that are clear, coordinated and designed to help teaching and student learning. Parents and students should be able to see what is expected of students from kindergarten through graduation and how assessments play a role in learning and advancement."

Oklahoma State Superintendent of Public Instruction Dr. Janet Barresi:

"Assessments are a critical tool in our efforts to strengthen education and bolster academic achievement. By letting us know what students are learning and where challenges lie, assessments are vital to making certain our schools are held accountable to parents, students and communities. Evaluating the success of a school or district requires sound metrics, and that is where assessments play an important part."

Oregon Deputy Superintendent of Public Instruction Rob Saxton:

"It's important for educators to have the right tools in their toolbox, and one of those tools is access to appropriate types of assessments. We must ensure the assessments are of high-quality and provide the important feedback loops to improve instruction, programs, and ultimately improve student outcomes and learning."

Rhode Island Commissioner of Elementary and Secondary Education Deborah A. Gist:

"As educators, none of us wants to test students too much, and each of us wants assessments that help us make good decisions about instruction. Through an initiative we call The Assessment Project, the Rhode Island Department of Education and Rhode Island School Superintendents' Association have joined forces to develop guidance on improving state and local assessment decisions and practices. Together, we want to ensure that Rhode Island schools





use high-quality assessments that provide excellent information to support individual students in a way that improves, but does not disrupt, instruction."

Tennessee Commissioner of Education Kevin Huffman:

"We need high-quality annual assessments to understand how each individual child and each group of children are progressing. Tennessee provides transparent information to parents about which standardized assessments used in each district. We must continue our work to ensure that the assessments themselves are high quality and measure the right skills."

Virginia Superintendent of Public Instruction Dr. Steven Staples:

"Quality assessments play a critical role in improving outcomes for students by measuring individual progress and identifying under-performing schools in need of support and intervention. The Commitments to High Quality Assessments announced today — which I am pleased to endorse — mirror efforts already underway in Virginia to introduce more innovative assessments and to identify duplicative testing practices that can get in the way of good instruction."

Washington State Superintendent of Public Instruction Randy Dorn:

"I appreciate that the Council of Chief State School Officers and the Council of the Great City Schools have put together this thoughtful commitments document. Every day we strive to make sure the assessments are high-quality and efficient. By high-quality, I mean that the results are reliable: They can be used to help students – and educators – improve. By efficient, I mean that we don't overtest. We use only those assessments that best indicate student performance. The commitments document is a great reminder to us all about both the benefits and responsibilities of assessments."

Statements of Support from Large-City School District Leaders

Charlotte-Mecklenburg Schools Superintendent Heath Morrison:

"In Charlotte-Mecklenburg Schools, we support assessment for learning, assessments which provide timely, actionable data. Using timely, high quality summative and formative assessments, teachers can intervene at the time of need and stretch all learners toward meeting college- and career-ready standards. The High-Quality Summative Assessment Principles published by the Council of Chief State School Officers is a start in outlining changes that need to be made by policymakers. As a member of the Council of Great City Schools, we support efforts to reduce unnecessary testing."

Cleveland Metropolitan School District Chief Executive Officer Eric Gordon:

"As testing has become increasingly important in the understanding of how our students grow and in the assessment of our teachers' and other educators' performance, it is more important than ever to ensure that these assessments are of the highest quality and appropriate rigor. The combined efforts of the CCSSO and CGCS outlined today will help us to study and leverage the highest power of these important assessments in the least intrusive manner."





Houston Independent School District Superintendent Terry Grier:

"Making sure that our assessments of student progress are accurate, transparent, and cohesive is one of the most important things that public school educators could be doing right now. This announcement by the Great City Schools and the Chief State School Officers is something I strongly support."

Kansas City (Missouri) School Board Member Airick Leonard West:

"Raising the rigor of standards without raising the quality of assessment would be counterproductive. As a member of the state-wide taskforces responsible for revising Missouri's K-12 standards, I strongly welcome this effort on the part of CCSSO and CGCS."

Long Beach Unified School District Board of Education Vice President Felton Williams:

"The Long Beach Unified School District strongly supports the CCSSO and CGCS commitments on high-quality assessments. Our school system is nationally and internationally recognized for its effective use of data to drive instruction and professional development. We have earned such recognition in part because we have long believed in creating and administering high-quality assessments that are meaningful and part of a coherent system. A school district's continuous improvement efforts are heavily dependent on high-quality data. To obtain high-quality data, we must first have high-quality assessments."

Los Angeles Unified School District Superintendent John Deasy:

"I could not be in stronger support of this joint effort by the country's premier state and city educational organizations to take a hard look at how our nation assesses the academic attainment of its children. For too long, we have piled one assessment on top of another without a clear game plan for what we were doing and why. This collaboration has the promise of bringing some badly needed rationality to this very public and important debate."

Oakland (CA) Unified School District School Board Member and Chair of the Council of the Great City Schools Jumoke Hinton Hodge:

"It is the responsibility of local, state, and federal entities to ensure that we are using academic assessments of student learning that are useful to teachers and will benefit students. We need more than cumbersome ranking systems and fill-in the bubble tests to improve achievement. What the Chief State School Officers and the Great City Schools are announcing today is an important first step in moving towards new standards and ensuring that our assessments measure up to the goals we are setting for the college and career readiness of our children. It is also an important occasion for revisiting questions of equity and opportunity in our schools and a chance to look afresh at whether these assessments further that goal or hinder it. I fully support this critical first step."





San Francisco Unified School District Superintendent Richard Carranza:

"Educators across the nation recognize the need for high quality, CCSS-aligned assessments in order to ensure the highest quality teaching and student learning. In urban school systems, this need is particularly important in ensuring equity for all students - not only for those that need additional support, but also for those students that benefit from additional acceleration in their learning. The promise of these assessments is tantamount to the tools necessary to continue to build America's great public schools. I support this effort by cities and states to ensure that these assessments are high quality and do not duplicate each other."

Toledo Board of Education President Cecelia M. Adams:

"Toledo Public Schools has been moving full steam ahead and taking actions for nearly three years that fully support the statement of Commitments from CCSSO and CGCS on High Quality Assessments. We have been earnestly preparing for the full implementation of PARCC and updating our technology for it and other online assessments. We plan to stay the course and greatly appreciate the leadership of CCSSO and CGCS in staying on the frontline for high quality standards and assessments".

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FOR RELEASE August 29, 2014 CONTACT: Henry Duvall (202) 393-2427 or hduvall@cgcs.org

Ohio's Proposed Repeal of the Common Core Would Cost Taxpayers Billions of Dollars, Says a Council of the Great City Schools Analysis

WASHINGTON, DC, Aug.29 – A recent review by the Council of the Great City Schools' of the cost implications for Ohio House Bill 597, which proposes to move away from Common Core State Standards, is estimated to cost Ohio taxpayers more than \$2.4 billion dollars.

The Bill proposes to transition from the Common Core State Standards adopted by Ohio in 2010 and replace the standards with the old Massachusetts standards for a two-year period while new Ohio standards are developed.

Ohio teachers and educators have spent the past four years implementing the Common Core curriculum. The professional development costs to change the standards in Ohio would extend more than eight years. In addition to the estimated \$1.2 billion already invested in Common Core training since 2010, future costs would potentially include training staff on the interim Massachusetts standards (two years) and the cost of training teachers and staff on the new Ohio standards (two years minimum).

Given what has already been spent on the Common Core and the future costs of implementing two new sets of standards, taxpayers stand to invest nearly \$3 billion in teacher training on standards. The total cost estimate is based on studies¹ that have reported teacher professional development expenditures that range between \$2,970 and \$10,100 per teacher per year. In the calculations, the lowest estimates of professional development costs per teacher were used for each of Ohio's approximately 100,156 full-time teachers. The total annual cost of professional development for the state is estimated at approximately \$300 million.

The cost estimates do not include training costs for other district administrators and staff (i.e., principals, central office administrators, etc.) or estimates for developing the new standards and materials teachers and schools will need. The Bill is currently being considered in the House Rules and Reference Committee.

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¹ Odden, A., Archibald, S., Fermanich, M., & Gallagher, A. (2002). A cost framework for professional development. Journal of Education Finance, 28(1), 51-74. Retrieved from http://www.jstor.org/stable/40704157



News...News...

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FOR RELEASE August 25, 2014 CONTACT: Henry Duvall (202) 393-2427 or hduvall@cgcs.org

Urban School Experts Develop New Resource for Helping English Language Learners Achieve

WASHINGTON, Aug. 25 -- Thousands of educators in large urban school districts across the nation now have access to a free resource, designed to guide districts in accelerating achievement for English Language Learners (ELLs).

Developed by a team of ELL experts and contributors from member districts of the Council of the Great City Schools (CGCS), the resource, entitled <u>A Framework for Raising Expectations and Instructional Rigor for English Language Learners</u>, addresses challenges faced by educators who are implementing new college- and career-ready standards with their bilingual, immigrant, and refugee students who are acquiring English.

Designed as a practical guide for districts with large populations of English learners and created with the support of the Bill & Melinda Gates Foundation, the document introduces a new pedagogical framework for English language development that explicitly addresses the higher language demands of new college- and career-ready standards. In recognition of the variety of programs found in districts, the framework also addresses the range of models and contexts in which instruction for ELLs is delivered, and provides a set of considerations for choosing effective instructional materials to accelerate achievement for ELLs.

"This is one of those ground-breaking tools that local school districts will be using to reform and strengthen their instructional programs for English Language Learners and to enhance the quality of the classroom materials that teachers use to boost academic attainment for this growing population in our Great Cities and nationwide," says Council Executive Director Michael Casserly. "This document is one more piece of evidence of how our urban school leaders are sharing their expertise to ensure success for all our students."

A second, parallel project is currently underway to spur the improvement of instructional materials for ELLs. Funded by the Gates Foundation and Televisa Foundation, this project brings together publishers of instructional materials, ELL experts, and instructional leaders from CGCS member districts with large ELL enrollments. Together, they are working to shape the evolution of instructional materials to reflect the more rigorous expectations embedded in the new standards.

Participating publishers include Amplify, Benchmark Education, Houghton Mifflin Harcourt, and National Geographic Learning/Cengage, all of whom have committed to participating in a series of in-depth meetings and conversations around materials development, piloting new materials in classrooms in the spring of 2015, and integrating feedback into their development cycle.





Council of the Great City Schools

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EMBARGOED FOR RELEASE

July 21, 2014 (12:30 p.m., Eastern)

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Urban Schools Announce Unprecedented Commitment to Improve Achievement of Young Men of Color

Great City Schools Back White House My Brother's Keeper Initiative

WASHINGTON, July 21 – Leaders of 60 of the largest urban school systems in the country have joined in a first-ever collective commitment to improve educational outcomes for boys and young men of color by implementing a set of evidence-based strategies that range from early childhood to graduation, the Council of the Great City Schools announced today at a White House event with President Obama. Collectively, the school systems educate a third or more of America's African American and Latino students and nearly forty percent of low-income boys and young men of color.

In a call to action by the Council of the Great City Schools, the primary coalition of the nation's urban schools, each of the school systems support boosting efforts to prepare males of color for college and careers, to reduce the disproportionate number who drop out of school or who are suspended, and to help them succeed.

With such a large portion of the country's school-age African American males and Hispanic males enrolled in big-city public schools, urban-school leaders agree that they have an obligation to teach all students to the highest academic standards and prepare them for today's global society.

"Our job as urban educators is not to reflect or perpetuate the inequities that too many of our males of color face; our job is to eliminate those inequities—and that is what we pledge to do," stressed Council Executive Director Michael Casserly. "We are pleased to join forces today with the White House, the U.S. Department of Education, and our other partners in an unprecedented shared commitment to improve the educational and social opportunities of our young men of color," he added.

In "A Pledge by America's Great City Schools," each of the 60 urban school systems committed to carrying out 11 specific actions, which include:

- Ensuring that pre-school efforts better serve males of color and their academic and social development;
- Adopting and implementing elementary and middle school efforts to increase "the pipeline" of
 males of color who are on track to succeed in high school, and increasing the numbers
 participating in advanced placement, honors, and gifted and talented programs;
- Keeping data and establishing protocols to monitor the progress of males of color and intervene at the earliest warning signs of problems;

- Reducing the disproportionate number of males of color who are absent, suspended, expelled, or placed inappropriately in special education classes; and
- Working to transform high schools with low graduation rates among males of color and striving to increase the numbers of males of color and others who complete the FAFSA forms for college aid.

The Council is also announcing a partnership with the College Board to work jointly to increase the numbers of males of color participating and succeeding in Advanced Placement (AP) classes in our urban public schools.

In late 2010, the Council of the Great City Schools sounded an alarm with the release of an eyeopening report indicating that young black males in America are in a state of crisis.

The widely publicized report – A Call for Change: The Social and Educational Factors Contributing to the Outcomes of Black Males in Urban Schools – led to Council testimony before the U.S. Senate Subcommittee on Children and Families, and prompted the organization to release a companion analysis of Hispanic students.

The *Call for Change* study called for a White House initiative, noting that the education, social, and employment outcomes of African American males are equivalent to a "national catastrophe" requiring coordinated national attention.

Since the release of the reports, the Council established internal and external advisory committees to guide the urban school coalition on its work with males of color. It commissioned a series of papers by the nation's leading authorities to propose strategies for improving urban school efforts on behalf of African American males. And in August 2012, the authors of the papers converged at a summit with the U.S. Department of Education and the White House to discuss strategies to improve outcomes for African American males.

The work of the authors has culminated in the development of a Council e-book titled *A Call for Change: Providing Solutions for Black Male Achievement*, which is available at no cost through Amazon and other outlets.

Other Council activities to improve the outcomes of males of color include:

- A national town hall meeting late last year on race, language, and culture, moderated by noted Harvard law professor Charles Ogletree, taped and televised on PBS
- A study titled *Today's Promise, Tomorrow's Future: The Social and Educational Factors Contributing to the Outcomes of Hispanics in Urban Schools*, as well as reports on English language learners; and
- Student and urban school-district surveys to gauge the challenges and possible interventions needed to improve the outcomes of males of color.



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FOR IMMEDIATE RELEASE June 5, 2014

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Council of the Great City Schools Names 2014 Math and Science Scholars
Urban students receive scholarships from ExxonMobil and Dr. Bernard Harris

WASHINGTON, DC (Business Wire) — Four graduating high school seniors have been named recipients of the 2014 ExxonMobil Bernard Harris Math and Science Scholarship by the <u>Council of the Great City Schools</u> (CGCS), selected from several hundred applicants nationwide for their academic performance, leadership qualities and community involvement.

The scholarship program was created by former astronaut <u>Dr. Bernard Harris Jr.</u>, the first African American to walk in space, and <u>ExxonMobil</u> to help underrepresented students pursue science, technology, engineering and math (STEM) studies and to increase diversity in the STEM workforce.

The awards are given annually to African-American and Hispanic seniors from high schools in the 67 urban school districts represented by CGCS.

"These scholarships create a launching pad for talented students to pursue postsecondary studies and careers in the challenging STEM fields," said Michael Casserly, executive director, Council of the Great City Schools. "With the generous support of ExxonMobil and Dr. Harris, these young men and women have an opportunity to reach the stars and become innovators and leaders of tomorrow."

Each scholar will receive \$5,000 for continued education in a STEM-related field. This year's award winners are:

- Deandra Chetram, Charles W. Flanagan High School, Pembroke Pines, FL, Broward County Public Schools;
- Bridgette LaFaye, Woodrow Wilson High School, Washington, DC, District of Columbia Public Schools;
- Leonardo Sanchez-Noya, John A. Ferguson Senior High School, Miami, FL, Miami-Dade County Public Schools; and,
- Ezra Zerihun, The Early College at Guilford, Greensboro, NC, Guilford County Public Schools.

In the fall, Ms. Chetram will attend the University of Florida to study biology. Ms. LaFaye is going to the University of Illinois at Urbana-Champaign to pursue a career in materials science and engineering. Mr. Sanchez-Noya will study biomedical engineering at Yale University, and Mr. Zerihun plans to major in computer science at North Carolina State University.

"Our country is driven by our ability to create and develop the most advanced technologies and solutions," said Dr. Harris. "Engineers and scientists are the catalysts, and by providing these scholarships, we are planting seeds in minds of these bright young students, especially those from diverse backgrounds, to support their interest in the exciting and rewarding careers in STEM."

Administration of the scholarship program, including the application process, pre-selection and presentation of awards, is provided by the CGCS. Dr. Harris participates in the final selection of the recipients.

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About The Council of the Great City Schools

The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 67 large city school districts, its mission is to promote the cause of urban schools and to advocate for inner-city students through legislation, research and media relations. The organization also provides a network for school districts sharing common problems to exchange information, and to collectively address new challenges as they emerge in order to deliver the best possible education for urban youth. www.cgcs.org

About ExxonMobil

Exxon Mobil Corporation, the largest publicly traded international oil and gas company, uses technology and innovation to help meet the world's growing energy needs. ExxonMobil engages in a range of philanthropic activities that advance education, with a focus on math and science in the U.S., promote women as catalysts for development, and combat malaria. In 2013, together with its employees and retirees, ExxonMobil, its divisions and affiliates, and the ExxonMobil Foundation provided \$269 million in contributions worldwide, of which \$100 million was directed toward education. Additional information on ExxonMobil's community partnerships and contribution programs is available at www.exxonmobil.com/community.

About The Harris Foundation

Founded in 1998, The Harris Foundation is a 501 (c) (3), non-profit organization based in Houston, Texas, whose overall mission is to invest in community-based initiatives to support education, health and wealth. The foundation supports programs that empower individuals, in particular minorities and economically and/or socially disadvantaged, to recognize their potential and pursue their dreams.

The Education Mission of The Harris Foundation is to enable youth to develop and achieve their full potential through the support of social, recreational, and educational programs. The Harris Foundation believes that students can be prepared now for the careers of the future through a structured education program and the use of positive role models. More than 15,000 students annually participate and benefit from THF programs. www.theharrisfoundation.org

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The Washington Post

School standardized testing is under growing attack, leaders pledge changes

By Lyndsey Layton October 15 at 8:38 PM

The standardized test, a hallmark of the accountability movement that has defined U.S. public education since 2002, is under growing attack from critics who say students from pre-kindergarten to 12th grade are taking too many exams.

Four states have repealed or delayed graduation testing requirements in the past two years. Four others, including Texas — where the idea of using tests to hold schools accountable for educating children first began — have cut the number of required exams or reduced their consequences. Boycotts, such as when 60,000 students refused to take exams this year in New York, are on the upswing.

Former president Bill Clinton said two weeks ago that students don't need to be tested annually, as required by federal law. "I think doing one [test] in elementary school, one in the end of middle school and one before the end of high school is quite enough if you do it right," he said.

On Wednesday, a group representing top education officials in every state and the leaders of major urban school districts acknowledged the pushback and promised to evaluate the tests they give and to ditch those that are of poor quality or redundant.

"Testing is an important part of education, and of life," said Michael Casserly, executive director of the Council of Great City Schools, which represents 67 urban school systems. "But it's time that we step back and see if the tail is wagging the dog."

The urban school leaders were joined in their effort by the Council of Chief State School Officers, which represents education commissioners in every state.

Education Secretary Arne Duncan, who said in August that testing was "sucking the oxygen out of the room" and promised to do something about it, applauded the education leaders. President Obama on Wednesday praised the efforts of the education leaders and said his administration would help school districts promote "the smarter use of tests that measure real student learning."

Robert Schaeffer of the nonprofit National Center for Fair & Open Testing said the move was too timid.

"It's baby steps," he said. "We've had 12 years of this high-stakes testing, and the evidence on the ground is that it's not working. And the public is getting angrier and angrier."

Teachers have always administered tests. But exams became a federal mandate in 2002 under the No Child Left Behind Act, which required states to annually test every student in reading and math in grades 3 through 8 and once in high school. States also must give three separate science tests. The data must be reported publicly and broken down by subcategories such as race, income, English language status and disability.

The data revealed jarring differences in student achievement between poor and affluent students and among black, Hispanic and white students — variations hidden when schools did not test every child, or when they reported average school test scores.

No Child Left Behind also ushered in the practice of using test scores to evaluate schools and punish them for meeting student performance goals set by the federal government. Since 2011, the Obama administration has exempted most states from the most draconian aspects of the law but, in exchange, states must use test scores in part to evaluate teachers and decide which ones to keep, reward or fire. Some critics say that has increased the pressure that comes with the testing.

That requirement has become particularly thorny this year as most states migrate to new, more challenging standardized tests aligned with the Common Core State Standards. Both major teachers unions have been pushing for a moratorium on the use of test scores for employment decisions, an idea endorsed by the Gates Foundation.

"The tide on testing is turning," said Randi Weingarten, president of the American Federation of Teachers. "But this effort addresses the symptoms, not the root cause, of test fixation. . . . It doesn't touch No Child Left Behind's highly consequential testing for every child, every year."

In addition to the federally required tests, states have layered on more assessments, with many requiring exams such as an exit test to graduate high school. Local school districts and individual schools often administer more tests.

The result is that, on average, students in large urban school districts take 113 standardized tests between pre-K and 12th grade, according to data being collected by the Council of Great City Schools.

Students in 11th grade are tested the most, with as many as 27 days, or 15 percent of the school year, in one district. Students in eighth grade spend an average of five days taking annual exams required by federal law, as well as other state and local tests.

The council has embarked on the first comprehensive analysis of the testing that exists in major urban systems and will make recommendations about ways to lighten the testing burden, Casserly said.

Two bills in the House would get rid of the federal requirement to test annually and instead instruct states to assess students once during a span of several years.

Sen. Lamar Alexander (Tenn.), a former education secretary and the ranking Republican on the Senate Health, Education, Labor and Pensions Committee, said through a

spokeswoman that he would consider eliminating some annual testing when Congress rewrites No Child Left Behind.

But John White, Louisiana's superintendent of education and a member of the Council of Chief State School Officers, said annual testing is a civil rights necessity.

"We should always be conscious we still have a country and a society that is rife with injustices," White said. "We must commit to an annual measurement of our delivery of an education so we can lay bare the honest truth as to whether we're succeeding in educating every child."

Education Week

State and District Leaders Vow to Reduce Testing, Stick With Yearly Assessments

By Liana Heitin on October 15, 2014 1:00 PM

UPDATED

State school chiefs and leaders from big-city districts committed to reviewing the array of assessments students take in schools and eliminating redundant tests, but they also made clear that they will not back away from annual standardized testing.

At a conference call this afternoon, representatives from the Council of Chief State School Officers and the Council of the Great City Schools acknowledged widespread concerns about the frequency and quality of tests being administered in public schools, and said they will take steps to ensure the tests used are in students' best interests.

[UPDATE (3:00 p.m.): During that call, Michael Casserly, the executive director of the council, noted that his group has been collecting data about national, state, and local tests being administered in schools. A preliminary analysis has shown that students in urban districts take "an average of 113 standardized tests between prekindergarten and 12th grade," he said. Eleventh graders spend the most time taking tests—up to as many as 27 days of testing per year—and 5th graders sit for an average of five days of testing per year. "Testing is administered for 23 distinct purposes," Casserly said, including federal and state accountability, English-language proficiency, diagnostics, and evaluations of programs.]

While the push for less testing is not new, it does appear to be gaining momentum—and not just among parents and educators, but also in Washington. As my colleague Alyson Klein wrote earlier this week, members of Congress have introduced bills to reduce the amount of federally mandated testing, and the U.S. Department of Education is hearing out a proposal from New Hampshire to pilot a modified testing schedule. After years of staying the course, the U.S. Secretary of Education himself recently said that "testing—and test preparation—takes up too much time."

Featured on the phone call were New York State Commissioner John King, Louisiana State Superintendent John White, and District of Columbia Public Schools Chancellor Kaya Henderson—all young, energetic school leaders who have been strong supporters of the common core and teacher-accountability efforts.

"These are leaders of the next generation stepping up to say testing is still important, we hear your concerns, but we're not going to back down," said Andy Smarick, a partner at Bellwether Education Partners, a Washington-based consulting group.

'Responsible' Assessments

In a **document put out with the announcement**, the CCSSO and the council wrote that they would work together to ensure "assessments are used in responsible ways." They also affirmed their commitment to yearly testing, writing that "without assessments given at least once a year, educational leaders would not have the information they need to know about who is learning and who is not."

The state schools chiefs vowed in that document to publish a list of all state assessments, help get rid of duplicative assessments, and "partner with school districts to review their benchmark and formative assessments." The urban district leaders said they would review the assessments administered in their districts for alignment and quality, eliminate inappropriate assessments, "curtail counterproductive 'test prep' practices," and make the results of their reviews public.

[UPDATE: White, the Louisiana schools chief, said on the call, "We've seen that most of the testing taking place on a daily basis is not on the state level but in the everyday work in schools. We need to take a hard look at the industry that sells these products." While the shift to the common standards has caused more scrutiny of curricular materials, he said, periodic and formative assessments have been "less examined."

Local testing, much of which is "nonessential," has increased in recent years, according to King, the New York state superintendent. "We believe we can work together with our districts to make sure the testing we have in our states at the state and local level is the minimum necessary to inform our decision making," he said.]

The organizations' joint effort is "definitely clearing the way for a streamlined, meaningful assessment system," said Daria Hall, the director of K-12 policy development for the Washington-based Education Trust, a nonprofit advocacy group. "I don't want to say PARCC and Smarter Balanced and other college- and career-readiness tests are going to be the only thing states should do—it may be that there are other benchmark or interim assessments teachers find meaningful and we shouldn't rob them of that—but we do need to go through and make sure there's a clear purpose for every assessment that is being administered."

Last year, the American Federation of Teachers released a **report looking at two districts' testing programs**, which found that tests and test-preparation are a financial burden and take up weeks of instructional time. Teach Plus, a nonprofit that trains teachers to be policy advocates, **released a report earlier this year** finding wide variations in the amount of time districts spend on testing. (The authors eventually **conceded major errors** in the data.)

In a statement about today's announcement by the CCSSO and the council, AFT President Randi Weingarten said, "It's great that they see the need to limit test redundancies, improve test quality, curtail test preparation, and focus assessments on informing instruction. ...But this effort addresses the symptoms, not the root cause, of test fixation. Unless I'm missing something, it doesn't touch No Child Left Behind's highly consequential testing for every child, every year. Even the Gates Foundation went further by calling for a two-year moratorium on high-stakes consequences for tests aligned to the Common Core State Standards." The Bill & Melinda Gates Foundation wrote in a June 10 letter that districts should hold off on tying teacher evaluations to common-core-aligned assessments for two years, but did not recommend delaying administration of the tests.

The announcement by the CCSSO and the council also preceded a discussion at the Center for American Progress titled, "The Need for Better, Fairer, Fewer Tests," scheduled for tomorrow in Washington..

The Council of the Great City Schools will also be discussing its full study on assessment practices in big-city districts at its annual conference next week.

Education Week

Urban Districts Develop Common-Core Guide for Teaching ELLs

Material-selection guidelines included

By Lesli A. Maxwell September 9, 2014

What should instruction for a new learner of English look like in a common-core English/language arts classroom?

And how can educators judge whether the instructional materials they use will both challenge and support English-learners to meet the more sophisticated language demands of the Common Core State Standards?

Some of the nation's biggest school districts have banded together to answer those questions and provide guidance to the teachers moving headlong into teaching the standards to a diverse array of learners who face new, and tougher, common-core-aligned tests this school year.

The Council of the Great City Schools, a Washington-based organization of 67 big-city districts, recently finished work on <u>an instructional guide</u>, or "<u>framework</u>," for educators grappling with how to infuse language learning at all proficiency levels with their teaching of rigorous English/language arts standards, such as reading complex texts and crafting arguments from evidence.

"We have to be clear about what kind of instruction we expect for ELLs," said Gabriela Uro, the director of English-language-learner policy and research at the council and the leader of the project. "The driving goal of this framework is getting our ELLs full access to the common-core standards and ensuring that is what drives their language development."

The framework also provides a detailed set of criteria, or "ELL considerations" for district leaders to use as they evaluate textbooks, supplemental books, and digital learning materials for use with their English-learners. The new resource was developed jointly by ELL experts and representatives from some member districts.

Collectively, the council's member districts educate more than a quarter—about 1.2 million—of the English-learners in U.S. public schools.

Injecting Rigor

The project arose, in large measure, because of widespread dissatisfaction among big-city educators over the quality of instructional materials published for ELLs. That dissatisfaction was captured in a survey of 44 council districts last year, in which 82 percent of the principals, teachers, and central-office administrators who responded said their current materials for English-learners were either "somewhat" or "not at all" reflective of the rigor in the common standards.

"What is typically presented as materials for ELLs is watered down, simplified, and so stripped of context that it removes the challenge and rigor, as well as the grade-level expectations," said Teresa Walter, the director of special projects for the 132,000-student San Diego district, who worked on devising the framework with colleagues from other council districts. "If we give them easy materials, how can we expect them to reach these higher expectations?"

To help <u>guide districts as they make purchasing decisions</u>, the council's framework builds on criteria for judging the quality of common-core-aligned English/language arts materials that were developed by Student Achievement Partners, a nonprofit organization in New York City that played a leading role in writing the common standards.

The "ELL considerations" developed by the council include big-picture judgments, such as whether publishers drew on the expertise of researchers in their design phase, and if experts on second-language acquisition were involved in writing the materials. Districts should also find out if English-learners were part of a publisher's piloting of the materials. The next layer involves numerous "non-negotiable" criteria meant to ensure the materials provide rigor in language development, grade-level content, and guidance to teachers on how to integrate supports for English-learners based on their proficiency levels.

Dozens of other considerations are spelled out in the framework, including the importance of judging whether materials are both culturally relevant and respectful of English-learners' native language, ethnicity, race, and immigration experience.

Whether publishers can, or would, respond to the full range of considerations is not clear, Ms. Uro said. But the council is pursuing a related endeavor with a small number of publishers to craft new instructional materials for English-learners that are common-core-aligned and respond to the criteria in the framework. Over the next year, those publishers will work on writing pilot units for ELLs that will be tested in some member districts, Ms. Uro said. The effort is being supported by the Bill & Melinda Gates Foundation and the Televisa Foundation. Gates also provided development support for the instructional framework. (The Gates Foundation also helps support coverage of college- and career-ready standards in *Education Week*.)

Closer Look

On the instruction side, the framework presents two main components.

One is "focused language study," which calls for schools to dedicate time in each day to work with ELLs on English-language acquisition across the four domains of reading, writing, listening, and speaking, and especially the more formal, academic language needed for students to engage with content across all subjects. That would take place in already-established English-as-a-second-language services that can occur in stand-alone classes or as part of an English/language arts class.

The other component is "discipline-specific and academic-language expansion" that calls for all teachers to develop and expand the academic English of ELLs as they teach content in all subject areas.

"This is the tougher piece because it involves content teachers who don't think they should have to teach literacy," Ms. Uro said. "But having this document that lays it out for them should help those conversations about everyone's responsibility for the language-learning and language-expansion of ELLs."

The framework clearly acknowledges the different approaches districts use in providing services to their English-learners and provides two examples of how the guide to both instruction and selecting materials can be used.

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CCSS expand English language development opportunities

By Adam Dolge

The language demands spread throughout the Common Core State Standards will provide a substantial challenge for ELLs as they work to attain language proficiency, but experts say those demands may also provide greater opportunities for ELLs to acquire language across multiple content areas.

The shift to the Common Core requires all educators, not just ESL and ELL teachers, to support ELLs' language development. As schools and districts continue building and reworking language development systems for ELLs, they should be aware of the instructional shifts in the Common Core and recognize the new, higher expectations for ELLs.

Gabriela Uro, manager for English Language Learner Policy and Research for the Council of the Great City Schools, said during a meeting of the National Council of State Title III Directors this summer that the Common Core also comes with a shift in expectations for ELLs.

She said during webinars or other meetings, it's common to hear people say ELLs simply can't perform at the high level of the Common Core, that the text will be too complex, or that ELLs don't know English well enough to attain the rigorous academic content.

"Those are expectations our field needs to change," Uro told the state Title III directors. Whether it's practitioners, the central office, or the SEA, "our field needs to make that shift and send a different message."

This shift in expectations and practice is important as nearly every school serves ELLs. Uro said some 74 percent of schools enroll at least one ELL, and in some states that statistic is much higher. In California, for example, some 94 percent of the schools in the state serve at least one ELL.

"Our districts can only succeed if our ELLs succeed," Uro said.

ELD 2.0

Uro described a change in how language development is provided in schools, especially those with more rigorous content standards, as the next level of English language development, or ELD 2.0. The vision, she said, is to accelerate ELLs' language development and access to grade-level, rigorous instruction in all content areas.

ELD 2.0 is predicated on shared responsibility, Uro said, so that the success of ELLs is not rested solely on the shoulders of ELL teachers. Everyone must say they are responsible for the success of ELLs, she said, and recognize that language is not only developed in ELL classes, but also in all content classes.

Educators need to understand that ELLs are capable of learning at high levels. Teachers must be supported from their school, district, and state offices. Educators also need joint planning time across teacher teams to effectively drive an understanding of ELLs' language and academic needs in the Common Core.

Leaders must also understand the important language shifts required for ELLs to engage in talk, complex thinking, and complex grade-level texts.

ELD 2.0 has two essential components:

- 1. Focused language study time groups ELLs together to concentrate on specific English-language elements already known by their native English-speaking peers. Students should be grouped by English proficiency levels and should not be isolated in a single-level group. Instruction may be provided in either push-in or pull-out settings and from ESL teachers, or by classroom teachers, or co-teachers, working as a small group with similar language levels.
- 2. Discipline-specific and academic language expansion is ongoing and integrated into content areas, which ELLs and their native English-speaking peers study throughout the school day. Discipline-specific language expansion may also be provided by content area teacher or co-teachers with ESL teachers planning and teaching together.



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Migrant Wave Tests Schools

Cost, Integration Challenges Emerge Amid Surge of Central American Children

By

Arian Campo-Flores And Miriam Jordan

Aug. 14, 2014

Public schools around the country are returning from summer break to face a challenge: integrating and paying for the influx of migrant children who have streamed across the Mexican border this year.

The children, mostly from Central America, are those who have been released to sponsors—usually parents or relatives—while they await immigration proceedings that could take years to complete. As a result, they are settling in communities throughout the U.S., from large metropolitan areas to small cities.

The numbers are substantial. More than 37,000 children who crossed the border unaccompanied by parents were placed with sponsors between Jan. 1 and July 31, according to the U.S. Department of Health and Human Services. The states that received the most children were Texas, with 5,280; New York, 4,244; and California, 3,909.

Because the children generally lack English skills, have often received limited schooling and may have suffered emotional trauma, they present schools with a host of needs that could strain resources.

With the new academic year already under way or soon to start, education officials around the country mostly have struck a welcoming tone. "We have both a legal and moral obligation to teach these kids," said Alberto Carvalho, superintendent of Miami-Dade County Public Schools.

Many public schools, which must enroll children regardless of immigration status, already have seen enrollment spikes of these recently arrived youngsters.

While schools are accustomed to absorbing migrant children, this wave presents some distinct challenges. Many children from Central America have witnessed murder and some have been victims of abuse and rape, which has left them with psychological scars.

"We have some really traumatic stories," said Patricia Chiancone, an outreach counselor at Maryland's Prince George's County Public Schools, where new enrollment by children believed to be unaccompanied migrants jumped to 175 last school year from 65 two years earlier. She cited one

case of a high-school-age brother and sister who fled Central America on their own after their mother and younger sister were killed by a gang.

In addition, many of the children have gone long stretches without schooling. At Dalton Public Schools in Georgia, where Central American minors began trickling in last school year, "there were 16-year-olds who really had not been in school since first or second grade," said Caroline Woodason, assistant director for student support for the district.

Such students often require a variety of services, including subsidized meals, English-language instruction, tutoring and psychological counseling, said Mr. Carvalho, of the Miami-Dade district. He said his district enrolled 300 new Central American children in the final quarter of the last school year and is preparing for hundreds more this fall.

While some districts say they can handle the new arrivals with existing resources, others are concerned about a potential financial hit. "I don't think we can handle it without hiring additional personnel," said James Meza Jr., superintendent of Louisiana's Jefferson Parish Public School System, which has a sizeable Honduran population.

In Miami-Dade, the additional services will cost the district an estimated \$2,000 more per pupil, Mr. Carvalho said. As a result, the county school board passed a resolution in June to request additional federal funding. The request is pending.

The Council of the Great City Schools, a Washington, D.C.-based organization that represents urban school districts around the country, has been pressing the Obama administration and Congress for additional funding. "We're trying, but so far, without much luck," said executive director Michael Casserly.

Education Secretary Arne Duncan recently told reporters that the administration is "trying to figure out how we can be flexible and responsive to superintendents so they can better serve these children when they're hitting school."

Still, districts anticipating new enrollees are preparing in numerous ways. The Dalton school system created a Newcomer Academy that will aim to transition the youngsters into a mainstream school within six months to a year.

The Internationals Network for Public Schools, a group of 19 public high schools in New York, California and the Washington, D.C., area that specialize in educating immigrant children, is developing networks of legal and social-service providers to respond to the particular needs of unaccompanied minors.

The Miami-Dade district has a plan similar to previous ones directed at waves of immigrant children. Among its provisions are the creation of reception centers to process students and conduct academic and health assessments.

The true impact of the current wave of unaccompanied youth on school systems won't become clear until classes are well under way. But "make no mistake," Mr. Carvalho said, "they will arrive."

Education Week

Published in Print: August 27, 2014,

Latest Waiver Move Could Weaken Key Obama Priority

Move loosens strings on teacher evaluation

By Lauren Camera

Washington

The **decision by U.S. Secretary of Education Arne Duncan** to let states operating under No Child Left Behind Act waivers delay tying student test scores to teacher evaluations potentially uproots one of the administration's biggest education policy priorities.

Giving states incentives to adopt new teacher-evaluation systems that take into account, among other things, student test scores, is at the center of both the waiver offering and Race to the Top, the administration's signature competitive-grant program.

But at the Jefferson Academy Middle School here this week, Mr. Duncan told a group of about 100 teachers and principals that he had fielded repeated complaints from the education community that teachers shouldn't be held accountable for student test scores while states are also performing the difficult task of transitioning to new assessments aligned to the Common Core State Standards.

"This can cause some real anxiety and trepidation [among teachers]," said Mr. Duncan.
"Not worrying that that's a part of their evaluation this year makes some common sense, and if states want to talk to us about that, we're open for business."

As a result, he said, states can now request a delay in the deadline for using student test results in teacher evaluations. While Mr. Duncan said he expects most states to propose a one-year postponement, pushing the deadline to the 2015-16 school year, he did not close the door to states asking for more than that. Either way, Mr. Duncan and the Obama administration will remain in office for only a few months after any such delay. And that doesn't give the policy time to take hold before a new administration—which could reverse the waiver initiative entirely—takes over.

"Whether these evaluation systems are fully implemented and really take root in states won't be up to Secretary Duncan," said Anne Hyslop, recently an education policy analyst for the New America Foundation, a nonpartisan thank-tank in Washington, who now works at Bellwether Education Partners. "Another administration could come in and change course. If you think about the original vision of the waiver policy, ... that's not going to happen by the end of this administration in most places."

Making It Official

Though Mr. Duncan's Aug. 21 announcement makes the added flexibility official, this is something the department has been building up to for a few months.

In May, Deborah Delisle, the assistant secretary for elementary and secondary education, acknowledged in a letter to chief state school officers that some states need to alter their proposed evaluation systems and timelines. Since then, the department has been collecting feedback from states about what additional flexibility and support it could provide while still holding states accountable for the commitments they made to get waivers from provisions of the NCLB law.

In June, the District of Columbia school system became the first waiver recipient to decide that **it wasn't going to use a "value added" test-score-based algorithm** for measuring teacher effectiveness for the 2014-15 school year as it makes its transition to new tests aligned with the common core. The U.S. Department of Education didn't cheer the move, but also didn't say that the delay put the district's waiver in jeopardy.

After that, the department began granting waiver extensions to states that have the authority to implement teacher-evaluation systems that meet the federal parameters, but need to make changes in a few "targeted areas," including timelines.

Despite being warned by the department in June that **it could lose nearly \$300 million of its Race to the Top funds** if it followed through on a proposal to delay incorporating test scores from common-core-aligned exams in its teacher-evaluation system, New York secured a waiver extension. The department also said the Empire State is on track for consideration of a longer waiver-renewal period come spring of 2015.

South Carolina and Delaware, which are still hammering out changes to their evaluation systems, **continued the trend.**

This week's official announcement is also part of a larger effort by the administration to work more closely with teachers.

"No teacher, no school, no district should ever be defined by a single test score," Mr. Duncan said. "I don't think anybody is actually doing that, but I want to be clear that we know there's so much that tests don't measure."

Leaving the Door Open

Mr. Duncan seemed to leave the door open for states hoping to score additional wiggle room from other parts of their waiver commitments.

"We will work with states seeking other areas of flexibility as well," he wrote in a department blog post explaining his teacher-evaluation decision.

The American Federation of Teachers did not overlook that phrasing, and its president, Randi Weingarten, made a pitch to also do away with the annual testing requirement.

"We shouldn't be testing every child, every year," she said in a statement after cheering the administration's latest flexibility decision. "We need assessments that meaningfully measure student learning. And we need a new accountability system that moves from a test-and-punish model to a support-and-improve model."

In general, education stakeholders applauded Mr. Duncan's decision.

"Allowing for more time and flexibility to ensure fair educator evaluations based on the new student assessments shows a willingness to listen and learn from parents, teachers, and students," said Carmel Martin, the executive vice president for policy at the Center for American Progress. Ms. Martin previously served in the Education Department as the assistant secretary for planning, evaluation, and policy development, and helped craft the administration's education agenda, including its stance on teacher evaluation.

Michael Casserly, the executive director of the Council of the Great City Schools, agreed.

"States and big-city school districts are working hard to implement significant changes in standards, assessments, and evaluations that are taking place nationwide, and additional time to implement those changes and reforms effectively is welcome," he said **in a statement.**

Politico

Moms winning the Common Core war

By: Stephanie Simon July 29, 2014

The millions have proved no match for the moms.

Supporters of the Common Core academic standards have spent big this past year to persuade wavering state legislators to stick with the new guidelines for math and language arts instruction. Given the firestorm of opposition that took them by surprise, they consider it a victory that just five states, so far, have taken steps to back out.

But in a series of strategy sessions in recent months, top promoters of the standards have concluded they're losing the broader public debate — and need to devise better PR.

Consider: Conservative commentators Glenn Beck and Michelle Malkin held a crackling town hall meeting last week describing the Common Core as a threat to local control of education. The two-hour event was simulcast in 700 movie theaters nationwide and will be rebroadcast Tuesday night in more than 500.

About 10,000 aspiring activists have since downloaded Beck's "action plan" for defeating the standards. Beck's slogan, "We will not conform," is still echoing on Twitter. FreedomWorks, the tea party group that co-sponsored the event, is planning Skype chats to hash out tactics with local activists inspired by the evening.

The response from Common Core backers?

A pair of sedate videos featuring three former Republican governors — one of whom has been out of office for 11 years — sitting in front of a gray backdrop, eyes fixed on a point slightly off camera as they cycled through familiar talking points. And a news release offering quotes from standards supporters, including a fifth-grade teacher in rural Colorado and a Pentecostal preacher from Virginia.

Neither seemed likely to set social media ablaze.

So, backed with fresh funding from philanthropic supporters, including a \$10.3 million grant awarded in May from the Bill & Melinda Gates Foundation, supporters are gearing up for a major reboot of the Common Core campaign.

"We've been fighting emotion with talking points, and it doesn't work," said Mike Petrilli, executive vice president of the Fordham Institute, a leading supporter of the standards. "There's got to be a way to get more emotional with our arguments if we want to win this thing. That means we have a lot more work to do."

Step one: Get Americans angry about the current state of public education.

To that end, expect to start hearing from frustrated college students who ended up in remedial classes even though they passed all their state tests and earned good grades in high school. "These kids should be as mad as hell" that the system failed them, Petrilli said.

Expect poignant testimonials, too, from business owners who have tried to hire kids from the local high school only to find they can't do tasks involving basic math, such as separating out two-thirds of a pile of lumber.

Step two: Get voters excited about the prospects of change. Teachers who like the standards are going to be sharing more concrete examples of benefits they see in their classrooms. Groups representing minority students will likely be more vocal, too. The National Council of La Raza, for instance, is promoting a new video featuring a little girl who credits the standards with teaching her the word "whimsical."

And there will be a whole lot more from the pro-Common Core side on social media, including Pinterest pages full of student work. A coming Twitter blitz will aim to stir up buzz for a new video that tracks a debate between four people who at first seem to want very different things from their schools — but end up discovering they all support the standards. The video, produced by an Arizona coalition, doesn't once mention the well-worn talking points "academic rigor" or "international benchmarks."

"The Common Core message so far has been a head message. We've done a good job talking about facts and figures. But we need to move 18 inches south and start talking about a heart message," said Wes Farno, executive director of the Higher State Standards Partnership, a coalition supported by the U.S. Chamber of Commerce and the Business Roundtable.

The looming PR blitz doesn't worry Common Core opponents.

"The phrase we use a lot down here in our messaging is 'putting lipstick on a pig," said Karen Effrem, co-founder of the Florida Stop Common Core Coalition. "You can't make something that's so bad look good."

Some Common Core backers are also dubious.

"There wasn't a good job of messaging this early on, and I'm not sure those deficits can be addressed," said Daniel Lautzenheiser, an education analyst at the American Enterprise Institute. Even a fresh approach, he said, might not be enough to "stem the tide of opposition."

The mommy platoons

Standards supporters say they're at a huge disadvantage in the PR fight because anytime a child brings home a confusing worksheet, gets a bad grade or stresses out about a test, parents can—and do—blame it on the Common Core. (An anonymous wag satirized that phenomenon with the launch last week of a Twitter feed that blames all the ills of the world on the standards. As in: "The car in front of me didn't use a blinker. #ThanksCommonCore.")

Teachers who like the Common Core say it's revolutionized their classrooms, prodding students to read texts more closely and think more analytically. But it's hard to convey that in a tweet. Really good sixth-grade essay questions rarely go viral. A nonsensical math problem might, whether or not it truly has anything to do with the Common Core.

Analysts say the opposition also has an edge because it's tapped into a populist anger that animates both left and right. The self-proclaimed "mommy platoons" organized to take down the standards portray them as an inferior product forced on unsuspecting communities by a cabal of big business and big government elites. Every time supporters come out with sophisticated new promotional material, it only feeds their anger at the big money backing the Common Core, including about \$200 million from the Gates Foundation.

Many of the opponents' claims are misleading or outright false. But their passion leaves an indelible impression.

And until now, Common Core backers have tried to fight it with sober testimony at statehouse hearings and earnest op-eds in the local paper. With a few notable exceptions — like a peppy animated video produced by the Council of the Great City Schools — messaging in support of the standards has been fairly stilted, backers acknowledge with chagrin.

"We joke about it sometimes," said Richard McKeon, education program director for the Helmsley Charitable Trust, which has directed \$3 million in the past few months to bolster communications. The opposition, he says, stirs up waves of populist fury — and supporters "respond with a fact sheet."

Common Core supporters acknowledge they also erred in publicly belittling opponents as silly, ignorant or outright kooky. "We make a great mistake by caricaturing the opponents of the standards as crazies or people who don't tell the truth," David Coleman, an architect of the standards, told Bloomberg EDU recently.

Another misstep: Much of the Common Core outreach to date has been aimed narrowly at politicians, not parents.

Indeed, some of the talking points crafted to win over Republican lawmakers seemed likely to backfire with moms and dads, such as when Billy Canary, president of the Business Council of Alabama, referred to children as "the product created by our education system" and said businesses need schools to start turning out better product.

The lobbying effort has kept 40 states and D.C. committed to the standards, but the Common Core remains a volatile issue in states including Louisiana, Wisconsin and Ohio. More repeal votes are expected in the coming year.

Meanwhile, national polling released in the spring by Achieve Inc., which helped write the standards, found voters more skeptical of the Common Core than they were two years ago. A Pew Research Center report last month found solid opposition among all Republicans, not just

tea party members, while support from liberals was fairly anemic, at around 55 percent. And a recent Siena College poll of likely voters in New York state found 49 percent want to drop the standards and only 39 percent want to keep them.

"The bottom line here is that parents need more information, and maybe we haven't been good enough at telling them the story," said Karen Nussle, a veteran PR strategist who runs the Collaborative for Student Success

Ditching the data points

The collaborative is working on the new outreach campaign, drawing on a \$14 million annual budget from a number of philanthropies, led by the Gates Foundation.

Other groups are pitching in, too.

The U.S. Chamber of Commerce Foundation is working on an animated website that will pay homage to the playful spirit of children and link the Common Core to that kind of creativity. Vice President Cheryl Oldham boasts that there won't be a single data point on the site; it's designed to prompt a visceral, not an intellectual, response.

"We're so good at all our statistics and data and rational arguments ... [but] emotion is what gets people feeling passionate," Oldham said. "It may not be the most comfortable place for the business community ... [but] we need to get better at doing it."

The pro-Common Core side lacks the star power of the opposition, which has been boosted not just by Beck and Malkin but by comedians like Stephen Colbert and Louis C.K. Former NBA star Isiah Thomas wrote an op-ed supporting the standards, and foundations set up by the actress Eva Longoria and singer John Legend helped fund a pro-Common Core TV ad that ran on Fox News this spring, but none of the three has taken on a highly visible role.

Instead, the new campaign will rely heavily on ordinary people seen as trusted messengers in their local community — teachers, pastors, small-business owners.

"There's a whole group of people out there who are reasonable and want to talk about a good education for their children. Those are the people we want to reach," said Carissa Miller, deputy executive director of the Council of Chief State School Officers, which helped write the standards

Common Core opponents are also updating their PR playbook.

They're using their social media savvy to disrupt pro-standards outreach. A recent Twitter town hall sponsored by the Learning First Alliance was continually interrupted by the digital equivalent of hecklers who used the chat's hashtag, #CCSStime, to post photos of confusing Common Core homework and challenge the motivation of those supporting the standards.

Activists are also pushing one another to tone down the wild-eyed rhetoric that has repeatedly cropped up on some websites. They warn newcomers to the cause that even a few outlandish claims make it easy for Common Core backers to dismiss the entire opposition as conspiracy theorists in tinfoil hats.

"The Common Core is so bad, you don't have to lie," said Erin Tuttle, co-founder of Hoosiers Against Common Core. "If you can't prove what you're saying, if you can't back it up with a document or a source, you shouldn't put it out there."

In that vein, strategists at the Glenn Beck event told activists to refrain from describing the standards as a communist plot and to steer clear of phrases that might turn off liberals, like comparing the standards to Obamacare. (Not all took the call for moderation to heart: A tweet using Beck's #wewillnotconform hashtag called Common Core "a page from hitler playbook.")

Beck's action plan also urges members of his grass-roots army to actually read the standards they're critiquing. And it recommends calm, concise presentations.

"You can be angry or effective," said Brian Glicklich, a crisis communications expert who spoke at the event, "but you can rarely be both at the same time.

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Fox News

Parental revolt against Common Core prompts states to take action

By Ruth Ravve

Published April 07, 2014 FoxNews.com Facebook1313 Twitter431 Gplus32

Erin Tuttle moved Leo to the private school when her home state of Indiana, along with 45 other states, agreed to follow the Common Core State Standards Initiative for all its public schools and those following the charter school program, such as the Catholic school. The Common Core standards are a set of guidelines for schools, initiated federally, to improve and make consistent education standards in math and English language arts.

The goal of Common Core is to "... articulate what students need to know in grades K-12 in order to be ready for college or a career after they graduate," said Mike Casserly, executive director of the Council of Great City Schools, which supports and promotes the standards.

Many students and teachers saw the standards for the first time this year, as the program was being phased in nationwide. And now that they've seen it, many are not happy with it, and they're joining an ever-increasing group of critics who are lining up against it.

Teachers complain the program was pushed through too fast, that there wasn't time for schools to make the adjustment, there wasn't additional funding available for new textbooks, and that they just weren't included in the process when the Common Core was created.

"You forgot some of the most important people in this whole process, and that was the educator," said Teresa Meredith, president of the Indiana Teacher's Association. "The one person who could really help make or break this was the educator, and you didn't include the educator from the very beginning in terms of building an implementation plan," she said.

In addition, a growing number of parents nationwide, including Erin Tuttle, are joining forces to eliminate the Common Core, which they claim "dumbs down" their children's education by using inferior methods compared to teaching techniques used in the past.

Conservatives call it an extreme abuse of federal overreach, one that limits the control states and local communities have on their education programs.

Indiana is the first state to pull away from the Common Core. Oklahoma lawmakers have passed a bill repealing that state's participation in Common Core, and there are now some 300 bills in state legislatures nationwide that deal with Common Core in various ways. Some would slow down, reduce, or eliminate

altogether implementation of the Common Core", according to the National Conference of State Legislators.

That would be a major blow to the program, which was strongly touted by the Obama administration as a way for children in the United States to be globally competitive.

"Education is an important component to the economic well-being of any nation," Casserly explains. "When the United States started to look at these international comparisons and saw that we were beginning to slip behind other countries -- like Korea and Belgium and Singapore and Malaysia and other entities... the United States really needed to raise its academic performance," he said.

Michigan's Gov. Rick Snyder agreed. "Isn't it important that we're globally competitive?" he asked. "We were lagging, we were getting behind. And what the Common Core does, presents a set of standards that will help us get back to that globally competitive place we need to be."

While education levels in many parts of the country need improvement, critics concede, a one-size-fits-all approach to education is not the solution.

"Settling for a status quo of mediocrity for every state certainly shouldn't be the answer," said Tuttle. "We should be striving for something much higher than that, something that is internationally competitive, something that will allow our children to be competitive in a global economy." But, Tuttle adds, "the Common Core simply won't do that."

Common Core supporters claim all the criticism is based on misinformation, that it's not federal overreach because the program is voluntary. Indiana was able to back out without any penalty. The standards are more of a concept.

"The Common Core State standards are not a curriculum, they're not a textbook, they're not a set of lesson plans," said Casserly. And they weren't created in a vacuum, he said. While the standards were being created "some 10,000 comments" were submitted by parents and educators.

Now that Indiana has backed away from Common Core, Erin Tuttle may move her son back to his old school. But first she wants to see how far her state will stray from the federal standards, and whether it will go back to what she claims were the higher standards the state followed before Common Core.

"People across the country will be watching to see what Indiana does next," she said.

Cleveland Plain Dealer

New Common Core tests may overwhelm some students, seriously challenge others, the Council of the Great City Schools predicts

By Patrick O'Donnell, The Plain Dealer

on April 17, 2014 at 7:35 AM, updated April 17, 2014 at 7:49 AM

CLEVELAND, Ohio -- The new **Common Core** tests coming to Ohio next year will force students to answer questions in ways they have never faced before on state tests.

And the results won't be pretty, a recent study by the **Council of Great City Schools** suggests, unless students start learning a few skills the tests will demand.

"A lot of people don't understand how fundamentally different the work is that these standards require," said **Michael Casserly**, executive director of the organization representing the country's largest urban districts. "It appears that a lot of our kids are not adequately prepared for the kinds of complex problem-solving response that they're being asked for."

Eric Gordon, chief executive officer of the **Cleveland school district**, heard the findings at a Council meeting late last month. He came back with a message for his school board and one that could apply to every school grappling with the Common Core: "We will have do to a great deal in changing how we think about instruction in the classroom."

Casserly and his staff predicted the new tests will pose several challenges for suburban and urban districts alike, but he and Gordon highlighted two patterns: Students not knowing how to solve problems involving multiple steps, and students not knowing how to **cite evidence from readings to support answers.**

"Kids were used to just filling in a bubble based on recalling something," Casserly said. "There are too many instances where kids taking state assessments were relying on their ability to recall a fact or formula or algorithm to fill in a bubble."

Both Common Core testing partnerships, **Smarter Balanced Assessment Consortium** and the **Partnership for Assessment of Readiness for College and Careers (PARCC)**, the coalition that Ohio belongs to, **are doing trial runs with students now**, before starting for real next year.

Those trial exams are offering an early look at how students will handle new types of questions, and even highly-rated suburban schools report students are experiencing new challenges with them.

Casserly and his staff looked to another test, the **National Assessment of Education Progress** (NAEP), for additional hints on how students will fare. NAEP bills itself as the **nation's report card** and measures all states to a common standard.

The Council found questions on NAEP that mirror ones on Common Core exams and looked at how students did, along with offering some examples of the kind of written answers the Common Core tests will likely require.

NAEP, given every two years to a sampling of fourth- and eighth-graders across the country, generally sets higher standards for students than state tests. It leads many to predict that the new Common

Core tests will produce similar results to those on NAEP, which will mean large decreases in the percentage of students rated as proficient.

"Students statewide are going to perform less well on these assessments," Gordon told his school board.

For fourth- and eighth-grade reading and math, NAEP found only 35 to 42 percent of students nationwide to be proficient. In Ohio, 39 to 48 percent of students were proficient, depending on grade and subject.

Since NAEP only samples students, instead of testing everyone, it doesn't have results for individual districts. But Cleveland volunteered for **extra sampling.**

Cleveland performed worse than almost any other district in the nation on the 2013 NAEP.

The Council's study found that students struggled with NAEP questions that force them to work through multiple steps and to give answers at each step, as tests will require from both Common Core testing groups.

One such question on NAEP asked students to find the shortest distance back to their tent from a point in a campground, by measuring a series of paths with a ruler. It asked which direction was longer and also how much longer, so the second question built off the answer to the first.

"Failure to understand A well, will make it impossible to answer B," Gordon said.

Nationwide, only 32 percent of fourth-graders answered the questions right and only 23 percent in the urban districts. In Cleveland, only 15 percent of students answered the questions correctly.

Students also struggle, the Council found, with questions that make them write out observations of graphs or literary passages. And they had poor results with questions that asked them to explain reasoning, another common requirement in both PARCC and Smarter Balanced Common Core tests.

In addition to giving answers that were incorrect, students often gave no answer at all. That's a big change from the multiple-choice questions used today, where kids can simply guess.

"They may be frustrated enough by a question to not even try it," Casserly said. "We need to do a better job of working with kids on how to apply their knowledge, solve problems and express their knowledge to somebody else."

Casserly pointed to questions, in both math and English, that require students to explain their answers. As the presentation from the Council noted:

"In addition to the large percentage of students across the country who do not answer these items correctly (82 percent nationally in the first example), one should note the percentage of students who make no attempt to answer these types of items."

The Council showed an eighth-grade NAEP math question designed to see if students can understand how to run an experiment. Correct answers would show that students understand the need for a control group.

It read: "Liz is conducting an experiment to see whether students learn vocabulary words by a new method faster than they learn them by the old method. Fifty students will participate in the experiment. She pairs off the 50 students so that the two students in each pair have similar levels of vocabulary. One student in each pair then learns words by the old method. The other student in the

pair learns words by the new method. Why did Liz pair off her 50 students instead of just having all 50 of them use the new method?"

In Cleveland, only eight of 101 students sampled answered the question correctly, with 12 giving no answer at all. In the separate statewide Ohio sample, only 15 answered the question correctly, with four giving no answer at all.

The Council also showed several English questions from NAEP in which students had to read an essay or a factual description and answer questions. Both Common Core testing groups will require students to cite passages from the text that support their answers.

Gordon told the board that students are used to describing how they feel about things they read for state tests and explaining how issues in the text relate to them, but not with making observations and having to quote passages to back them up. Students will have to learn to change the way they answer.

"It's now going to be 'This is why I know,' instead of 'I like this piece for these reasons," Gordon said.

The Council showed results from a NAEP question that followed an essay that described differences in cultures.

"Provide an example from the story that shows that Miguel does not feel part of Dominican culture," the question asked.

Only 33 percent of fourth-graders nationally answered this question correctly, with some not citing any examples and instead saying things like all cultures are unique and everyone should be happy about where they came from.

Only 18 of 99 students sampled in Cleveland answered this question acceptably, with 14 skipping it entirely. Results from all of Ohio were not included.

Casserly said the NAEP examples are not perfect comparisons to the upcoming Common Core tests, but should help guide districts in how to prepare students.

"It's an illustration of how the new standards are being applied, and also suggests what kids are going to be asked to do and how it differs from what they've been asked in the past," he said. "The goal here wasn't to try to get an early prediction. The object here was to figure out what kind of instruction we were going to need to try to meet the standards."

New York Times

Obama to Report Widening of Initiative for Black and Latino Boys

My Brother's Keeper Program Grows to Include More Impoverished Minorities

By MOTOKO RICH

July 20, 2014

<u>President Obama</u> will announce on Monday that 60 of the nation's largest school districts are joining his initiative to improve the educational futures of young African-American and Hispanic boys, beginning in preschool and extending through high school graduation.

The districts, which represent about 40 percent of all African-American and Hispanic boys living below the poverty line, have committed to expand quality preschool access; track data on black and Hispanic boys so educators can intervene as soon as signs of struggle emerge; increase the number of boys of color who take gifted, honors or Advanced Placement courses and exams; work to reduce the number of minority boys who are suspended or expelled; and increase graduation rates among African-American and Hispanic boys.

President Obama announced in February a five-year, \$200 million initiative, known as My Brother's Keeper, to help black and Latino youths.

No new federal spending is attached to the initiative. The new efforts, which will also seek support from the nonprofit and private sectors, are being coordinated by the Council of the Great City Schools, which represents large urban school districts. Michael Casserly, executive director of the organization, said that while a handful of districts had already made some progress in helping black and Latino boys improve their academic performance, "we need to move these numbers and improve these futures as a collective if the nation as a whole is to make any progress on this front. It's not enough for us to do well in a small number of cities."

"The 50-year anniversary of the 1964 Civil Rights Act reminded us that those great battles of the past were not fought over access to mediocrity," Mr. Casserly added. "They were fought over access to excellence."

Black and Latino students have long experienced a pattern of inequality along racial lines in American schools. According to data from the Department of Education's Office of Civil Rights, black and Latino students are suspended and expelled at much higher rates than white students and attend schools with less-experienced teachers. Many also attend schools that do not offer advanced math and science courses.

Boys in particular are at a disadvantage. Black and Latino boys are less likely to graduate from high school than white boys, but also less likely than African-American or Latino girls. And in elementary school, they already fall far behind their white counterparts in reading skills: According to the National Assessment of Educational Progress, a series of standardized tests administered to a random sampling of American children, only 14 percent of black boys and 18 percent of Hispanic boys scored proficient or above on the fourth-grade reading tests in 2013, compared with 42 percent of white boys and 21 percent of both black and Hispanic girls.

The My Brother's Keeper initiative will also address the needs of Asian-American and Native American boys.

John E. Deasy, superintendent of the Los Angeles Unified School District, said he was eager to share some successful tactics with other school systems. In Los Angeles, he said the district reduced its annual suspensions from 50,000 in the 2009-2010 school year to 8,000 this past school year, in part because of a new policy eliminating "willful defiance" as a reason for suspension. He said he regarded efforts to improve academic and social outcomes for young black and Latino men as "a deep moral commitment issue."

The president will also announce on Monday that various organizations have committed funds to develop mentoring programs for young black and Latino youths or to design new school models for disadvantaged communities.

These include the National Basketball Association, AT&T and the Emerson Collective — founded by Laurene Powell Jobs, widow of Apple's founder Steve Jobs — to make grants and investments in education initiatives. The College Board, which administers the SAT and <u>Advanced Placement exams</u>, is also announcing a partnership with the Council of the Great City Schools to increase the number of black and Latino boys who show promise on Preliminary SAT exams to take A.P. courses.

Education Week

Big-City Districts Join Obama's Initiative to Support Black and Latino Boys

By Lesli A. Maxwell on July 21, 2014 9:40 AM

UPDATED:

Sixty of the nation's big-city school districts have signed on to President Barack Obama's effort to improve educational outcomes for boys of color—a \$200 million initiative known as **My Brother's Keeper**.

The president will be joined by dozens of district leaders, mayors, athletes, and business leaders as he <u>announces the expansion of the initiative</u> on Monday at a school in Washington. He first announced the \$200 million effort in February.

Districts that are part of the Washington-based Council of the Great City Schools are joining the initiative, which aims to improve outcomes for black and Latino boys through investing more in early-childhood education, driving down disproportionately high school discipline rates for boys of color, providing mentoring programs, and increasing such boys' access to rigorous college-preparatory courses.

Several nonprofit and private organizations, including the National Basketball Association, will be kicking in support for the effort, according to the White House. The Emerson Collective, founded by Laurene Powell Jobs, will provide \$50 million toward launching a competition to design new high schools that effectively serve disadvantaged youths. The College Board is creating a \$1.5 million "All In" program to ensure that more boys of color enroll in at least one Advanced Placement course.

On nearly every measure of educational success, black and Latino boys lag behind their white and Asian peers. Though graduation rates have steadily improved for boys of color over the past decade, they continue to trail far behind.

Some districts, such as California's Oakland Unified, have already been <u>aggressively</u> <u>working to improve outcomes for boys of color</u>. Oakland a few years ago created an office of African-American male achievement with the explicit mission of "stopping the epidemic failure of African-American male students in OUSD."

Concerned about the intractable achievement gaps between between black and Hispanic boys and their white peers, President Obama first announced My Brother's Keeper in February. Since then, some women and girls of color have criticized the effort for ignoring the challenges they face in and out of school and have argued that it should be expanded to include their gender.

The 60 districts said they are agreeing to pursue several specific actions to support male students of color, including:

- Making early-education programs more amenable to their academic and social needs;
- Collecting data and establishing practices to monitor their progress and intervene when warning signs appear;
- Changing policies and practices to drive down their absences, suspensions, expulsions, and inappropriate special education placements; and
- Targeting efforts in elementary and middle school grades to boost their participation in honors, Advanced Placement, and gifted and talented programs.

At today's event, 54 of the 60 urban districts were represented by superintendents, school board members, or other high-level administrators, according to Henry Duvall, a spokesman for the Council of the Great City Schools. The Washington-based Council represents 67 of the nation's largest school systems. The seven districts not on the list of those that had signed onto the intiative include: Charleston County, S.C., the Hawaii state department of education, the New Orleans Public Schools, New York City, Santa Ana, Calif., St. Louis, and Wichita, Kan.

--Susan Walsh/AP

Roundup of News Coverage on My Brother's Keeper Event:

Obama Announces Expansion Of My Brother's Keeper.

Largely overshadowed in the media by foreign crises and coverage of the situation at the US-Mexico border, a number of print media outlets this morning report positively on the President's visit to Walker Jones Education Center in DC. The AP (7/22, Holland) notes Obama "announced a major expansion of his initiative to improve the lives of boys and young men of color, with educators, star athletes, companies and foundations announcing partnerships to help minority boys in conjunction with his 'My Brother's Keeper' program." Said the President, "This is a movement that we're trying to build over the next year, five years, 10 years, so we can look back and say we were part of something that reversed some trends that we don't want to see."

The <u>Los Angeles Times</u> (7/22, Bratek, 3.42M) reports Obama "announced more than \$100 million in new commitments to his...initiative," which "will come from leading public and private-sector organizations, such as AT&T, the Emerson Collective, the College Board and Citi Foundation."

The <u>Tennessean</u> (7/22, Garrison, 363K) notes that also contributing will be "the National Basketball Players and the National Basketball Retired Players associations, which plans to partner with MENTOR: The National Mentoring Partnership, Team Turnaround and the Council of the Great City Schools." On its website, <u>TIME</u> (7/22, Rhodan, 24.1M) reported that yesterday's "commitments are another instance of Obama relying on the private sector to boost his second-term agenda while his efforts to work with Congress fail."

The <u>Atlanta Black Star</u> (7/22, Chiles, 64K) refers to Obama's announcement as "a major development," though it notes "the initiative has drawn fire from some segments of the Black community, particularly among prominent women such as author Alice Walker and legal scholar Anita Hill." Valerie Jarrett said on MSNBC that "the critics of MBK were operating on flawed logic." Said Jarrett, "I think the flaw in the logic is not understanding that this is not either/or, this is both/and. ... The president's approach is to create a society where nobody gets left behind, and right now our young boys of color are falling further and further behind than everybody."

Other media outlets that cover this story include <u>CNN</u> (7/22, 12.15M), <u>The Hill</u> (7/22, Sink, 237K) "Blog Briefing Room" blog, <u>Diverse Education</u> (7/22, 1K), the <u>Washington Informer</u> (7/21, 55K), and the <u>Washington Post</u> (7/21, Henderson, 4.06M) "She the People" blog.

Largest Districts Sign On To Initiative. Lesli A. Maxwel writes at the Education Week (7/22, 135K) "District Dossier" blog that "sixty of the nation's big-city school districts" making up the Council of the Great City Schools have signed onto the initiative, noting that similar initiatives are already in place in such districts as California's Oakland Unified, which "created an office of African-American male achievement with the explicit mission of 'stopping the epidemic failure of African-American male students in OUSD."

The <u>Chronicle of Philanthropy</u> (7/22, 126K) reports that the districts "represent about 40 percent of black and Latino boys living below the poverty line." Several other media outlets cover this story from the district level, including the <u>Times of San Diego</u> (7/21), the <u>Albuquerque (NM) Journal</u> (7/22,

234K), the <u>Oregonian</u> (7/22, 827K), <u>Alabama Live</u> (7/22, 75K), and the <u>Austin (TX) American Statesman</u> (7/22, 424K).

Obama Addresses Being "Authentic." The Hill (7/22, Sink, 237K) reports in its "Blog Briefing Room" blog that during his remarks, President Obama said that "the notion that black men need to act, dress or speak in a certain way to be 'authentic' is something that 'has to go.'" The piece quotes Obama saying, "The notion that there's some authentic way of being black, that if you're going to be black you have to act a certain way and wear a certain kind of clothes, ... that has to go, because there are a whole bunch of different ways for African-American men to be authentic." Obama explained that part of My Brother's Keeper's point is to expose young black men to different perspectives.

Reuters (7/22, Rampton) notes that during the event the President urged minority children to ignore those who accuse them of "acting white" because of "reading too much" or "speaking so properly." Said Obama, "The notion that there's some authentic way of being black, that if you're going to be black you have to act a certain way and wear a certain kind of clothes, that has to go. ... You don't have to act a certain way to be authentic. You just have to be who you are – and to go back to the values that you care about."

Samples of News Clips from Newspapers in Council districts:

_	ort Worth school district joins national initiative for minority bys
Fo	rt Worth Star Telegram
	rt Worth school Trustee Ashley Paz was among urban school district The nool districts are members of the Council of the Great City Schools,
Ol	klahoma City Schools Sign Presidential Education Pledge
KG	GOU
	stricts pledging to support the program Monday educate a third of the nation's black and Hispanic

RCSD Officials Meet With The President
WXXI News
They were there as part of an effort organized by a group called the Council of the Great City Schools , and they made a commitment to improve
Des Moines pledges to help minority male students
DesMoinesRegister.com
The pledge was announced Monday by the Council of the Great City Schools at a White House event attended by President Barack Obama and
APS signs pledge to help improve academic, social outcomes for 'males of color'
Albuquerque Journal
The initiative is a collaboration among 60 school districts across the country, the White House, the Council of the Great City Schools and the U.S

Long Beach Unified **school** board member Felton Williams attends White House ceremony

Long Beach Press-Telegram

Long Beach Unified **School** District belongs to the **Council** of **Great City Schools**, the main coalition of urban **schools** in the U.S. LBUSD was among 60 ...

Chicago Sun-Times

'Lost' CPS children were never lost

By Barbara Byrd-Bennett July 31, 2014 4:14PM

Updated: August 1, 2014 2:18AM

Change, the writer Kelly A. Morgan once observed, is inevitable and not always controllable. But what can be controlled is how we manage, react and work through the change process.

During the past school year, the Chicago Public Schools faced the daunting task of ensuring that more than 10,000 of our children successfully transitioned from their former closed schools to more than 400 new schools dotted across our city.

Such a task presents plenty of challenges, and no shortage of skeptics. But as we prepare for the 2014-2015 school year, it is time for us — as a school district and as a city — to step back for a moment and take a collective bow. The herculean efforts of our entire CPS community — parents, community leaders, teachers, principals and many others — transformed massive change into a success.

Recent data verified by the Illinois State Board of Education clearly show that more than 99 percent of the students some critics claimed CPS had "lost" in the closure process were enrolled in other schools in the state, transferred out of state or enrolled in a private school.

In fact, of the 847 students identified by our critics as "lost," only seven could not be accounted for by the state. Seven. That is seven students from a total of 11,729 of our children affected by the school closures.

The data went on to show that of the students no longer attending CPS schools, one in three is enrolled in another Illinois public school, while nearly half of those not re-enrolling left Illinois public schools altogether.

One "lost" child is one too many. But the horror stories about hundreds of children "lost" to the streets during this transition were simply misguided efforts to distract us from our mission to give every child in every neighborhood the great education they deserve.

The full accounting for the fate of virtually every child affected by the decision to consolidate underutilized schools is not the only good news to emerge from our efforts — it is simply the latest. Mid-term data from the 2013-2014 school year showed that grade-point averages, attendance and student-on-track rates were up, and misconducts were down, for students impacted by consolidation. We expect the final data from the past school year to continue to affirm the great work CPS students, teachers and staff are doing each day.

It is not surprising that others are taking notice. We have been invited to participate in the annual Council of the Great City Schools conference in Milwaukee this October to tell our story and share our lessons learned with representatives of the nation's largest 66 districts. While CPS staff will make several presentations, I expect we will focus on several common truths that have guided our work:

- † Our children's academic achievement and well-being come first, and we base every decision on what is best for our students. We hold high expectations for every student.
- † Every child must have access to a high-quality education. We need high standards, rigorous curriculum and powerful instruction for all, regardless of their neighborhood, diverse learning needs or English proficiency.
- † For our students to succeed we need engaged and empowered families and communities. We must find ways to remove barriers to learning with practices that promote children's health and safety and social and emotional development.
- † Our teachers, principals and administrators will be valued and developed, will hold themselves accountable and will be rewarded for success. CPS must be a place where the best talent comes to work.

We teach our children that anything worth doing is worth doing well. It is gratifying that we, as adults, have followed our own good advice.

Barbara Byrd-Bennett is CEO of the Chicago Public Schools.

WGBH (NPR-Boston)

July 23, 2014

Big Brother Is Coming To Boston School Buses

BY EDGAR B. HERWICK III

This fall, there will be some new riders on Boston's school buses.

Each of the Boston Public School systems's 750 school buses will be fit with two audio capable cameras. One will record the road, the other will record the students.

Michael Casserly, the executive director of the Council of the Great City Schools, a Washington, D.C.-based advocacy organization for America's major urban school districts, said Boston Public Schools aren't the first to put cameras on their buses.

"We think it makes a great deal of sense, particularly since the only adult on many of these buses the driver himself or herself," Casserly said.

And that driver is supposed to watching the road, not the kids. The idea is that cameras can help officials investigate and crack down on bullying and other disciplinary incidents, as well as ensure safe driving.

Chicago Public Schools, the country's third largest school system, added cameras to all of their buses last year. Paul Osland is the executive director for transportation in Chicago. He said the cameras have been put to good use.

"We do pull tapes frequently, probably several times each week. We run 1,500 buses so it's not unusual for events to be occurring on busses that cause someone to want to look at the video," Osland said.

What kind of events? All sorts.

"Student behavior issue, could be an injury that occurred, it could be an allegation that occurred, it could even be us wanting to look and see how many people are riding the bus, is our employee on the bus behaving the way their supposed to be, is the driver doing what their supposed to do?"

While the country's two largest school systems, New York and Los Angeles, have yet to add cameras to their buses, it's quickly becoming the industry standard among school systems similar to Boston's size. San Francisco has added cameras to some buses on a trial basis. Buses in Columbus, Nashville, and Fresno, Cali. all have cameras installed. In Denver they've been doing it for seven years.

Some, including the ACLU, have raised concerns about privacy.

"I think having the process and policies as to how you procure the video and protect it and who can view it, those things are all very important," Osland said.

In general, Michael Casserly of the Council of the Great City Schools, said that resistance across the country has been pretty minimal.

"We haven't had much pushback on it, as a matter of fact I think parents are generally quite pleased to know their children are safe on these busses," he said.

Of course it all comes at a cost. Boston Public School officials put the price tag at \$275,000 a year, which Casserly says is a drop in the bucket compared to the total budget of the Boston school district.

The cost is less than 1 percent of just the transportation budget, and breaks down to about \$2 per bus, per day- similar to what it costs in Chicago.

Osland says that in the Windy City, it has been money well spent. And he suspects that by this time next year, Boston officials will feel the same.

Boston adds security cameras to school buses

Says system will aid in discipline, safety

By <u>James Vaznis</u>

GLOBE STAFF JULY 21, 2014

When Boston students board their school buses this fall, they may want to watch what they say and do.

Boston is equipping all of its 750 school buses with cameras and microphones, enabling school officials to more thoroughly investigate reports of bullying, other disciplinary issues, and even traffic accidents.

Continue reading below

Each bus will be equipped with two cameras contained in a single unit mounted to the ceiling. One camera will point to the passenger area. The other will be directed at the windshield and will record what the driver sees on the road, providing potentially useful information in case of an accident.

Carl Allen, the School Department's transportation director, said no single incident prompted the high-tech monitoring.

"It's just a recognition that there are incidents and accidents that occur every year," Allen said. "And we have a strong desire to have more data so we can more quickly respond and ensure the safety of our kids and employees."

Boston will join a growing number of school systems around the state and across the country that have been installing bus cameras to crack down on discipline issues and to ensure safe driving. Some districts, such as the Howard County public schools in Maryland, introduced cameras as part of an antibullying campaign.

In other cases, legislatures spurred action. Earlier this year, Pennsylvania updated its laws on cameras on school buses to allow for audio recordings and compliance with state wire-tapping rules.

"School districts have increasingly turned to technological strategies to handle these issues," said Michael Casserly, executive director of the Council of the Great City

Schools, a research and advocacy organization for large urban systems. "School districts want to make sure kids are safe on their way to and from school and not just in school."

The use of the cameras often sparks debate, pitting safety concerns against privacy rights.

The American Civil Liberties Union says the installation of recording equipment on school buses creates a culture of fear akin to being in prison. Students will ride the school bus knowing every word they say is being monitored, said Kade Crockford, director of the Technology for Liberty Project at the ACLU of Massachusetts.

"I think that is profoundly disturbing and sends a wrong message," Crockford said. "I think schools and the school bus should be places where students can express themselves without fear of censor."

But the Anti-Defamation League, which has worked to curb school bullying, sees the cameras as a powerful tool to investigate cases of bullying that can be complicated to untangle.

"It's very clear that BPS is doing this because they have students' best interest at heart," said Robert Trestan, the New England regional director for the ADL. "What happens on a school bus inevitably has an impact in the classroom."

For the most part, Boston school officials say students behave well on the buses. The school system transports more than 30,000 students a day to both public and private schools.

During the past school year, drivers wrote up about 5,600 incident reports documenting misconduct by students, such as swearing, refusing to sit down, throwing items out the window, vandalizing property, or bothering others.

Allen said he hopes the presence of cameras might deter some of that behavior.

"As litigious as things can get, to have cameras is par for the course in big school districts," Allen said.

The system will cost about \$275,000 annually for the next four years, which covers the purchasing of the equipment and the data service.

Boston is installing a sophisticated system produced by SmartDrive Systems, a San Diego company that makes video and data recording equipment for commercial vehicles.

If a student acts up, for instance, a driver can press a button and the system will automatically e-mail the footage to transportation supervisors, who will then forward the information to a school principal or, if necessary, law enforcement to investigate.

Transportation supervisors also can go into the system after an incident and view footage. The cameras keep up to 180 hours of footage before it is deleted. Beyond those features, the device also aims to improve the fuel efficiency and performance of the drivers, noting when drivers accelerate excessively, slam on brakes, or make hard turns.

School officials stress that no one is sitting in a room monitoring students remotely as they ride the buses.

The school bus drivers' union, which raised objections a few years ago when the school system equipped buses with GPS units, could not be reached for comment.

Little if any public debate has arisen over the cameras in Boston, although the decision has not been widely publicized.

School officials decided to pursue the measure last year when they sought a new transportation company to operate Boston's fleet of buses, and they announced at Wednesday's School Committee meeting that the cameras would be operational this fall. Signs will be posted on the buses alerting passengers that the cameras will be recording both images and audio, a requirement under state wire-tapping laws.

In interviews, some parents and students expressed unease about the plans.

"My son rode the bus for three years without any incident that would indicate this is needed," said Bob Goodman of Jamaica Plain, whose son is entering the fourth grade this fall. "When you talk about a million-dollar investment over the next four years and the underfunded areas in the district, it raises questions about priorities."

Goodman said he would prefer that the money be spent on employing full-time nurses and libraries for all the schools and teacher assistants to help reduce student-teacher ratios.

Nathan Tran-Trinh, a member of the Boston Student Advisory Council who works on transportation issues, said he was torn on the issue.

"I'm usually against security cameras because they can be an invasion of privacy," said Tran-Trinh, of West Roxbury, a junior at Boston Latin School. "I think using cameras on school buses should be a last resort."

Boston Globe

Hub schools in disarray, review finds

Says lack of harmony among departments imperils education

By James Vaznis

| Globe Staff May 23, 2014

Suzanne Kreiter/Globe Staff

Interim Superintendent John McDonough said academic leaders are already working to remedy many of the problems highlighted, including taking measures to reorganize academic departments in the central office, according to a memorandum that accompanies the review.

The quality of education in Boston's schools is in jeopardy, hamstrung by academic departments that are "badly fractured, distrustful, and lacking a sense of teamwork or shared responsibility for the district's students," according to an external review commissioned by the School Department.

The rampant dysfunction filters down to individual schools, where the priorities set by academic leaders often fail to reach the classrooms.

That kind of ripple effect prevents the school system from realizing goals officials have established in efforts to overhaul it. Some districtwide scores on national standardized tests have stagnated or dropped since 2011.

"Staff members in the district do not have a clear understanding of the school system's mission, academic vision, priorities for reform, or plans for navigating the challenges ahead," according to the review, which was conducted by the Council of the Great City Schools, an advocacy and research organization.

Meg Campbell, a School Committee member who cochairs a subcommittee on school quality, said the report was troubling. She commended the school system for undertaking the review.

"There is nothing more urgent we face as a district than getting teaching and learning right," Campbell said. "People are entrusting their children to us."

The School Department has kept the review private since February, but <u>posted the findings</u> on its website Wednesday night, amid growing public pressure and a request from the Globe a day earlier to release it. The review comes on the heels of another evaluation the School Department

commissioned <u>on its food services program</u> that found widespread dysfunction and millions of dollars in financial losses.

Interim Superintendent John McDonough said academic leaders are already working to remedy many of the problems highlighted, including taking measures to reorganize academic departments in the central office, according to a memorandum that accompanies the review.

McDonough said in the memorandum that the review pointed out good practices, as well as challenges. He said the findings were not released sooner because the report is a draft and the final version is not yet complete.

"You will notice that the difficulties raised in [the review] are familiar ones that we, the School Committee, and individual school leaders and teachers have raised before," said McDonough in the memorandum, which was dated May 21. "These are areas that we as a district have often struggled to resolve systematically."

McDonough could not be reached for comment. The chief financial officer of the system since 1996, McDonough has served as interim superintendent since June. A search committee decided earlier this month to extend its hunt into next year, meaning he will probably remain in charge until then.

Boston has been struggling for years to bolster the quality of its schools. More than half of the city's schools <u>rank in the state's bottom 20 percent</u> on the Massachusetts Comprehensive Assessment System exams, and last fall state education officials decided to take over two schools, a first for Boston.

Reading has been particularly problematic in Boston's classrooms. Only slightly more than 30 percent of third- and fourth-graders were proficient in reading on the MCAS, according to last spring's results, the most recent data available. Math scores were only marginally better, according to the data.

Often, teachers are blamed for low achievement, but high turnover in key academic positions in central offices has been a factor in Boston's problems. For instance, during Carol R. Johnson's six-year tenure as superintendent she had a different chief academic officer nearly every year. The turnover of officials has raised concerns among teachers and principals for years that the school system's academic mission is adrift.

The review indicates the problems are indeed systemic, spurred by disorganization, competing interests in the central office, and vacancies in many key positions in the central office, particularly in its support networks for schools, which are supposed to assist principals and teachers with operational and academic issues. It also cited a lack of coordination among academic departments, special education, and the office of English language learners.

"In sum, the challenges facing Boston public schools are great, but not insurmountable," the review concluded.

Richard Stutman, president of the Boston Teachers Union, said power struggles between different departments in the central office have long concerned rank-and-file educators.

"The casualties here are the teachers," Stutman said. "The teachers have to absorb a lot of the uncertainty and dissension. It's not helpful to have people vying for power in the central office."

The review team interviewed 54 high-ranking district administrators, as well as principals, teachers, and parents.

Beyond organizational issues, the review raised a host of questions about academic priorities and programs.

The district's work to revamp English and math instruction so it aligns with a new set of national standards adopted by the state "seems to have been displaced by its work on teacher evaluations," the report says, and a lot of professional development has focused on explaining how the new evaluation system works.

The trade-off comes as districts across Massachusetts begin trying out an online state testing system based on the new national standards that could replace the MCAS as the barometer the state uses to judge school quality. The state Board of Elementary and Secondary Education will make that decision next year.

The review also said that district staff criticized the Reading Street program, adopted a few years ago in elementary schools to boost reading scores. Staff said they were not confident the program is producing better results for students and does not appear to mesh with new national standards for reading instruction.

Despite the problems, the review found several positive aspects. It said the school system's work to put in place the new national academic standards is among the most robust in the nation, that some English and math units it developed were of high quality even though they were not implemented well, and that nearly half the schools designated by the state as underperforming in 2010 have rebounded.

It also praised McDonough's decision to give principals more leeway to hire from outside, instead of forcing them to pull from a pool of internal candidates.

Barbara Fields — the school system's former equity officer, who oversaw diversity initiatives — said it will take strong leadership from McDonough to break down silos in the central office and get people to work together.

"If John can't pull together the team, we will see progress with some kids, but not systemic progress," Fields said.

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Boston Globe

Boston schools food program in chaos, report finds

Report details losses, hostile workplace

By James Vaznis

Globe Staff May 19, 2014

Widespread dysfunction in the Boston school system's food service program is leading to millions of dollars in losses each year and creating an apparent "hostile work environment" for employees, according to an external review obtained by the Globe.

The review, commissioned by the School Department and completed last month, found the program had lost more than \$21 million over the past eight years, even after the department took steps to rein in costs and increase revenue, such as raising school lunch prices.

The management problems are so dire that the food program even lacks a system to alert cafeteria cashiers about students with food allergies, potentially putting the students at risk, according to the review by the Council of the Great City Schools, a national consulting and advocacy organization. And the food services frequently plans menus — without consulting individual cafeteria managers — that include products that are unavailable, creating last-minute disarray.

On Sunday, interim Superintendent John McDonough called the findings both "hard-hitting" and "disturbing." He said the School Department already is taking steps to address some of the problems, such as having the finance division oversee food services instead of operations.

"The review did uncover and made allegations about severe deficiencies that require strong action," McDonough said in an interview, adding that he was most surprised by the work conditions employees faced.

"Under no circumstances in BPS will we tolerate a hostile work environment," McDonough said.

In the review, employees described the leadership style of food service administrators as "management by intimidation." It noted "several employees became extremely emotional" during interviews, while others refused to speak for fear of reprisal.

Cafeteria managers told interviewers they were threatened with reprimand if they asked too many questions of the central food office. Employees also said their e-mails and phone calls to the food service department often went unanswered.

The food service program has been saddled with problems for years. Most notably, in 2011, then-City Councilor John Connolly conducted a surprise inspection of several cafeterias that revealed that taco meat, cheese, and other food items were kept in freezers well beyond their expiration dates.

In response, the School Department ousted its food service manager, and under new leadership the program appeared to be heading in the right direction. Over the last two years, food services took advantage of special government program to make breakfasts and lunches free for all students regardless of family income, and even started a free food truck last summer that traveled to neighborhoods with a high concentration of low-income youths.

But unbeknown to many school observers, the program's annual deficits began to rise again. The deficit for last year was \$3.6 million and is on track to reach that level again — a situation similar to the financial crisis the program faced about five years ago. Last year's deficit prompted the School Department to commission the review.

Running a deficit in a program that is supposed to be self-funding is problematic, said Samuel Tyler, president of the Boston Municipal Research Bureau, a government watchdog.

"We thought the meal problem had been solved, but apparently that was not the case," said Tyler, who had not seen a copy of the review. "That means there are dollars allocated to food services that could be better utilized for classroom supplies or other educational needs."

In the past, the School Department has largely chalked up the deficit to rising food costs and, until the switch to free meals, families who did not pay their lunch bills.

It also said schools sometimes gave away meals to students whose families failed to fill out applications for federally subsidized free meals, causing the School Department to pick up the cost instead of the US government.

But the review, which described the School Department as "extraordinarily tolerant" of the financial losses, said the deficit "may reflect a lack of organizational will to address the underlying structural issues within the program."

The program, for instance, has no long-term strategic business plan and "does not have people with the appropriate skill sets, backgrounds, and training in several key management positions," the review said.

McDonough said he was unsure if he agreed with the assertion about unqualified managers.

In many ways, the program largely is still functioning in a pencil-and-paper mind-set, paying vendors with paper vouchers and tabulating worker hours on time sheets. The program also lacks

some basic financial protocols, such as a failure to reconcile the number of meals sold at the cafeterias with what is billed by a private contractor that supplies meals to the dozen of schools that have no kitchens.

To fix the problems, the review came up with more than two dozen recommendations, including fully utilizing federal commodities to reduce food costs, computerizing the process of ordering food and tracking work hours, and creating a strategic business plan.

McDonough is expected to give the School Committee a summary of the review at its meeting Wednesday and a more thorough presentation in the coming weeks.

Michael O'Neill, the School Committee chairman, said he takes the recommendations with the "utmost seriousness" and expects they will be implemented. He said it was disappointing to see the deficit levels grow again and to learn of the work conditions that cafeteria workers may face.

"We need a work environment where they feel valued and appreciated," said O'Neill, sharing a story about how some cafeteria workers send leftovers home with their students so they can have a meal later. "They know the social and emotional well-being of our students."

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WLRN Public Radio (NPR) Miami

City Schools Say They'll Get Less Money If Federal Internet Program Is Updated

July 9, 2014 | 10:57 AM

By John O'Connor

City school districts say a plan to expand a federal program that helps schools and libraries purchase high-speed Internet access will actually reduce the amount of money those districts receive.

Miami-Dade school officials and the Council of Great City Schools said proposed changes to the E-Rate program will force city school districts to pay more to match federal grants and reduce the overall value of those grants.

That's because the Federal Communications Commission has proposed changing how the grants are prioritized and funded in order to modernize the program. E-Rate is a grant program funded by taxes on phones and other communications. The program helps schools and libraries purchase high-speed Internet.

The goal is to put a higher priority on wireless networking. Wireless grants were only funded if any of the \$2.3 billion E-Rate money was left over after wired grants were awarded. Few wireless grants were funded the past few years.

The proposal would also add \$2 billion over the next two years.

The FCC could vote on the proposal Friday.

But districts that found a way to pay for wireless — such as Miami-Dade — said they'll get less money because they'll appear to have less need for wireless grants. The district sought and won a \$1.2 billion bond and used that money and E-Rate grants to update schools. Work will be completed this year.

"It's kind of a penalty on us for doing what they wanted us to do," said Debbie Karcher, chief of information technology for Miami-Dade schools. "We went to a lot of trouble to use E-Rate and do it."

The FCC proposal also changes the way the grants are funded. Under the current rules, school districts pay between 10 percent and 80 percent of the project's total cost. Most

urban districts pay a local match of just 10 percent because they have a high percentage of low-income students.

The minimum match would increase to 20 percent of the project's total cost, according to the FCC proposal.

"E-Rate will contribute four dollars for every one dollar spent by the poorest schools,"

Manish Naik with the Council of Great City Schools wrote in the group's newsletter, "but this change actually doubles the financial cost that will be incurred by high poverty districts."

Miami-Dade's Karcher wants grants to be given out based on the number of students enrolled, and to give districts more flexibility in how they spend the money for networking. And both Karcher and the Council of Great City Schools said the FCC needs to add more money to E-Rate — and not just shift funding from other sources.

"We can't keep funding this much technology on the dollars allocated 12 years ago," Karcher said.

Schools in Florida and across the nation are undergoing a digital overhaul right now. New online exams tied Common Core standards fully adopted by Florida and 42 other states will test school networks. And Florida lawmakers have required half of all classroom instruction is delivered digitally — whether through electronic textbooks, web content, high-tech classroom tools or other means — by the time classes start in 2015.

Politico

Advocates anxious about E-Rate proposal

By Caitlin Emma 6/13/14 5:00 AM EDT

The very groups that the Obama administration wants to help through an effort to connect the overwhelming majority of students nationwide to high-speed Internet say they have "grave concerns" about where that effort is headed.

Federal Communications Commission Chairman Tom Wheeler is <u>expected</u> to circulate his proposal for modernizing the E-Rate program among his fellow commissioners next week, and FCC officials told <u>The New York Times</u> that Wheeler wants his proposal on the commission's July 11 meeting agenda. He wants the FCC to act soon so that a modernized version of the program can take effect by the 2015 school year.

But groups representing urban, suburban and rural schools; superintendents; teachers; libraries; and others say that what they know of Wheeler's fast-moving proposal could undo the program's success thus far.

The groups have not seen Wheeler's proposal, but in meetings with FCC staff and others familiar with his plans, their understanding is that it will be the exact opposite of what many E-Rate beneficiaries have hoped for: It does not provide a permanent boost in funding. A possible per-pupil funding model that has been <u>bandied about</u> might put some schools at a disadvantage. And it does not include incentives for telecom companies to help connect schools that need it most.

Mary Kusler, government relations director of the National Education Association, said the commission has historically listened to schools and libraries when it comes to the E-Rate program, "but this is the first time that we feel like decisions are being made by people who aren't listening," she said.

Annual demand for the program is routinely more than double the \$2.4 billion funding cap. But Wheeler is expected to propose the \$2 billion in existing funds as if it will be enough, said Kusler and Jeff Simering, director of legislative services for the Council of the Great City Schools.

The Obama administration has said that by shifting around \$2 billion in existing funds and soliciting another \$2 billion in contributions from private companies, the U.S. is on its way to expanding broadband access for schools and libraries.

But even with those additional billions, ed tech groups have said the administration's vision to connect all students won't be possible without a permanent increase to the program's funding cap. "It does appear that virtually the entire school community is very, very concerned about this," Simering said. "There isn't going to be enough money to connect every school in the nation."

An FCC spokesperson stressed that Wheeler is open to assessing the needs of the program down the line but wouldn't go into great detail about the proposal.

Sen. Jay Rockefeller, one of the original architects of the E-Rate program, also believes additional permanent funding is critical.

"The senator is keenly aware of the concerns raised by the education community and has a history of agreeing with the schools' and libraries' priorities for E-Rate," a spokesperson said. "He will continue to work with them as he works with the FCC on expanding and strengthening the E-Rate program. The senator remains steadfast in his belief that additional permanent funding for E-Rate is necessary."

Wheeler's proposal might align more closely with ideas pitched by Republican Commissioner Ajit Pai than it does with some pitched by Democratic Commissioner Jessica Rosenworcel, who has made reforming the E-Rate program one of her legacy issues.

In late March, Pai <u>testified</u> before a Senate Appropriations subcommittee and said the program shouldn't get a budget boost.

"Chairman Wheeler appears to be on the same page," Pai added at the time.

Pai said the program shouldn't get more money without finding corresponding savings in the Universal Service fund, which administers the E-Rate program.

Groups say that another idea pitched by Pai, which many E-Rate beneficiaries wrote off as harmful, appears to be part of Wheeler's proposal. In July 2013, Pai <u>proposed</u> a "student-centered" per-pupil funding model with a boost for rural and low-income students. He has said it would <u>deter waste</u> because it would require schools to match some of the funds.

But an FCC spokesperson said that no decisions have been made about allocation models and the per-pupil allocation model is still under discussion.

If Wheeler runs with that idea, it would prove detrimental for rural schools, said Robert Mahaffey, director of communications for The Rural School and Community Trust. Allocating E-Rate resources per pupil dooms small rural schools to continue to receive less money — though historically, they have had the most difficult time accessing high-speed Internet.

"We share many of the grave concerns about the direction that Chairman Wheeler and the FCC are going in this regard," Mahaffey said. "We join many advocates in voicing our deep concern about changing that funding model ... the FCC would be well advised to look at the impact that changing the formula would have on kids in these areas of the country."

Simering said a few of the districts CGCS represents — all of which are among the largest in the country — would like the per-pupil funding model because it's predicable, "but I think the bulk of our folks believe that once they set those per-pupil amounts, they're going to be wholly inadequate to meet needs that change every year. It would cap our allocations regardless of our needs or circumstances," he said.

Kusler said the funding model doesn't need changing. The program needs updating — and it needs more money.

"This program has operated incredibly well for almost 18 years now," she said. "It's not broken. But we shouldn't think that we're going to meet the president's goals with a funding level set in 1996."

Kusler said Wheeler's proposal also offers no incentives for telecom companies to make their pricing transparent or build out to schools that need high-speed connections the most, including rural schools.

An FCC spokesperson stressed that Wheeler wants telecom companies to be transparent in all of their dealings. And Wheeler's proposal addresses many concerns held by education groups, the spokesperson said.

On Thursday, more than 100 organizations sent the FCC <u>a letter</u> detailing their recommendations for reform. Two of the recommendations outlined by the letter — increasing the capacity of Internet connections, including Wi-Fi, and prioritizing high-capacity broadband — are already part of the proposal, the spokesperson said.

But the groups representing the beneficiary groups aren't reassured.

"We feel like the commission is moving forward and it's ignoring the fact that the underlying program is a big success, so we worry that some of the changes they're going to propose are going to be very problematic and undo success of the program," Kusler said.

"We're hoping that the people who are working on the details can actually work through some of these things and get some of it right," Simering said, "but we're not seeing a lot of reason for optimism at this point."

Baton Rouge Advocate

Study: EBR schools' white, middle class kids get a good education; poor, black kids lacking

by Charles Lussier, April 18, 2014

clussier@theadvocate.com

Math test scores compared

If you're white, you have enough money to pay for your lunch and you attend an East Baton Rouge Parish public school, you're getting among the best educations among urban districts across the U.S., according to new study by the Council of Great City Schools.

But if you are black and qualify for a free or reduced-price lunch, an indicator of student poverty, your education is at or below average among the 21 urban school districts the council used for comparison.

The <u>study</u> was requested by the parish school system, one of 67 districts that pay dues for membership in the Washington, D.C., <u>organization</u>.

The <u>results</u> were presented Thursday morning at the School Board's Instructional Resource Center.

Superintendent Bernard Taylor said he asked the council to conduct the study because he knows some people won't believe it if such research were done in-house.

Taylor said he gave the council no special directives, except to compare student achievement in the parish with similar urban school districts across the country.

"There's no spin, no scrubbing," he said. "However it would manifest itself, it would manifest itself."

Michael Casserly, executive director of the council, presented the data along with Ray Hart, its director of research.

The organization gathered reading and math scores in fourth and eighth grades. It converted scale scores from East Baton Rouge Parish's LEAP test in 2012 to the scale used that same year on the National Assessment of Educational Progress.

NAEP is often referred to as the "nation's report card."

Twenty-one urban school districts test enough students for their own NAEP results. The council also compared all the districts, including East Baton Rouge, with a sample of private school students nationwide.

"In summary, it looks like this, that EBR scores are somewhat lower than other urban districts, mostly because of your poverty," Casserly said.

These school districts tend to have high concentrations of poor and minority children, but East Baton Rouge, with 80 percent or more in both categories, typically has even more, he said.

Also, half of the parish's much smaller population of white students live in poverty, much higher than the comparison districts, he said.

Math scores for East Baton Rouge Parish black children living in poverty were in the middle of the pack, according to the council, while reading scores were well behind those of other urban districts, a problem that worsened by eighth grade.

Hart cited Atlanta and Baltimore as districts that are doing better than the norm in reading instruction. He said East Baton Rouge Parish might want to examine such districts as it figures out ways to improve.

When the council looked at the scores of higher-income students who can afford their own lunch, East Baton Rouge Parish fourth- and eighth graders — black, white and Hispanic — ranked at or near the top.

"There's no reason to think students in those schools do better, either in another district, or if they went private school," Casserly said.

"This clearly shows that we are adept at educating middle-class children," Taylor concluded after the presentation.

Taylor said it also shows that the district has work to do to catch up with other districts when it comes to educating children in poverty.

"Clearly, our budget needs to reflect how do we help the children who need the most help," he said.

New Orleans Times Picayune

East Baton Rouge school system touts test scores compared to other urban districts

Michael Casserly, executive director of the Council of the Great City Schools, presented an analysis of East Baton Rouge Parish school test scores at a meeting Thursday. (Diana Samuels, NOLA.com | The Times-Picayune)

Diana Samuels, NOLA.com | The Times-Picayune By Diana Samuels, NOLA.com | The Times-Picayune Email the author | Follow on Twitter on April 17, 2014 at 7:40 PM, updated April 18, 2014 at 11:31 AM

The **East Baton Rouge Parish School System** fired back Thursday against critics who say their children would be better educated elsewhere -- like a new school district in the proposed city of St. George. The district brought in an outside group that compared the district's test scores to others around the country.

The Washington, D.C.-based **Council of the Great City Schools** studied East Baton Rouge test results and found that the district's more affluent students do very well compared to other more affluent students nationwide. However, the district's results for lower-income students, who make up a large majority of East Baton Rouge's student population, are not as rosy.

East Baton Rouge has a very high percentage of students from low-income families who are eligible for free or reduced lunch: 81.1 percent of the district's students qualify for the federal program, compared to an average of 66.4 percent across Louisiana.

The Council of the Great City Schools, which advocates for urban school systems, took East Baton Rouge's data from its fourth and eighth grade LEAP tests, and translated it so it was comparable to other districts' results from the National Assessment of Educational Progress, a testing system used elsewhere.

Superintendent Bernard Taylor said Thursday at a meeting to present the study that he didn't ask the group to skew the data to make East Baton Rouge look good.

"I did not ask them to do anything with this data other than analyze it and present it," he said. "At the end of the day, what I want to be able to show is, are our students performing in a manner that says we are moving forward, or are they performing in a manner that says they're going backward."

The analysis found that, when you look at average scores from all students in the district, East Baton Rouge places somewhat below average among 21 other urban districts. For fourth grade math, for example, the district was 14th out of 21. For eighth grade reading, the district was 17th out of 21. The districts it beat were Cleveland, Detroit, Milwaukee, Fresno, Calif., and the District of Columbia.

When you look at students whose families are better-off and don't qualify for free or reduced lunch, though, the picture changes dramatically. Though they makes up less than 20 percent of the district, East Baton Rouge's non-free or reduced lunch students frequently outperform their peers nationwide, often regardless of race. For example, among black 8th graders who don't qualify for free and reduced lunch, East Baton Rouge's math scores placed first among the districts studied, as well as placing ahead of national private school averages. Scores on the reading tests for those more affluent white fourth graders also placed the district first.

But the vast majority of students in the district fall into the free-and-reduced lunch category, and that's where the scores are much lower. For example, black students who are eligible for the national school lunch program ranked 16th out of 21, compared to low-income students in other urban districts.

"You can see here the power of income levels on overall student performance," said Michael Casserly, executive director of the Council of Great City Schools.

He then referred to the efforts to create the city of St. George and form a new school district in the whiter, more affluent southern portion of the parish.

"The results here suggest there is room for improvement among your poorest students," Casserly said. "Still, there is little evidence to suggest that students in the schools breaking away from the district would do better in English-Language Arts or math if they were part of a new district."

He suggested the school focus strategically on improving the academic achievements of the poorer students. District officials spoke about their work **to expand Pre-K programs** and **offer bonuses to attract highly-rated teachers** to come to lower-performing schools.

Taylor also took aim at people who testified at the State Capitol Wednesday night in favor of a bill to restructure the school system, and others who have criticized the district.

"I hope this dispels this running thing that that this district is an abject failure, because that was said (last night)," he said. "I hope this dispels that, so we will never hear again that the district is an abject failure, because clearly it is not."

The results of the study are available **on the district's homepage**.

Education Week

Published in Print: May 7, 2014,

School Budget Problems Have Deep Roots in Philadelphia

District's problems seen as chronic

By Denisa R. Superville

Philadelphia

For the second year in a row, the public schools here face the possibility of hundreds of layoffs, larger class sizes, and fewer programs.

The problem for the Philadelphia district is revenue, or a lack thereof, according to Superintendent William R. Hite, who described what has amounted to an annual cycle of deep budget cuts as "immoral."

Urban school districts, to be sure, have had their share of financial challenges, but Philadelphia's case appears to be far more acute and intractable, a confluence of politics and money, ability, and means.

"At the root of the issue is a lack of consistent long-term financial support from the state," said Michael Casserly, the executive director of the Council of the Great City Schools, a Washington-based advocacy group for large urban districts. He described Philadelphia as "the most underresourced urban school district in the nation."

"For decades now, the state has very poorly funded the school district, and the chickens have now come home to roost," he added. Jonathan A. Supovitz, the director of the Consortium for Policy Research in Education, or CPRE, at the University of Pennsylvania, agreed that the city has lost some influence with lawmakers in Harrisburg, the state capital.

"Historically, Philadelphia has been inefficient," Mr. Supovitz said, "and increasingly the legislature has been dominated by nonurban forces that have been reluctant to put more money into what has been seen as an ineffective system."

Confluence of Costs

While the problem has historical roots, it is sustained by the district's inability to levy taxes; the increasing cost to the district of charter schools, which are expected to enroll 71,927 students by the 2014-15 school year and now account for 30.7 percent of the budget; and, more recently, a rise in debt-service payments, which now claim 11 percent of the district's budget. The district is also still reeling from statewide education cuts in 2011 of almost \$1 billion, which coincided with the end of the federal economic-stimulus aid that it had relied on to cover some operating costs.

Philadelphia's financing problem mirrors that of other districts in a state without a statewide funding formula and where districts rely year to year on the whims and political calculations of legislators for a portion of their funds.

But the effects may be magnified here because of the district's size—nearly 132,000 students are in district-run schools—and a largely disadvantaged student body whose needs often require additional resources, said Michael Churchill, a staff lawyer at the Public Interest Law Center of Pennsylvania.

If there is no legislative action leading to a more transparent and consistent funding formula, the legal-advocacy group may sue the state, he said, for what it believes to be a violation of the state's constitutional mandate for a "thorough and efficient" education for its students.

"This [crisis] is not arising because the district is spending its money wastefully," Mr. Churchill said. "This is arising because the basic cost of education has been rising and the funding has not. You can't continue to try to bring those in line by cutting your way out of the problem, because you've reached the point where you can no longer provide the services that are required, and because it's a prescription for disaster for students."

Last year, Philadelphia's financial woes were catapulted into the national spotlight as the district laid off more than 3,000 workers and closed two dozen schools in an effort to come to terms with a \$304 million budget deficit. Mr. Hite threatened that he would not open school in September without an additional \$50 million. Even so, schools opened with greatly diminished capacity, in some cases, without full-time guidance counselors, assistant principals, lunch aides, and librarians.

Deficits Remain

Though no school closures have been forecast as part of this year's budget, the future is no less bleak. The \$2.49 billion budget plan released last month includes a \$216 million deficit—about \$120 million of which the district hopes would come from raising the city's sales tax.

To pay for additional programs—extracurricular activities, Advanced Placement courses, and early-childhood-literacy programs—Mr. Hite is requesting an additional \$320 million. Of that amount, \$150 million would come from the state, \$75 million from the city, and \$95 million in savings from the district's unions.

"No other agency in the commonwealth of Pennsylvania has closed the number of facilities we've closed, reduced its workforce by the thousands that we have reduced our workforce, had two concessionary labor contracts—not one, but two—and borrowed \$300 million two years ago, and we're still facing a \$216 million deficit," Mr. Hite said last week, after a budget hearing in which the spending plan was roundly panned.

Mr. Hite and the School Reform Commission, the five-member board that has overseen the school system since a 2001 state takeover, are asking Philadelphians to lobby the city council, the governor's office, and the legislature for more money. Whether they succeed is yet to be seen.

Neither Tim Eller, a spokesman for the state education department, nor Jay Pagni, a spokesman for Gov. TomCorbett, replied to requests for comment last week. But in **comments to the** *Philadelphia Inquirer*, Mr. Pagni said that it was "past time" for the city council and teachers' union to support the district as the state had.

Pointing Fingers

City Council President Darrell L. Clarke would like any money raised from the extension of the sales tax to be split between the city—to cover unfunded pension obligations—and the school district's requests. In addition, Mr. Clarke wants any future financial help to the district to be contingent on creation of an independent **oversight body** to focus on its finances.

A spokeswoman for Mr. Clarke said he remained "deeply concerned" about the district's financial instability and noted that the council has raised taxes and additional revenue over the years to make up for state funding cuts.

"Council President Clarke continues to seek long-term, sustainable funding for all Pennsylvania public schools that includes restoration of a fair funding formula and reimbursements for charter school costs," Mr. Clarke's spokeswoman, Jane Roh, said in an email.

It's also unclear what concessions might come from the Philadelphia Federation of Teachers. Jerry Jordan, the president of the American Federation of Teachers affiliate, said the district has not said what portion of the \$95 million in savings from its employee unions it expects to come from the teachers' union.

But he said teachers were already contributing their share: They have worked for three years without a salary increase and routinely dip into their pockets to pay for classroom supplies.

Mr. Jordan also blamed the state for the financial crisis, saying that it was the state's duty—not the union's—to fund the schools under the Pennsylvania Constitution.

For their part, advocates and parents have been lobbying local and state officials to stave off the cuts.

At the first of a series of district budget hearings last week, a few speakers called for abolishing the reform commission. And some believe that with Gov. Corbett, a Republican, facing re-election in November, this might be the year that something changes in the way local schools are financed.

If not, the long-term consequences could be dire.

"We just can't have more layoffs, [and] skeletal school structures," said Susan Gobreski, the executive director of Education Voters Pennsylvania, a nonprofit that advocates for sound education policies. "It's too important to the community's health and economic well-being to have good public schools that are authentically available to every person in every neighborhood in the city," she added.

New York Times

Philadelphia Teachers Hit by Latest Cuts

By MOTOKO RICH OCT. 15, 2014

PHILADELPHIA — Money is so short at Feltonville School of Arts and Sciences, a public middle school here, that a nurse works only three afternoons a week, leaving the principal to oversee the daily medication of 10 children, including a diabetic who needs insulin shots. On the third floor filled with 200 seventh and eighth graders, one of two restrooms remains locked because there are not enough hall monitors. And in a sixth-grade math class of 33 students with only 11 textbooks to go around, the teacher rations paper used to print out homework equations.

"When you are given a loaf of bread, you have to make it last as long as you can," said Michael Adelson, the math teacher. Feltonville serves 541 students, close to 80 percent of whom come from low-income families.

Such is the state of austerity across Philadelphia, where this fall, the schools <u>almost did not open on time</u>, and the district has eliminated 5,000 staff positions and closed 31 schools over the last two years. Feltonville alone has lost 15 teachers, two assistant principals, two guidance counselors, an office secretary, three campus police officers, 10 aides who supervised the cafeteria and hallways, and an operations officer, who oversaw most of the school's day-to-day logistics.

With state education funding down 8 percent from 2011 and pension costs rising, the city and school district have searched desperately for new sources of revenue to close an \$81 million deficit.

Like a tenant overturning sofa cushions looking for quarters to pay the rent, the city has raised property taxes twice in three years and imposed a new sales tax, and last month Gov. Tom Corbett signed a law that would allow Philadelphia to impose a \$2 tax on each pack of cigarettes sold in the city.

The latest fund-raising effort came last week when the School Reform Commission, the state-appointed board that oversees the Philadelphia schools, unilaterally and abruptly canceled the union contract for teachers and required them to pay minimum health care premiums from \$25 to \$67 a month for a single person. Until now, teachers have not paid for health insurance.

The move came seven months after members of the principals' union agreed to pay for part of their health insurance and cut their contract to 10 months from a full year, effectively reducing their wages.

The imposition of some health care costs on the teachers, which the union, the Philadelphia Federation of Teachers, pledges to contest in court, is expected to generate about \$44 million for the operating budget this school year, closing the budget gap.

At Feltonville, the school will receive \$67,625 to add to its operating budget, which is currently less than \$13,000 for the year. Michael Reid, the principal, said it would not be enough, however, to hire back even one teacher.

William R. Hite Jr., the superintendent, said he wished he could give teachers a raise. "But we have to share sacrifices in order to navigate this challenging fiscal time that we are working through," Dr. Hite said in an interview at the school district's offices.

Bill Green, the chairman of the School Reform Commission in Philadelphia, said he had become frustrated after 21 months of negotiating with the teachers' union, which had offered no more than \$2 million in total concessions. He described the contract cancellation as a last resort.

"We are not seeking wage reductions, and we believe we're seeking reasonable contributions for health care along the lines — and in fact better than — most workers in America," Mr. Green said.

Jerry Jordan, the president of the Philadelphia Federation of Teachers, said the union was willing to offer concessions on benefits totaling \$24 million, including some contributions to health care. He also noted that teachers had forgone pay increases for two years in a row, and that suburban teachers nearby made as much as 20 percent more. Philadelphia elementary school teachers make an average of \$68,600, while middle and high school teachers earn an average salary of \$72,200.

Labor experts said that even if teachers in Philadelphia might eventually have conceded the need to pay for benefits, canceling their contract — which expired in August 2013 — was a nuclear option. "This is essentially declaring war on the union," said Gary N. Chaison, a professor of labor relations at Clark University in Worcester, Mass.

Teachers, who have taken on additional duties covering recess and lunch, as well as counseling and even medical care, are dispirited.

"I am not a volunteer, and I am not a saint," said Amy Roat, a 20-year veteran who works with children learning English as a second language at Feltonville. "I am a teacher."

Philadelphia's struggles, while the most acute in Pennsylvania, reflect funding crises elsewhere in the state. Critics of the state's financing of education say that it is largely to blame.

"It really belongs at the doorstep of the state that has been starving the school district for generations," said Michael Casserly, the executive director of the <u>Council of the Great City Schools</u>, a coalition that represents large urban school districts.

According to the Pennsylvania Budget and Policy Center, a nonprofit policy research group, Mr. Corbett has cut close to \$1 billion from the state's education budget. But an administration spokesman said that such an analysis counted some federal stimulus money and that state funding has increased since 2011.

"Is anything ever enough?" said Carolyn C. Dumaresq, acting secretary of education in Pennsylvania and an appointee of Mr. Corbett. "I really think \$1.3 billion is a lot of money," she said, referring to the state's allocation to Philadelphia, a district of about 131,360 students and close to 60,800 in charter schools. As a former district superintendent, she said, "I could have always found more ways to spend more money, but at some point in time you have to balance that against the taxpayers' ability to pay."

In Philadelphia, students, who organized a <u>walkout and demonstrations</u> last week to protest the cancellation of their teachers' contract, worry that soon no one will want to work in the district.

"I really hope that this type of thing doesn't drive great teachers out of the city," said Nikki Adeli, a senior at Science Leadership Academy, a magnet high school in central Philadelphia, who is also a youth commissioner to Mayor Michael A. Nutter.

Parents are concerned that some schools cannot provide the most basic services. At Anna Lane Lingelbach Elementary School, on the border between the Mount Airy and Germantown neighborhoods, where virtually all of the students come from low-income families, kindergartners have recess in a side yard where the asphalt is pockmarked with spidery cracks. The security desk in the front lobby stands empty.

"I wish I could afford to send them to another school," Keith Dorsey said one afternoon last week as he picked up his third-grade son, Brandon.

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Tampa Bay Times

Editorial: Pitch in to help male students of color

Thursday, July 31, 2014 11:46am

The Hillsborough County School District has taken a step toward narrowing the achievement gap by joining a national initiative that focuses on African-American and Hispanic boys. This is not new territory for Hillsborough. But the district's participation should ensure that reversing minority underachievement remains among its top priorities. The entire community should make sure it succeeds.

The initiative is spearheaded by the Council of the Great City Schools, a national group of 67 urban school systems that educates more than one-third of the nation's black and Hispanic males. The council invited its members to participate in response to a call from the Obama administration. In February, President Barack Obama launched My Brother's Keeper, a program aimed at helping boys and young men of color prepare for college and careers.

At a news conference with Obama in Washington last week, 60 urban school districts — including five from Florida — agreed to carry out specific actions to uplift young men of color. Each district customized its own pledge. Hillsborough's plans include increasing the pipeline of students who are on track for academic success, increasing the number of students in advanced classes and decreasing the number of minorities who are suspended, expelled, chronically absent or placed inappropriately in special education classes. The district also wants to transform high schools with persistently low graduation rates among males of color and extend the same help to young women of color who face similar obstacles.

The district has worked to narrow the achievement gap between white and minority students through efforts that range from placing larger numbers of minority students in more rigorous academic classes to hosting focus groups directed to black and Hispanic males. This year, it plans to introduce a program that connects students who have attendance, behavior or academic issues with school personnel charged with making sure they are on track to graduate.

And there has been progress. Graduation rates are rising, and there are declines in the number of out-of-school suspensions. But the challenge remains great. In a district where the average graduation rate for all males is nearly 69 percent, just 54 percent of black males and nearly 64 percent of Hispanic males graduated in 2012. The number of students suspended or sent to alternative suspension sites also remains high, with more than 3,000 assignments for minority males in the 2013-2014 school year.

The entire community should embrace the district's pledge to minority youth and commit the resources to make sure it succeeds. Business owners, community leaders, faith-based groups,

fraternal organizations, parents and neighbors all should find ways to help. No amount of assistance or volunteer work is too small.

Each student the district has pledged to help is worthy of the investment. The opportunities they receive could mean the difference between a path toward upward mobility or a more uncertain trajectory.

Editorial: Pitch in to help male students of color 07/31/14 [Last modified: Thursday, July 31, 2014 11:46am]

Washington Post

Mr. Obama's promising My Brother's Keeper initiative

By Editorial Board July 25, 2014

THESE ARE the depressing facts about boys and young men of color: They are more likely to drop out of school, more likely to be in prison, more likely to be unemployed and more likely to die at an earlier age. That minority men are at disproportionate risk throughout their lives has largely been seen as unavoidable. The beauty of President Obama's public-private initiative to create better futures for them is its refusal to accept these outcomes as inevitable.

My Brother's Keeper, a five-year, \$200 million effort focused on improving opportunities for black and Hispanic youth, was launched in February. It got a boost this week with the announcement of new commitments from the private sector. Equally important is the decision by 60 of the nation's largest school districts to join the effort by implementing evidence-based strategies to improve outcomes.

The urban districts signing on to My Brother's Keeper are home to about 40 percent of all African American and Hispanic boys living below the poverty line. While there have been sporadic efforts in the past to help young minority men, this is the most comprehensive effort. Michael Casserly, director of the Council of the Great City Schools, which is coordinating the effort, said some districts have made progress in some areas but, because no school system has it all figured out, there is value in sharing strategies. What's the best way to reduce suspensions? Encourage early reading? Increase the number of minorities in Advanced Placement classes?

The initiative involves no new federal spending; the bully pulpit of the White House — and the president's appreciation of the importance of life supports in opening opportunities — has elicited millions of dollars in private money for a range of programs. Boys, of course, are not the only children who struggle, but criticism of the initiative for excluding girls seems misplaced. Boys of color lag so far behind that an intense effort targeted on gender- and race-specific issues is appropriate. Many of the strategies being put in place will also benefit girls, and other efforts underway are tailored to their needs, including creating more opportunities for them in science and math.

The country as a whole will gain when males of color are able to realize their potential, rather than ending up on the streets, in jail or in the morgue.

St. Louis Post-Dispatch

Editorial: St. Louis district right to try a bold step to lift low-achieving schools

MARCH 24, 2014 6:00 AM • BY THE EDITORIAL BOARD

Opinions are mixed on whether students would benefit if St. Louis' lowest-performing schools were run by nonprofit groups.

Even without conclusive evidence, Superintendent Kelvin Adams' proposal to seek outside help is a sign of the urgency he feels to improve education for students in the district and his willingness to try new methods.

He should be commended for looking for ways to help kids who are struggling and for acknowledging that the same old methods are not working.

Large urban school districts around the nation increasingly are handing over control of chronically low-performing schools to nonprofit agencies, says Michael Casserly, executive director of the Council of the Great City Schools.

Mr. Casserly said Friday that the turnaround strategy is still relatively new and there is not much data available to evaluate it. His organization has a study underway to analyze the practice. Mr. Casserly said it is becoming more unusual for an urban district to operate its own lowest-achieving schools than for an outside vendor to do so.

"It doesn't always work. There are prominent examples where it does not work," he noted, adding that it is being tried in such urban school districts as Boston, Washington, Philadelphia, Chicago, New York and Newark, N.J.

"It's better than mixed," Mr. Casserly said of reviews on the strategy. "There is some evidence to show it does work."

He said he would not characterize Mr. Adams' proposal as a desperate move, which is what some critics have suggested it looks like.

"I would characterize is as commitment to those children in those schools to make sure they get the highest quality education," Mr. Casserly said.

One of the more recent places where the strategy is going to be put to use is in Massachusetts. State education officials have selected three nonprofit agencies and a superintendent — all with good records for boosting student achievement — to take over control of four schools in Boston, Holyoke and New Bedford.

This marks the first time that the state will take control of individual schools within a district, a power granted under a 2010 law. The takeovers will begin in the summer.

As the Post-Dispatch's Elisa Crouch has reported, Mr. Adams has proposed hiring outside vendors to operate 18 schools if they fail to meet specified academic targets next year. The vendors would run them beginning in the 2015-16 school year.

Mr. Adams told the district's state-appointed Special Administrative Board that the operators could be charter schools, or an educator or a firm with a proven record of school turnaround work, as long as they were nonprofits.

He said the district is releasing a request for proposals but that it could be weeks or months before contracts are signed.

The tactic is being tried because of poor scores on state standardized exams last year. Those scores followed several years of improvements, but under the state's new performance measures, the latest scores were enough to put the city's schools in danger again of losing accreditation in two years.

Mr. Adams also plans to shift staff and resources so students in the struggling schools will get more intense tutoring and support. Those schools — and the 6,300 children in them — came under the direct supervision of Mr. Adams last fall.

The superintendent has proposed shifting \$6.4 million to them next year to provide more in-school tutoring, additional teacher training, to hire more reading and math specialists, and more social workers and counselors.

All of these are good steps by Mr. Adams, but the public shouldn't expect miracles. The reality is that 97 percent of the students in the district's lowest-performing schools live in poverty. They come to school with intractable health and social issues that can overwhelm their ability to learn.

A study released Friday by the U.S. Department of Education's Office for Civil Rights found a pattern of unequal educational benefits split along racial lines. The study is the first analysis of data from all of the nation's 97,000 public schools in nearly 15 years.

It shows that minority students are more likely than their white peers to be suspended from school, and that the pattern starts in preschool. They also have access to fewer rigorous math and science classes and are taught by less experienced and lower-paid teachers than white students.

Sixty years after Brown v. Board of Education is too many decades gone since the country promised every student a right to equal education. Achieving that equality has been and will continue to be an uphill battle, but it must be continued, by any means necessary. Too many generations have been lost.

OP-EDS

Charlotte Observer

Charlotte-Mecklenburg Schools is a proven leader

By Michael Casserly Special to the Observerth Posted: Friday, Apr. 18, 2014

While Charlotte's school children are on spring break this week, parents might want to take a moment now that the brutal winter has come to an end to reflect on the increasingly sunny picture of public education in their city. Recent news stories about Charlotte's public schools tell of falling dropout rates, decreasing crime and new community investments in local schools. The district also boasts some of the highest levels of student achievement among big city school systems across the country.er

In fact, the latest results of the rigorous National Assessment of Educational Progress (NAEP) – the Nation's Report Card – once again showed Charlotte-Mecklenburg Schools at the head of the pack among major school systems nationwide. At both the fourth- and eighth-grade levels, more students scored at or above proficient in reading and math in Charlotte than across the state, the nation and other large cities.

Students eligible for a free or reduced-price lunch scored higher, on average, than their counterparts in other large cities and across the state and nation in fourth-grade reading and math, and African American students in Charlotte outscored their counterparts in reading and math at both the fourth- and eighth-grade levels.

Compared to other big city school districts across the nation, Charlotte also has a higher percentage of English language learners scoring at or above proficient in these core subjects, and a lower percentage scoring below basic in fourth- and eighth- grade math and eighth-grade reading.

In fact, as the overall numbers of Charlotte's students scoring at or above proficient levels has risen, the numbers performing below basic levels of attainment has dropped significantly across the board.

What's more, 10 years of NAEP data show that Charlotte can not only sustain this high level of academic achievement, but it can build upon it as well. Since CMS started administering the NAEP Trial Urban District Assessment in 2003, it has grown five points in fourth-grade math, 10 points in eighth-grade math, seven points in fourth-grade reading, and four points in eighth-grade reading – growth that either meets or exceeds the gains of other school districts across the country.

Of course, CMS still has much work to do. While average scale scores have risen among nearly all student groups over the past decade, the achievement gaps between African American and white students, ELLs and native speakers, and advantaged and disadvantaged students remain large – an enduring challenge Charlotte shares with schools across the country.

In response, the school system is moving aggressively to narrow these disparities and to boost academic attainment for all students. It has established a bold community-outreach plan, initiated efforts to boost graduation rates – already at an all-time high, pursued innovative strategies to turn around low-performing schools, increased participation in advanced placement courses, and improved services.

Sometimes members of the community look longingly at reforms in other major cities and ask why Charlotte can't be like them. Charlotte can certainly learn from other communities, but the truth is that those cities are often looking at Charlotte and wishing they could be more like you.

As it works to further improve the quality of instruction and implement higher college and career-ready standards, CMS can certainly learn from the successes and challenges faced by other school districts. But with its record of high achievement and sustained growth, and with school leadership, staff, principals, and teachers that are the envy of school systems large and small across the country, the district is in a strong position to maintain its forward momentum.

So as spring brings an end to the dark, cold days of winter, it is a good time to refresh some of the outdated notions of big city public schools. For Charlotte's school children, the future is certainly looking brighter.

Michael Casserly is the executive director of the Council of the Great City Schools, the nation's primary coalition of large urban school systems.

Milwaukee Journal Sentinel Lessons from elsewhere on education

By Michael Casserly March 29, 2014

America's urban schools are under more pressure to improve than any other institution — public or private — in the nation. However, there is mounting evidence that the aggressive reform efforts of these urban school systems are beginning to pay off.

Results from the National Assessment of Educational Progress (NAEP) indicate that, although big-city schools continue to lag behind national averages for the most part, large-city schools made statistically significant gains in both reading and mathematics at the fourth- and eighth-grade levels between 2003 and 2013. Moreover, urban systems are outpacing the nation in their rate of growth, a pattern also seen in results from the 2013 NAEP testing.

The <u>Council of the Great City Schools</u> and the <u>American Institutes for Research</u> sought to examine these patterns — as well as the factors that might be driving urban district improvements — in greater detail. We selected four districts for intensive study — one district with consistently high overall performance (Charlotte-Mecklenburg), one district showing significant and consistent improvements in reading (Atlanta) and one that showed such improvements in mathematics (Boston), as well as one district that lacked such improvement (Cleveland). The overarching goal was to identify variables that might be contributing to improvement in urban education across the nation and to explore what might be needed to accelerate those gains.

First, we examined the level of alignment between NAEP frameworks and state (and, where applicable, district) standards in reading, math and science. We then looked for a connection between a district's relative degree of alignment in a specific subject and its performance on the tamper-proof NAEP.

The results of this analysis revealed that there was no apparent relationship between student performance or gains on NAEP and the degree of content alignment with NAEP. Some districts made significant improvements on NAEP even when their state standards were not well-aligned with NAEP. Conversely, high alignment did not guarantee better results or more gains.

What did appear to drive a school system's ability to improve on NAEP was a comprehensive set of instructional and management policies and practices that Milwaukee might learn from. Specifically, there were a number of features common among improving and high-performing districts. All three districts benefited from skillful, consistent and sustained leadership and a focus on instruction. These leadership teams were unified in their vision for improved student achievement, setting clear, systemwide goals and creating a culture of accountability for meeting those goals.

While they did not necessarily employ common programs or materials districtwide, there was a clear, uniform definition of what good teaching and learning would look like. That vision was communicated throughout the district, and a strategy for supporting high-quality instruction and program implementation through tailored, focused and sustained professional development was aggressively pursued. And each of the districts used assessment data to monitor progress and to help drive these implementation and support strategies, ensuring that instructional reforms reached every school and every student.

Importantly, these common themes seemed to work in tandem: Each factor was critical, but it is unlikely that, taken in isolation, any one of these positive steps could have resulted in higher student achievement.

The findings of this study have some important implications, particularly for districts such as Milwaukee that are working to implement the new Common Core State Standards. Many educators — and the public in general — assume that putting into place more demanding standards alone will result in better student achievement.

This study, however, suggests that the higher rigor embedded in the new standards is likely to be squandered, with little effect on student achievement, if implementation is not approached in a thoughtful, deliberate way and if the content of the curriculum, instructional materials, professional development and classroom instruction are not high-quality, integrated and consistent with the standards.

Michael Casserly is executive director of the <u>Council of the Great City Schools</u> and will speak at a conference at Marquette University Law School Tuesday titled <u>"Lessons from Elsewhere."</u> For information, go to <u>law.marquette.edu/current-students/lessons-elsewhere</u>

STATEMENTS	



Statement by Michael Casserly, Executive Director Council of the Great City Schools On

Education Secretary Arne Duncan's Announcement on Testing

August 21, 2014

The Council of the Great City Schools, the nation's primary coalition of large urban school systems, strongly supports U.S. Secretary of Education Arne Duncan's announcement today granting additional flexibility for those who want it on the application of state test data to teacher and principal evaluations.

States and big-city school districts are working hard to implement significant changes in standards, assessments, and evaluations that are taking place nationwide, and additional time to implement those changes and reforms effectively is welcome. Many jurisdictions will need this added flexibility that the Administration offered today; others will not, but it is important that schools have the option to request what they most need to be effective.

In addition, the assurances that the Department of Education provides are important ones: states and local school districts will be required to calculate student growth based on state assessments during the transition year, and teachers and principals will need to receive these data specifying the results. These are reasonable and thoughtful assurances and will help educators better familiarize themselves with both the new assessments and learn from the results they generate about how we can better teach our childen.

Finally, the Council supports additional flexibility beyond the base year for states and school districts that need and request it.

American public education is undergoing substantial revisions and improvements, and it is important that federal, state, and local authorities learn from each other about what works and doesn't work in this important period of transition. The Secretary's statement today reflects this need for mutual support, while keeping squarely in mind the need to improve the academic attainment of our students across the country and to remain responsible and accountable for the academic well-being of our students.

In that spirit, the Council of the Great City Schools has collected an unprecedented volume of data on the assessment practices of the nation's big-city school systems to help intelligently inform issues of testing, its purposes and uses, and how these practices can be improved as we move forward. Results of this work will be forthcoming in the weeks ahead.

Again, the Council applauds the Administration for the steps it announced today offering additional flexibility to schools across the country as they continue to reform and improve.



Statement by Michael Casserly, Executive Director Council of the Great City Schools On DCPS Decision on Teacher Evaluations

June 20, 2014

The Council of the Great City Schools applauds the decision by leaders of the District of Columbia Public Schools (DCPS) to delay by one year the use of new test scores from the Partnership for Assessment of Readiness for College and Careers (PARCC) to evaluate its teachers.

The PARCC assessments are part of the school system's larger efforts to improve instruction for students citywide. These new tests will be given for the first time in the spring of 2015 and reflect the Common Core State Standards that the school system is putting into place.

These assessments are different from those that students have taken before. Students will be asked to demonstrate and apply what they have learned in ways that are fundamentally different from what was expected in the past. In addition, they will be asked to write out their answers and justify their thinking well beyond what is required in traditional multiple choice tests. This means that teachers will be changing their instructional practices profoundly over the next several years.

Moreover, the new tests will be administered mostly online and will be longer than many students are used to. This will involve significant challenges to the school system and its administrators and teachers in terms of technology equipment, broadband capacity, student and teacher scheduling, professional development, logistics, and other issues.

The PARCC assessment has been piloted nationwide and is beginning to provide valuable lessons on what students, teachers, and school systems should expect, but this sample testing will be nothing like implementing the new tests throughout the district. Both the school system and its teachers therefore need a little extra time to implement both the standards and their assessments properly.

DCPS is being thoughtful, prudent, and balanced in its decision to delay personnel evaluations based in part on the assessments while district staff and teachers learn how the new tests will work and what instructional and administrative changes will be necessary.

For its part, the public should know that DCPS has been one of the most aggressive in the country at implementing these new and more rigorous standards, preparing its teaching force for the changes, and improving opportunity for all its students. Our children will continue to be the district's priority and the beneficiaries of these critical reforms.

COMMON CORE COMMUNICATIONS





Client: Council of the Great City Schools 100282

Project: Common Core State Standards Video Script

Date/Ver: September 11, 2014

Format: 3:00 video

Title: "Conversation" (aka Why Common Core)

Voiceover talent notes:

For the adult voiceover, we recommend going with a female, age 35-45, whose voice can sound, by turns, authoritative and approachable, portraying a teacher. While she does get taken aback at the child's interjections, she never gets irritated (e.g., Gabrielle Union, Zoe Saldana, Julia Roberts).

For the child voiceover, we recommend a boy, age 8-10, who sounds endearing and curious without coming across as too cute or saccharine.

VISUALS AUDIO

A hand slides across an abacus to a calculator, then the camera pulls out to show that they were both on a tablet screen.

Adult VO (in a buttoned-up teacher tone: nurturing but authoritative): We live in the age of high-speed information and our children's education needs to keep up. We all need the Common Core State Standards to make sure that students are prepared for college and the real world -

As the child's voice interrupts, suddenly the conveyor belt stops and all the objects bunch up and fall off.

Child VO (interrupting): Why?

Adult VO (taken aback, as if trying to figure out what just happened. She snaps out of announcer mode and sounds warmer, more friendly): Oh, hey there. Uh, why what?

Child VO: Why do I have to prepare? Isn't this the real world now? (pauses) By the way, I'm Eddie.

Adult VO (warmly, as if moving from official



A makeshift time machine made of cardboard sputters around the screen.

talking about the future.

Eddie VO (Making his own childish leap of

imagination): I wanna invent a time machine!

announcer mode to teacher mode): Well hi, Eddie. You're right – it is the real world. But I'm

Adult VO (Laughs a little, warming to Eddie): Cool! If you used your time machine to go to the future, what would you see?

Eddie VO: Robots. That clean my room.

We see a small army of robots cleaning up an incredibly messy kid's room, with a boy supervising.

We then yank the entire scene away from the boy, and replace it with college.

When Eddie asks why, the boy looks out at the screen quizzically.

A bunch of complicated physics formulas fill the screen, with retro time machines and dinosaurs.

A hand builds a staircase out of blocks.

When Eddie asks why, the last block tumbles backwards and the hand stops building for a moment.

Hand resumes building as the teacher continues.

Adult VO: Awesome.

But you'll need more than high school classes to learn how to build that time machine ...or robots.

Eddie VO: Why?

Adult VO: (Bemused, almost thinking aloud to herself in a way Eddie can't understand yet)
Well, you'd have to accelerate to the speed of light...

Eddie VO: Umm, that sounds kinda hard.

Adult VO: *(Encouraging)* See, the new Standards prepare you for taking on hard things...one step at a time. It helps to think of them like a staircase –

Eddie VO: Why?

Adult VO: Because the Standards are like steps that take you closer to your college or career, while teachers like me make sure you really get a topic before you take a "step up." And, that staircase is the same no matter



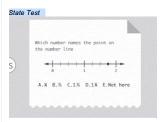
	where you live. So even if you move, your <i>new</i> teachers know what step you're on.
	Eddie VO: I'm MOVING?
	Adult VO: Oh, no! That's only IF you move. It helps keep everything fairfor everyone.
	Eddie VO: Fair(ness) is good.
	Adult VO: I think so, too. Your teachers will also now have more flexibility to help you really understand critical ideas.
We see a multiple books change into one book with a	Eddie VO: Why?
ton more pages.	Adult VO: Well, the Standards make sure you're really exercising your brain when learning things like fractions or reading and writing about books by famous authors.
A giant peach rolls over the books.	Eddie VO: I'm reading James and the Giant Peach.
A spider drops into view and weave a web. The giant peach falls into the spider, obscuring it. Suddenly the legs pop out as if the peach has sprouted legs and is now crawling back and forth. A detective character with a magnifying glass inspects a page from a book and pulls a set of keys out from	Adult VO: And while you read that, a student in another school may be reading <i>Charlotte's Web.</i> But you'll <i>both</i> be learning to read carefully, looking for clues like a detective.
the pages.	Eddie VO (excited): I'm a good detective! I can always find my mom's keys really fast.
	Adult VO (laughs): I'll bet you are! I bet you'll be good at meeting these Standards, too. And we can measure your growth better along the way to find out.
	Eddie VO: I'm about 4 feet tall.



A big Godzilla monster made of test questions stomps around the screen...

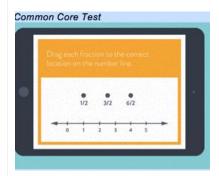
...but suddenly transforms into a fairly cute looking laptop computer.

We see a search box appear on the computer screen. The words "State vs. Common Core question" are typed into the box. The arrow clicks on a search result (the search results don't have to be legible).



A hand (either real or illustrated) scribes the state multiple-choice question.

The same hand scribes the Common Core question. As Eddie attempts to answer the question, it's as if he's taken the mouse over (we see a cursor move onto the screen). The cursor drags the "3/2" halfway between 1 and 2 on the number line.



We see an owl's huge eyes staring at camera.

Adult VO (with a short giggle): That's one kind of measurement – but I'm talking about tests.

Eddie VO: Eew, I don't like tests.

Adult VO (Understanding tone): You're not the only one, Eddie. But the new tests are just replacing the ones you already take— with questions that show us whether you really understand things...like fractions.

[sounds of typing]

Here. Take this multiple-choice question—it's the kind you're used to seeing. You could guess and still have a 1 in 5 chance of getting it right. Heck, your cat has a 1 in 5 chance of getting it right.

Eddie VO: My cat can't do math!

Adult VO (laughs): Now check out this new kind of question.

Eddie VO (eager): Oh-oh—can I try?

Adult VO: Sure.

Eddie VO: Hm, three-halves equals...one and one-half. [tentative] That's...here?

Adult VO: Nice! You got that even though the answer wasn't staring you in the face.

Eddie VO (knowingly): Staring's rude anyway.



A brain scratches its "head," or lifts weights. We see the time machine again, this time looking more professionally built, as a kid enters it and takes off.	Adult VO: (she laughs) Eddie VO (skeptical): Waitdoes this mean I'm gonna have to do more of that brain exercise? Adult VO: Yes. But if we work together, and we're patient, students like you will develop the skills to be amazing inventors someday.
	Eddie VO: Yeah, my mom says it's important to be patient . Adult VO (laughs): Your mom's a smart woman, Eddie.
Super: [logo] [URL]	



Common Core Research – Key Findings

An Online Survey among Parents in Council of Great City Schools Districts

August 2014

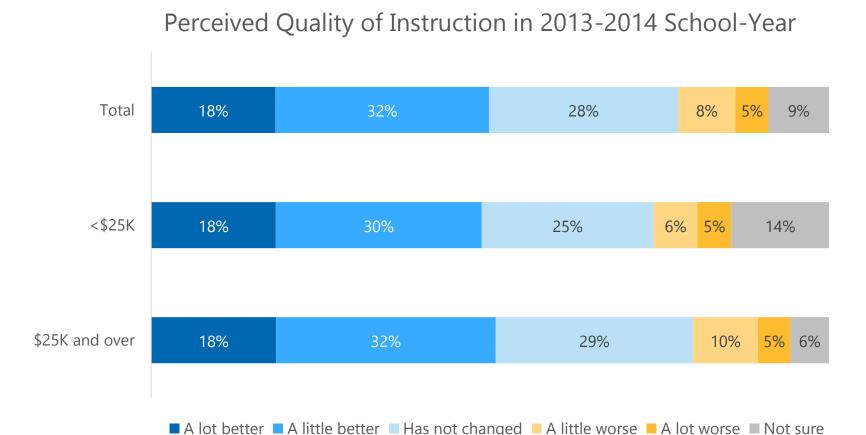
Objectives and Methodology



- The Council of Great City Schools had an interest in testing potential Common Core education standards messaging among parents of K-12 students in many of the districts they represent.
- The Council also wanted to gauge benchmark perceptions of the Common Core.
- An online survey was conducted among 660 respondents.
 - Among these respondents, 200 have household incomes less than \$25,000/yr.
- The survey sample is reflective of the Council's regional distribution and included a mix of Caucasian, African-American, and English-speaking Hispanic respondents, as well as other races and ethnicities.

Half of Council parents believe school instruction improved in the 2013-2014 school year

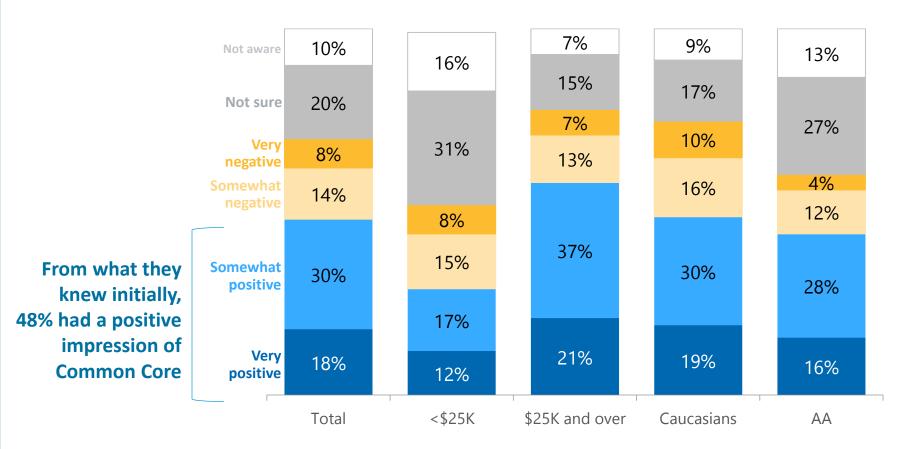




Initially, impressions are generally positive with a significant number of unsure or unaware parents

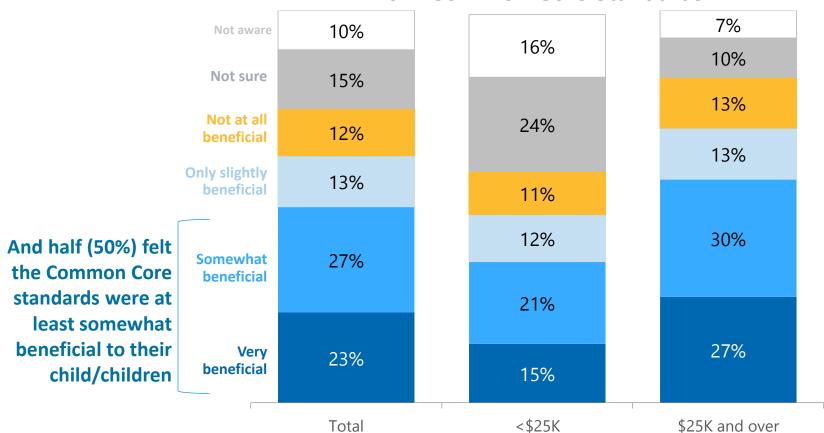


Impressions of Common Core



A similar pattern exists when looking at EDGE research the perceived benefits

Perceived Level of Benefit from Common Core Standards



Parents clearly see the importance of Common Core standards after reading the "basic" definition

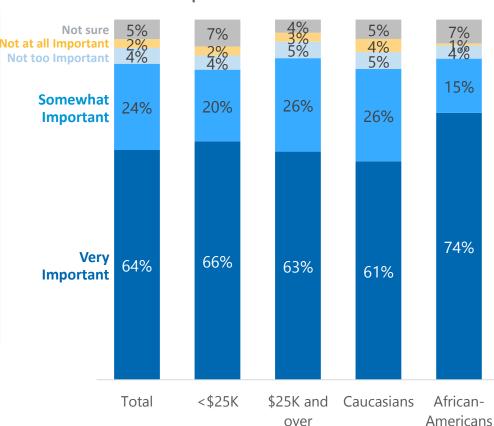


<u>Information Provided to Gauge</u> <u>Importance of Common Core Standards</u>

Here's a little more information about the Common Core.

The Common Core is a new set of highquality academic standards in mathematics and English language arts/literacy (ELA). These learning goals outline what a student should know and be able to do at the end of each grade. The standards were created to ensure that all students graduate from high school with the skills and knowledge necessary to succeed in college, career, and life, regardless of where they live.

Importance of Standards



Demographic Profile







Northeast: 20%

South: 28%

Midwest: 22%

West: 30%



60%

32%

40%

6th - 8th 9th - 12th



201

Respondents have income less than \$25,000 a year 439

Respondents have income of \$25,000 a year or greater

Race/Ethnicity

62%

White/ Caucasian 25%

African-American 8%

Asian/ Pacific Islander 15%

Englishspeaking Hispanic respondents





39%

College grad+ Some college, no degree





Age

30%

25-34

31%

35-44

24%

45-54





12%

Part-time Homemakers

16%

Parents Support the Common Core, Despite the Drama By Michael Casserly, Executive Director Council of the Great City Schools

Back-to-school time is a season of routines, as parents, students, and teachers alike readjust to setting the alarm clock a little earlier, checking to make sure homework is done, and packing lunch. But this year will be different in significant ways, as schools across the country—including those in many of the Council of the Great City Schools' (CGCS) 67 member districts—move to full implementation of more rigorous Common Core Standards and aligned assessments.

These are not small changes, but too often their approach has been treated by the political world and the media as a soap opera, replete with dramatic plot twists, outsized heroes and villains, and always the promise of more drama. To cut through the noise, we recently conducted a survey of parents in Council districts where Common Core is being implemented, to gauge their understanding of and attitudes toward these new standards. And the good (if not surprising) news is that parents are very good at distinguishing between manufactured drama and what's really important.

To establish a baseline, we asked parents how they felt about the quality of school instruction during the 2013-14 school year, and half (50%) reported feeling that instruction had improved at their child's school. This finding aligned with the half of parents (50%) who reported feeling that the Common Core standards are at least somewhat beneficial to their child or children (compared to 13% who thought the standards were only slightly beneficial, and 12% who thought they were not be beneficial at all).

We also asked parents who had heard at least "a little" about the standards for their impressions, without providing them any additional information. We were pleased to find that despite all of the misinformation and overheated rhetoric, more parents (48%) had a positive impression of the standards than a negative one (22%), while a significant percentage of parents still reported being unsure or unaware (30%) of the standards.

Most encouraging in this survey was how positively parents responded to being given a straightforward description of the standards;

The Common Core is a new set of high-quality academic standards in mathematics and English language arts/literacy (ELA). These learning goals outline what a student should know and be able to do at the end of each grade. The standards were created to ensure that all students graduate from high school with the skills and knowledge necessary to succeed in college, career, and life, regardless of where they live.

After reading the description, parents overwhelmingly (88%) said that the standards were either "somewhat" or "very" important for their child's education.

Taken together, these findings are convincing evidence that at this early stage, the Common Core is neither a runaway hit with parents, nor teetering on the edge of collapse for lack of parental support.

What they do show, first of all, is that one of two parents surveyed feel that the quality of instruction in their child's classroom is already improving, and that one in two parents surveyed also feel their child or children are already benefitting from the Common Core.

But parents clearly need more information. When nearly forty percent of parents report feeling unsure about or unaware of the standards, it's a clear signal that more work remains. Some of that work is easy, as demonstrated by the effect of simply describing what the Common Core is and how these standards are intended to improve students' preparation for college, career, and life.

But as Common Core implementation progresses, it's critical that we continue to provide parents with even more detail, which is why the Council of the Great City Schools has also created "Parent Roadmaps" for <u>English Language Arts</u> and <u>Mathematics</u> that guide parents through what their children should be learning at each grade level.

Our work doesn't end there. To ensure parents understand the important changes underway, we've got to surround them with accessible information that answers questions, addresses concerns, and paints a clear picture of why the Common Core is good for their children. The Council will have more to share in this vein soon, and in the meantime, I encourage everyone reading this to share these survey results – I find them far more interesting than a soap opera.

The online survey was conducted by Edge Research and was fielded from August 1-8, 2014. The sample included parents whose children attend K-12 schools in Great City School districts implementing the Common Core. The final sample included 660 respondents (200 of whom had household incomes of less than \$25,000/year).

memorandum



To: Henry Duvall, Council of the Great City Schools

From: GMMB

Date: July 15, 2014

RE: Common Core PSA Monitoring Report for June 1, 2014 – June 30, 2014

Overall

This monitoring report represents the monthly summary of the results of the PSA distribution for the Council's Common Core English and Spanish television PSA, "Staircase," and English and Spanish radio PSA, "Future," covering the period between June 1 and June 30.

Since the beginning of the PSA campaign on December 20, 2012, there have been a total of 30,543 airings across all PSAs, resulting in 238,525,094 monitored television and radio impressions, where an impression is equivalent to a single person seeing or hearing the PSAs. These impressions represent a total estimated ad value of \$5,191,362.

All data in this report comes from coding embedded in the PSA tapes distributed to television and radio stations that is subsequently tracked and reported by Nielsen Media Research.

Below is a summary of cumulative airings since the beginning of the campaign across the four PSAs. A breakdown of airings of the television PSA by market and station is available in the Appendix.

PSA	Cumulative Airings	Cumulative Audience Impressions	Cumulative Media Value	Placements in Top 15 Markets This Month
English TV PSA	4,901	125,732,576	\$2,603,539	
				Los Angeles, Dallas-Fort Worth,
Spanish TV PSA	8,654	65,374,368	\$1,628,574	Boston, Houston
English Radio				
PSA	14,474	35,414,750	\$794,020	Dallas-Fort Worth, Boston, Houston
Spanish Radio				
PSA	2,514	12,003,400	\$165,229	New York
Total	30,543	238,525,094	\$5,191,362	



English Television

For the month of June, the English television PSA received 13 airings on four stations in four markets, amounting to 109,165 audience impressions and \$2,310 in donated media values.

For the month of June, the English television PSA ranked number 1,078 out of 1,430 PSAs tracked by Nielsen Media Research.

New markets reached this month	No new markets or stations reached this month.
Stations with over 500,000 impressions this month	No stations with over 500,000 impressions this month.
Cumulative percentage of	29% during Late Night hours (1 AM – 5 AM)
airings by daypart	24% during Daytime hours (9 AM – 4 PM)
	22% during Early Morning hours (5 AM – 9 AM)
	11% during Late Evening hours (10 PM – 1 AM)
	10% during Early Fringe hours (4 PM – 8 PM)
	5% during Primetime hours (8 PM – 10 PM)
Cumulative demographic	Women aged 25-54: 30,953,830 impressions, or 25% overall
reach	Men aged 25-54: 22,050,692 impressions, or 18% overall

Spanish Television

For the month of June, the Spanish television PSA received 289 airings on 12 stations in seven markets, amounting to 2,166,932 audience impressions and \$63,014 in donated media values.

For the month of June, the Spanish television PSA ranked number 346 out of 1,430 PSAs tracked by Nielsen Media Research.

New markets reached this	No new markets or stations reached this month.
month	
Stations with over 100,000	KBNT-TV (San Diego): 59 airings and 651,403 impressions
impressions this month	WUNI-TV (Boston): 45 airings and 407,457 impressions
	WUVN-TV (Boston): 89 airings and 393,401 impressions
	XHAS-TV (San Diego): 7 airings and 336,000 impressions
	KQDF-TV (Dallas-Fort Worth): 32 airings and 181,168 impressions
Cumulative percentage of	26% during Late Night hours (1 AM – 5 AM)
airings by daypart	21% during Early Morning hours (5 AM – 9 AM)
	20% during Daytime hours (9 AM – 4 PM)
	15% during Late Evening hours (10 PM – 1 AM)
	13% during Early Fringe hours (4 PM – 8 PM)
	5% during Primetime hours (8 PM – 10 PM)
Cumulative demographic	Women aged 25-54: 17,916,339 impressions, or 27% overall
reach	Men aged 25-54: 12,067,531 impressions, or 18% overall



English Radio

For the month of June, the English radio PSA was aired 1,741 times on 21 stations in 16 markets, amounting to 2,018,600 audience impressions and \$81,216 in donated media values.

New markets reached this	1 market: Cedar Rapids, IA
month	
Stations with over 100,000	KCRR-FM (Cedar Rapids, IA): 364 airings and 800,800 impressions
impressions this month	KNBY-AM (Little Rock, AR): 482 airings and 385,600 impressions
	KOKR-FM (Little Rock, AR): 482 airings and 385,600 impressions
	WASC-AM (Greeneville, SC-Asheville, NC): 124 airings and 105,400
	impressions
	KFEQ-AM (St. Joseph, MO): 135 airings and 105,200 impressions
Cumulative demographic	Women aged 25-54: 4,997,700 impressions, or 14% overall
reach	Men aged 25-54: 7,798,600 impressions, or 22% overall

Spanish Radio

For the month of June, the Spanish radio PSA was aired 188 times on seven stations in six markets, amounting to 268,900 audience impressions and \$10,232 in donated media values.

New markets reached this month	No new markets or stations reached this month.
Stations with over 50,000	WDDW-FM (Milwaukee): 50 airings and 70,000 impressions
impressions this month	KGRB-FM (Sacramento: 17 airings and 57,800 impressions
Cumulative demographic	Women aged 25-54: 3,234,600 impressions, or 27% overall
reach	Men aged 25-54: 4,931,400 impressions, or 41% overall

Summary Analysis

The English and Spanish radio PSAs saw strong performance this month. The English radio PSA in particular saw significant increases across all metrics this month, receiving 1,741 airings, 2,018,600 audience impressions, and \$81,216 in donated media values. This performance was a very favorable jump from the 287 airings, 436,850 audience impressions, and \$13,547 in donated media values that it received in May. Similarly, the Spanish radio PSA aired 188 times, resulting in 268,900 audience impressions and \$10,232 in donated media values, compared to 160 airings, 225,700 audience impressions and \$8,681 in donated media values in May.

The Spanish television PSA maintained its reach to a wide audience despite a significant decrease in the number of airings from last month. In June, the Spanish television PSA received 289 airings, amounting to 2,166,932 audience impressions and \$63,014 in donated media values, compared to 364 airings, 2,555,393 audience impressions, and \$73,538 in donated media values in May.

In June, 99 percent of all television PSA airings took place in the top 50 markets. Over the life of the full PSA campaign, 29 percent of all English television PSA airings took place in top 25 markets,

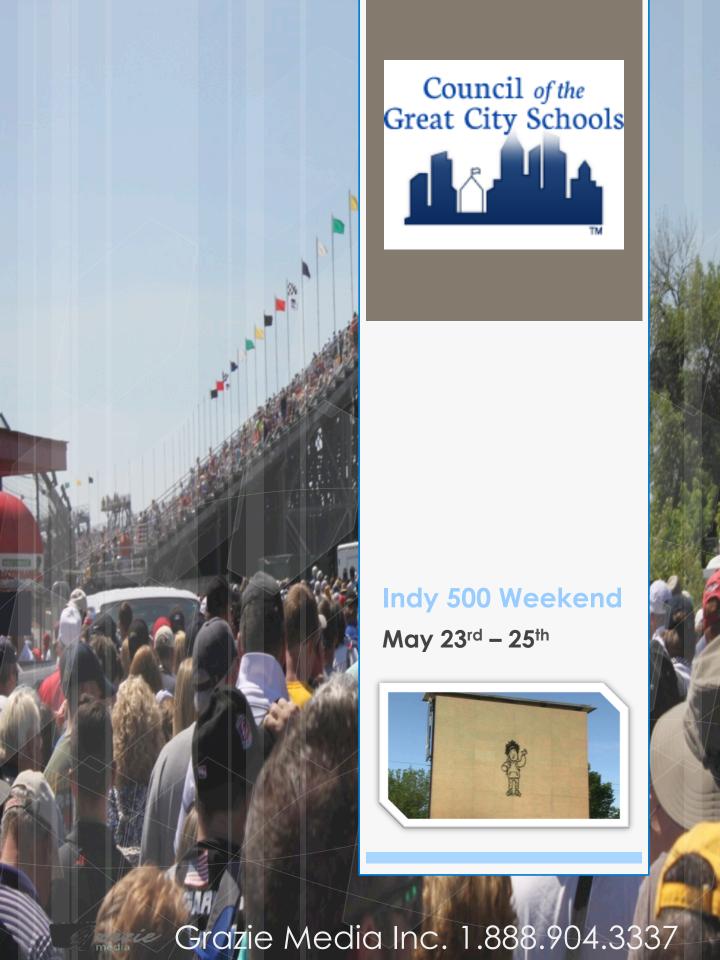


outperforming the 2013 average for all PSAs aired during the year (27 percent of airings in the top 25 markets). Similarly, 66 percent of all the Spanish television PSA airings occurred in the top 10 markets (compared to the 2013 average of 12 percent of airings occurring in the top 10 markets).

English Television P	SA: Station Airing Detail (Decem	ber 20, 2012 - June 30), 2014)						
				Airings	Audience			Total	
				This	Impressions	Media Value	Total	Audience	Total Media
Station	Affiliation	City	State	Month	This Month	This Month	Airings	Impressions	Value
Chicago, IL (#3 DMA									
	Fox Broadcasting Company	Chicago	IL	-	-	\$0	40	729,025	\$25,309
	MyNetwork TV	Chicago	IL	-	-	\$0	41	821,723	\$24,201
Subtotal:	141			-	-	\$0	81	1,550,748	\$49,510
Boston, MA (#7 DM WWDP-TV	NBC Television Network	West Bridgewater	MA	-	-	\$0	17	81.009	\$2,125
Subtotal:	NBC Television Network	west bridgewater	IVIA	-		\$0 \$0	17	81,009	\$2,125
Washington, D.C. (#	#8 DMA)					30	1,	61,005	72,123
_ , ,	Independent	Chambersburg	PA	-	-	\$0	27	122,422	\$3,846
Subtotal:				-	-	\$0	27	122,422	\$3,846
Cleveland, OH (#18	DMA)								
WDLI-TV	Trinity Broadcasting Network	Akron	ОН	-	-	\$0	19	39,394	\$2,185
WEAO-TV	PBS	Kent	ОН	-	-	\$0	3	7,314	\$345
WKYC-TV	NBC Television Network	Cleveland	ОН	-	-	\$0	646	41,107,769	\$953,658
Subtotal:				-	-	\$0	668	41,154,477	\$956,188
St. Louis, MO (# 21		a							4
	NBC Television Network	St. Louis	MO	-	-	\$0	286	22,382,314	\$461,239
Subtotal:	DAAA			-	-	\$0	286	22,382,314	\$461,239
Pittsburgh, PA (#23 WBGN-TV	DMA) Independent	Dittchurgh	DΛ			ćo	255	601.060	¢21 274
WBGN-TV Subtotal:	muepenuent	Pittsburgh	PA	-	-	\$0 \$0	255 255	601,960 601,960	\$31,274 \$31,274
Charlotte, NC (#25 I	OMA)			-	-	ŞU	255	001,900	331,274
	Independent	Charlotte	NC	-	_	\$0	10	19,341	\$1,150
	ABC Television Network	Charlotte	NC	-	_	\$0	52	2,716,135	\$47,372
Subtotal:			1	-	-	\$0	62	2,735,476	\$48,522
Indianapolis, IN (#2	6 DMA)					·			
	CW Television Network	Indianapolis	IN	-	-	\$0	253	396,835	\$25,300
WTTV-TV	CW Television Network	Indianapolis	IN	-	-	\$0	272	426,565	\$27,200
WXIN-TV	FOX Broadcasting Company	Indianapolis	IN	-	-	\$0	98	1,363,639	\$24,427
Subtotal:				-	-	\$0	623	2,187,039	\$76,927
San Diego, CA (#28	•								
	Fox Broadcasting Company	San Diego	CA	2	3,651	\$200	84	333,726	\$11,717
	MyNetwork TV	San Diego	CA	-	-	\$0	17	77,620	\$2,429
Subtotal:	20.4.6.3			2	3,651	\$200	101	411,346	\$14,146
Nashville, TN (#29 D WTVF-TV	CBS Television Network	Nashville	TN	-	-	\$0	445	29,782,429	\$412,488
Subtotal:	CD3 Television Network	IVASTIVITE	1110	_		\$0	445	29,782,429	\$412,488
Kansas City, MO (#3	31 DMA)					30	443	23,702,423	\$412,400
	Independent	Kansas	МО	-	-	\$0	50	127,784	\$5,141
Subtotal:			1	-	-	\$0	50	127,784	\$5,141
Columbus, OH (#32	DMA)								
i i	CBS Television Network	Columbus	ОН	-	-	\$0	101	4,699,528	\$82,237
WWHO-TV	CW Television Network	Columbus	ОН	4	5,453	\$400	52	78,992	\$5,200
Subtotal:				4	5,453	\$400	153	4,778,520	\$87,437
Cincinnati, OH (#35	· ·								
	CBS Television Network	Cincinnati	ОН	-	-	\$0	38	425,926	\$7,693
	Fox Broadcasting Company	Cincinnati	ОН	-	-	\$0	46	176,999	\$4,803
Subtotal:	(HAA DAAA)			-	-	\$0	84	602,925	\$12,496
Oklahoma City, OK		Oldah Sii	0''		00.100	4	40.	2 040 00	60
	ABC Television Network	Oklahoma City	OK	4	99,160	\$1,530	121	3,018,886	\$37,595
Subtotal: Birmingham, AL (#4	2 DMA)			4	99,160	\$1,530	121	3,018,886	\$37,595
	Independent	Tuscaloosa	AL	-	-	\$0	113	181,125	\$11,300
	Independent	Tuscaloosa	AL	-	-	\$0	109	172,074	\$11,300
Subtotal:			1	-	-	\$0	222	353,199	\$22,200
Memphis, TN (#49 [DMA)					30		200,233	7=2,200
	Trinity Broadcasting Network	Memphis	TN	-	-	\$0	12	10,740	\$1,200
	CW Television Network	Memphis	TN	-	-	\$0	54	636,958	\$10,087
	ABC Television Network	Memphis	TN	-	-	\$0	9	37,986	\$966
Subtotal:				-	-	\$0	75	685,684	\$12,253
New Orleans, LA (#5	51 DMA)								
		las of	LLA	-	-	\$0	349	12,466,665	\$240,695
WDSU-TV Subtotal:	NBC Television Network	New Orleans	LA			\$0	349	12,466,665	\$240,695

Wichita-Hutchinso	on, KS (#67 DMA)								
KSNC-TV	NBC Television Network	Great Bend	KS	-	-	\$0	241	180,066	\$21,690
KSNG-TV	NBC Television Network	Garden City	KS	-	-	\$0	300	234,092	\$27,000
KSNK-TV	NBC Television Network	Oberlin	KS	-	-	\$0	270	208,554	\$24,300
KSNW-TV	NBC Television Network	Wichita	KS	-	-	\$0	21	13,409	\$1,890
Subtotal:				-	-	\$0	832	636,121	\$74,880
Des Moines, IA (#7	72 DMA)								
KCCI-TV	CBS Television Network	Des Moines	IA	-	-	\$0	211	1,473,381	\$32,616
Subtotal:				-	-	\$0	211	1,473,381	\$32,616
Charleston, SC (#9	8 DMA)								
WCSC-TV	CBS Television Network	Charleston	SC	-	-	\$0	98	445,909	\$11,451
Subtotal:				-	-	\$0	98	445,909	\$11,451
Anchorage, AK (#1	45 DMA)								
KTUU-TV	NBC Television Network	Anchorage	AK	3	901	\$180	57	24,533	\$3,420
Subtotal:				3	901	\$180	57	24,533	\$3,420
Biloxi-Gulfport, M	S (#160 DMA)								
WXXV-TV	Fox Broadcasting Company	Gulfport	MS	-	-	\$0	43	53,443	\$3,113
Subtotal:				-	-	\$0	43	53,443	\$3,113
Jackson, TN (#175	DMA)								
WJKT-TV	Fox Broadcasting Company	Jackson	TN	-	-	\$0	41	56,306	\$3,977
Subtotal:				-	-	\$0	41	56,306	\$3,977
GRAND TOTAL:				13	109,165	\$2,310	4,901	125,732,576	\$2,603,539

Spanish Television	PSA: Station Airing Detail (Decen	nber 20, 2012 - May	31, 2014)						
		l i		Airings	Audience			Total	
				This	Impressions	Media Value	Total	Audience	Total Media
Station	Affiliation	City	State	Month	This Month	This Month	Airings	Impressions	Value
New York, NY (#1 E WBQM-TV	Independent	Union	NJ	-	_	\$0	48	879,487	\$29,480
Subtotal:	Independent	Official	143	-		\$0	48	879,487	\$29,480
Los Angeles, CA (#2	2 DMA)					Ţ		073,107	\$25) 100
KBEH-TV	Independent	Los Angeles	CA	2	21,196	\$884	75	755,639	\$18,715
KTTV-TV	FOX Broadcasting Company	Los Angeles	CA	-	-	\$0	2	296,852	\$22,706
Subtotal:	- 1			2	21,196	\$884	77	1,052,491	\$41,421
Chicago, IL (#3 DM	NBC Television Network,								
WSNS-TV	Telemundo	Chicago	IL	_	_	\$0	83	804.672	\$22,975
Subtotal:	reiemanas	Cincugo	1.2	-	_	\$0	83	804,672	\$22,975
Philadelphia, PA (#	4 DMA)					7-		55.75.2	722,010
WPSJ-TV	Independent	Winslow	NJ	-	-	\$0	25	119,361	\$3,232
WWSI-TV	Telemundo	Philadelphia	PA	-	-	\$0	1,033	10,183,104	\$241,834
Subtotal:	TV (#5 DA44)			-	-	\$0	1,058	10,302,465	\$245,066
Dallas-Forth Worth KAZD-TV	Independent	Dallas	TX	-		\$0	73	291,939	\$9,194
KFWD-TV	MundoFOX	Dallas	TX	5	18,627	\$658	113	491,155	\$14,764
KQDF-TV	Azteca America	Dallas	TX	32	181,168	\$5,088	422	2,391,418	\$65,978
KYDF-TV	Azteca America	Dallas	TX	-	-	\$0	1	3,963	\$150
WXAX-TV	Azteca America	Dallas	TX	-	-	\$0	22	135,314	\$4,653
Subtotal:				37	199,795	\$5,746	631	3,313,789	\$94,739
San Francisco, CA (-			40		277.250	445.040
KCNS-TV KDTV-TV	MundoFOX Univision Television	San Francisco San Francisco	CA CA	-	-	\$0 \$0	80 15	377,368 121,450	\$15,912 \$3,119
KFSF-TV	UniMas	San Francisco	CA	-	-	\$0	192	1,233,351	\$41,092
Subtotal:	Offitivias	Santituneisco	CA	-	_	\$0	287	1,732,169	\$60,123
Boston, MA (#7 DN	/A)							, , , , ,	,,,,,
WUNI-TV	Univision Television	Needham	MA	45	407,457	\$11,998	394	2,845,283	\$89,907
WUTF-TV	Telefutura Television Network	Needham	MA	12	60,225	\$1,750	307	1,510,022	\$50,284
WUVN-TV Subtotal:	Univision Television	Needham	MA	89 146	393,401	\$15,430 \$29,178	2,313	10,046,684	\$358,835 \$499,026
Washington, D.C. (#8 DMA)			146	861,083	\$29,178	3,014	14,401,989	\$499,026
WFDC-TV	Univision Television	Washington	DC	-	-	\$0	119	827,304	\$24,443
WMDO-TV	UniMas	Washington	DC	-	-	\$0	313	1,600,329	\$49,220
Subtotal:				-	-	\$0	432	2,427,633	\$73,663
Atlanta, GA (#9 DN	1								
WUVM-TV	Azteca America	Atlanta	GA	-	-	\$0	44	246,165	\$8,877
Subtotal: Houston, TX (#10 D	2044)			-	-	\$0	44	246,165	\$8,877
KYAZ-TV	Azteca America	Houston	TX	6	22,522	\$750	69	291,425	\$8,625
Subtotal:			1	6	22,522	\$750	69	291,425	\$8,625
Phoenix, AZ (#13 D	MA)								
KPDF-TV	Azteca America	Phoenix	AZ	-	-	\$0	121	473,272	\$16,632
KPHE-TV	Independent	Phoenix	AZ	-	-	\$0	1	7,858	\$474
Subtotal:	dele El IIIAC DAGA			-	-	\$0	122	481,130	\$17,106
WGEN-TV	Independent	Doral	FL	3	9,207	\$360	173	473,682	\$20,734
Subtotal:	muependent	Dorai	1.5	3	9,207	\$360 \$360	173	473,682	\$20,734
San Diego, CA (#28	DMA)				0,201	7000			720,101
KBNT-TV	Univision Television	San Diego	CA	59	651,403	\$22,069	1,045	10,682,676	\$330,906
KDTF-TV	UniMas	San Diego	CA	7	16,134	\$830	289	623,749	\$30,952
XHAS-TV	Telemundo	San Diego	CA	7	336,000	\$700	323	15,504,000	\$32,300
Subtotal: Hartford-New Have	on CT (#20 DMA)			73	1,003,537	\$23,599	1,657	26,810,425	\$394,158
WUTH-TV	UniMas	Hartford	СТ	22	49,592	\$2,497	709	1,350,891	\$76,234
Subtotal:				22	49,592	\$2,497	709	1,350,891	\$76,234
San Antonio, TX (#	36 DMA)								
KVDF-TV	Azteca America	San Antonio	TX	-	-	\$0	14	27,440	\$1,400
Subtotal:				-	-	\$0	14	27,440	\$1,400
Austin, TX (#40 DN		A	T1/						4
KADF-TV Subtotal:	Azteca America	Austin	TX	-	-	\$0 \$0	2 2	2,205 2,205	\$200 \$200
Las Vegas, NV (#42	DMA)					,3U		2,205	3200
KHDF-TV	Azteca America	Henderson	NV	-	-	\$0	61	102,541	\$6,159
Subtotal:			1	-	-	\$0	61	102,541	\$6,159
Alberquerque, NM	(#47 DMA)								
KLUZ-TV	Univision Television	Alberquerque	NM	-	-	\$0	9	14,954	\$900
KTFQ-TV	UniMas	Alberquerque	NM	-	-	\$0	22	28,712	\$2,200
			\perp	-	-	\$0	31	43,666	\$3,100
Subtotal:	\A/\/ (#160 PR4A)								
Clarksburg-Westor	· · · · · · · · · · · · · · · · · · ·	Bridgeport	\\/\/	_		ćn	1/17	620 102	Ç7E 100
	CBS Television Network	Bridgeport	WV	-	-	\$0 \$0	142 142	630,103 630,103	\$25,488 \$25,488





CAMPAIGN

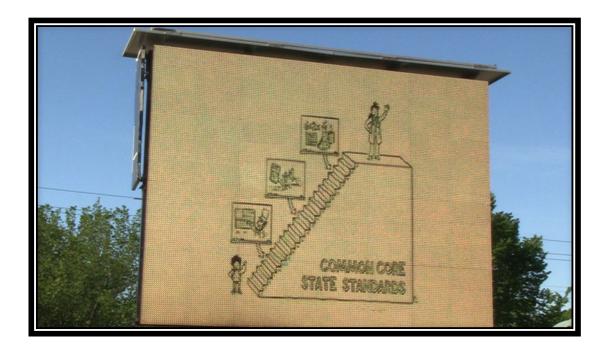
CLIENT:	COUNCIL OF THE GREAT CITY SCHOOLS (CGCS)
Market	Indianapolis, Indiana
Campaign/Event	Indy 500 Weekend
Event Begin Date	May 23rd, 2014
Event End Date	May 25th, 2014
# of Days Reported	3 Days
# of Hours Reported May 23rd	13
# of Hours Reported May 24th	13
# of Hours Reported May 25th	13
Total # of Hours Reported	39 hrs
Estimated Attendance/Impressions	in excess of 2.6 million impressions (1.2 million viewers)
Media Format	LED Screen/Jumo-tron
Creative	CGCS PSA (with sound)
Duration	:30 seconds
Frequency	2 x :30 second spots per hour, 12 hours each day
# of Spots Promised	72 Weekend Total
# of Spots Delivered	78 Weekend Total





EVENT NOTES

- The Indianapolis 500 is the highest attended single day sporting event in the world.
- The Indianapolis 500 produces a greater economic impact (\$336 million) than either the Daytona 500 or the Super Bowl.
- IRL fans are 20% more likely than the average American to have attended college.
- 61% of fans have an annual household income of \$50,000 or more.
- · IRL fans own an average of 3 vehicles and 41% have purchased a new car in past 3 years.
- 81% of Indianapolis 500 fans have access to the internet.





EVENT NOTES

- . The Indy 500 is everything... what's important is that the Indianapolis 500 is the father, mother, and granddad of all races.
- · The Indianapolis 500 encompasses the "Month of May" with three weeks of activity.
- . The usual IRL fan watches less TV than the average consumer. Therefore they are harder to reach with conventional advertising / marketing.
- · More than half of all IRL fans consciously choose a sponsor's brand because of it's association with the Indy Racing League.
- · 61% of attendees are ages 18-45.
- 69% male 31% female.





INTERVIEWS



What are the Common Core State Standards, adopted by 45 states and the District of Columbia ?

- (a) Higher standards in English language arts and math;
- (b) New standards for students in kindergarten through high school;
- (c) An initiative to prepare students for college and career success; or
- (d) All of the above? The answer: D

The Common Core State Standards were developed by the federal government – True or False? The answer: False; they were developed by state coalitions.

Did a city, suburban or rural public school rank No. 1 in the 2014 U.S. News & World Report's "Best High Schools" in America rankings?

The answer: A big-city school – School for the Talented and Gifted in Dallas.

Over the past 10 years, improvement in student performance in reading and math occurred in large city schools, suburban schools or rural schools? The answer: Large city schools.

What do first lady Michelle Obama, actor Tom Hanks and billionaire Warren Buffet have in common? They graduated from major city schools.





INTERVIEW PHOTOS













Matto

Proof of Performance Report Prepared By: Matthew Furgiuele, Broadcast Director



INTERVIEW PHOTOS



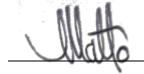












Proof of Performance Report Prepared By: Matthew Furgiuele, Broadcast Director



BRAND LOYALTY





Hits for the Three-Minute Common Core Video

VIMEO

Three-Minute Common Core Video in English on Vimeo 10/20/12 to 10/06/14

Plays: 579,409 **Loads:** 36,552,146

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Common Core State	Corestandards.org	283,384	31,627,810
Standards Initiative	_		
Council of the Great City	Commoncoreworks.org	23,947	148,260
Schools			
Council of the Great City	Cgcs.org	8,758	213,033
Schools			
Orange County Public	Pdsonline.ocps.net	6,210	10,969
Schools	_		
Arizona Department of	Azed.gov	3,747	59,009
Education	_		
Google	Facebook.com	2,663	4,283

Three-Minute Common Core Video in Spanish on Vimeo 10/20/12 to 10/06/14

Plays: 13,892 **Loads:** 809,774

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Council of the Great City Schools	Commoncoreworks.org	2,010	41,634
Council of the Great City Schools	Cgcs.org	1,280	101,934
Santa Ana Unified School District	Sausd.us	250	38,410
Arizona Department of Education	Azed.gov	190	736
Bing	Bing.com	147	217
Facebook	Facebook.com	141	147

YOUTUBE

Three-Minute Common Core Video in English on YouTube 03/15/13 to 10/06/14

Views: 11,302

Top Websites to Access Video on YouTube

Traffic Source: External Video Player			
Organization Name	Website Domain	No. of Plays	
Google	Google.com	104	
Facebook	Facebook.com	103	
Arkansas Department of Education	arkansased.org	52	
Douglas School District (Box Elder, SD)	dsdk12.net	36	
A+ Educators	4aplus.com	29	
State of Colorado	Twitter.com	24	

Traffic Source: Embedded Video Player			
Organization Name	Website Domain	No. of Plays	
State of California	Ca.gov	6,841	
Hemet Unified School District (Hemet, CA)	Hemetusd.k12.ca.us	1,192	
Google	Google.com	140	
Higher Ed for Higher Standards	Higheredforhigherstandards.org	91	
Rancho Viejo MS (Hemet USD)	ranchoviejomiddleschool.weebly.com	85	
Bonita Unified School District (San Dimas, CA)	Bonita.k12.ca.us	82	

Three-Minute Common Core Video in Spanish on YouTube 03/15/13 to 10/06/14

Views: 1,070

Top Websites to Access Video on YouTube

Traffic Source: External Video Player			
Organization Name	Website Domain	No. of Plays	
Google	Google.com	105	
State of California	Ca.gov	7	
Alum Rock Union (San Jose, CA)	arusd.org	5	
Van Nuys MS Math and Science Magnet (Sherman Oaks, CA)	vannuysms.org	4	
Bing	Bing.com	4	
Facebook	Facebook.com	3	
Pinterest	Pinterest.com	3	

Traffic Source: Embedded Video Player			
Organization Name	Website Domain	No. of Plays	
Hemet Unified School District (Hemet, CA)	Hemetusd.k12.ca.us	505	
Google	Google.com	33	

VIMEO

<u>From the Page to the Classroom: Implementing the Common Core State Standards – English Language Arts and Literacy</u> 6/12/12 to 10/06/14

Plays: 12,405 **Loads:** 49,974

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of
			Loads
Fresno Unified	Beta.fresnounified.org	90	174
Bing	Bing.com	66	125
Boston Public School	bpscurriculumandinstruction.weeb	57	3,001
Curriculum and	ly.com/		
Instruction			
Yahoo	Yahoo.com	47	87
Atlanta Public Schools	AtlantaPublicSchools.us	33	1,939

<u>From the Page to the Classroom: Implementing the Common Core State Standards – Mathematics</u> 6/12/12 to 10/06/14

Plays: 9,280 **Loads:** 54,673

Top Websites to Access Video on Vimeo

Organization	Website Domain	No. of Plays	No. of
Name			Loads
Boston Public	http://bpsmathematics.weebly.com/	244	11,744
School			
Mathematics			
Atlanta Public	Atlanta.k12.ga.us	87	2,682
Schools			
Fresno Unified	Beta.fresnounified.org	53	96
Bing	Bing.com	49	104

Parent Roadmaps

Council of the Great City Schools' Combined Web Site Statistics

Parent Roadmaps- English Language Arts 6/01/12 to 10/05/14

Page views: 187,907

Page views are defined as number of times a web page was viewed

Unique Page views: 134,538

Unique page views are the total number of unique (individual) visitors to a specific web page

during the same session (visit)

Parent Roadmaps- Mathematics 6/01/12 to 10/05/14

Page views: 189,868

Page views are defined as number of times a web page was viewed

Unique Page views: 136,337

Unique page views are the total number of unique (individual) visitors to a specific web page

during the same session (visit)

Parent Roadmaps- English Language Arts (Spanish) 6/01/12 to 10/05/14

Page views: 25,690

Page views are defined as number of times a web page was viewed

Unique Page views: 17,852

Unique page views are the total number of unique (individual) visitors to a specific web page

during the same session (visit)

Parent Roadmaps- Mathematics (Spanish) 6/01/12 to 10/05/14

Page views: 21,441

Page views are defined as number of times a web page was viewed

Unique Page views: 14,578

Unique page views are the total number of unique (individual) visitors to a specific web page

during the same session (visit)





THE 35th ANNUAL

ell Awards

2014 Silver Telly Winner

Honoring outstanding local, regional, and cable television commercials and programs, as well as the finest video and film productions, and work created for the web.

Council of the Great City
Schools
Common Core Video
Use of Animation

HOW WE HELP AMERICA'S URBAN PUBLIC SCHOOLS



How We Help America's Urban Public Schools

> A Summary of Membership Benefits of the Council of the Great City Schools



How We Help America's Urban Public Schools

Jumoke Hinton Hodge, Chair of the Board Richard Carranza, Chair-Elect of the Board Felton Williams, Secretary/Treasurer Valeria Silva, Immediate Past-Chair

Michael Casserly, Executive Director

2014-2015

A Summary of Membership Benefits of the Council of the Great City Schools



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Introduction



The Council of the Great City Schools brings together the largest urban public school systems in a coalition dedicated to the improvement of education for children in the nation's inner cities.

Founded in 1956 and incorporated in 1961, the Council is governed by a Board of Directors composed of the superintendent of schools and one school board member from each city, making

it the only independent national organization so constituted and the only organization whose sole purpose is urban education.

The Council and its member districts strive to help urban schoolchildren become successful and productive members of the global community. The Council informs policymakers, the media, and the public of the successes and challenges of schools in the nation's Great Cities. And urban school leaders from across the country use the organization as a source of information and a forum for coordinating their joint activities.



National advocacy, service, and capacity building shape the Council's activities on behalf of urban schools across the country. Legislation, research, communications, leadership and management, and teaching and learning comprise the organization's functions. As members of the Council, school district personnel from coast to coast share concerns and solutions, capitalizing on strength in numbers, building their expertise, and discovering how their counterparts in other cities have solved similar challenges.

In addition, joint efforts with other organizations, agencies, corporations, policymakers, and coalitions extend the voice of the Council beyond its individual members onto a broader national stage that will ultimately benefit from the contributions of today's urban students.

About the Council of the Great City Schools Vision

Urban public schools exist to teach students to the highest standards of educational excellence. As the primary American institution responsible for weaving the strands of our society into a cohesive fabric, we — the leaders of America's Great City Schools — see a future where the nation cares for all children, expects their best, appreciates their diversity, invests in their futures, and welcomes their participation in the American dream. The Great City Schools are places where this vision becomes tangible and those ideals are put to the test. We will keep our commitments. And as society supports our endeavors, cities will become the centers of a strong and equitable nation, with urban public schools successfully teaching our children and building our communities.

Mission

It is the special mission of America's urban public schools to educate the nation's most diverse student body to the highest academic standards and prepare them to contribute to our democracy and the global community.

Goals

- To educate all urban school students to the highest academic standards
- To lead, govern, and manage our urban public schools in ways that advance the education of our children and inspire the public's confidence
- To engage parents and build a confident, committed, and supportive urban community for raising the achievement of urban public schoolchildren

Membership Eligiblity

School districts eligible for membership must be located in cities with populations over 250,000 and student enrollment over 35,000. School districts located in the largest city of any state are also eligible for membership, based on urban characteristics. If the Board of Education has jurisdiction over areas outside of the central city, then the enrollment of those areas may also be included for purposes of eligiblity, but the population outside the central city shall not.

What Do Members Get for Our Dues?

- Access to the Council's unique network of urban public school leaders and staff
- Access to the nation's foremost team of experts in education legislation, policy, and regulations to ensure you have the best information on local and federal policy developments and are able to address special advocacy needs you may have
- Use of the organization's strategic support teams to review instructional programs, special education, bilingual education, budget and finance operations, business services, and other functions of your school system to ensure they are operating effectively and efficiently
- The Council's monthly newsletter reporting the latest developments in urban schools across the country and providing an outlet for you to showcase your successes and progress
- Access to the Council's unique performance management system and key performance indicators, allowing you to compare your operations on some 500 measures with your peers across the nation
- Access to the Council's online job sites, allowing you to advertise your district's vacant administrative positions
- Access to the Council's searchable online library of administrative tools, manuals, policies, and procedures from big-city schools nationwide
- Access to on-site briefings for school board members and others undertaking the superintendent search process, and guidance on how to conduct such a search successfully
- Access to Council scholarships for African American and Hispanic graduates of our districts who are pursing STEM fields in college
- Access to Council award programs honoring special achievements in urban education
- Use of the Council's public service announcements and videos on college- and career-ready standards and the progress of urban public schools

- Political and strategic advice on positioning your school systems for success
- Assistance in solving operational problems with federal grant programs
- Access to Council convenings and professional development on implementing college- and career-ready standards, along with implementation tools and materials
- Ability to query other big-city school systems across the nation on policies and practices
- Ability to act jointly with other urban school systems with similar challenges on shared priorities
- Ability to participate in the Council's research projects and access to all of the organization's analyses, special reports, case studies, research briefs, surveys, and data
- Technical assistance for member districts participating in the Trial Urban District Assessment of NAEP
- Access to the organization's regular "job-alike" meetings and conferences of chief academic officers, research directors, human resource directors, legislative liaisons, chief operating officers, chief information officers and IT directors, public relations officers, bilingual education directors, chief financial officers, and others
- Complimentary registration for the superintendent and school board representative to the Annual Fall Conference of the Great City Schools, the nation's premier gathering of urban school leaders
- An annual report that itemizes services that the Council provides to your district and the return on investment you get for your dues
- Voting rights for the superintendent and one school board representative on the Council's Board of Directors

Summary of Membership Services

We Help America's Schools by:

Legislative and Advocacy Services

- Providing legislative advocacy for urban schools before Congress and the executive and judicial branches of the federal government, bringing millions of dollars in extra federal support to urban school districts each year
- Representing urban schools at national meetings; on task forces, commissions, and advisory groups; and in conferences with Congress, federal agencies, educational associations, and others to ensure a strong voice for urban public education
- Devising and implementing legislative and regulatory strategies and interventions on behalf of member urban school systems
- Providing regular updates for members on federal legislative and agency activities affecting urban schools
- Providing on-call technical assistance for staff in member districts on the implementation of federal programs
- Holding regular meetings of member legislative and program staff to share information on federal program implementation, issues, and recommendations
- Convening an annual Legislative and Policy Conference in Washington featuring leading legislators and federal policymakers
- Delivering timely legislative alerts and briefing papers on issues of particular importance to urban districts
- Conducting city-specific analysis of the effects of federal legislative proposals on member school systems
- Intervening in federal court cases on behalf of member school districts
- Providing direct access to Washington's best legislative staff and to the federal bill amending and writing process
- Creating partnerships as needed with the nation's mayors, corporations, and other advocacy groups to promote issues facing urban education



"What's so nice about this award from the Council is that you have been there for the long haul. We've come across a lot of fads and quick fixes in education in the last 40 years and a lot of shortcuts but this organization has always had their eye on the prize and knows that educating students in urban communities is doable."

- Rep. George Miller, member of Congress, upon accepting a Lifetime Achievement Award from Council Executive Director Michael Casserly.

Research Services

- Conducting statistical analysis, research, and surveys on the conditions, successes, and challenges of urban schools
- Publishing research-based reports on why some urban school districts see faster improvements than others and what is behind the differences
- Conducting studies of issues that are critical to urban districts such as turnaround schools, principal supervisors, and demographic changes
- Analyzing and publishing annual member district reading and math state test scores in the organization's *Beating the Odds* series
- Providing on-call statistics and data for member urban districts and the nation on a wide variety of urban education topics
- Serving as a clearinghouse for research, data, and information on issues concerning urban schools
- Maintaining a research listserv as a channel for research directors and staff in member districts to exchange information
- Providing technical assistance, guidance, and analysis to member districts participating in the Trial Urban District Assessment of NAEP
- Conducting special analyses of NAEP data to inform member districts of instructional challenges and needs
- Providing online facts and statistics about Council member districts
- Providing research and guidance for the Council's Males of Color initiative.

- Representing urban school districts before various national research organizations
- Representing member districts at forums and meetings of the Partnership for Readiness for College and Careers (PARCC) and the Smarter Balanced Assessment Consortium (SBAC)
- Collecting and analyzing information on member district assessment practices
- Holding regular meetings of member research and assessment staff to share information on program evaluations, testing practices, data needs, and other areas
- Conducting strategic reviews of the research and accountability departments and operations of member districts

Communications Services

- Developing major public relations initiatives that focus attention on urban education priorities, rally public support, and articulate the needs and direction of urban schools
- Writing articles and opinion pieces in nationally-circulated newspapers and magazines, as well as generating broadcasts and commentary on television, radio, and social media in support of urban schools
- Writing specially tailored op-ed pieces for city newspapers on issues important to individual urban school districts, and providing national context and comparisons for local media on urban schools
- Publishing the *Urban Educator*, an award-winning monthly newsletter
 providing updates on the latest national, state, and city developments in
 urban education and showcasing member district successes and progress
- Conducting national press conferences and media conference calls linking the membership with the national press on critical and timely issues
- Producing public service announcements to highlight the progress of urban schools and to inform the public on issues critical to member districts
- Offering technical assistance to member school districts on working with the press and establishing successful communications operations

- Publishing an annual report highlighting Council and membership activities over the year
- Hosting an annual National Town Hall Meeting on urban issues of the day
- Conducting and publishing a survey of public relations offices in bigcity school districts every other year
- Holding regular meetings of public relations executives in member districts to share best practices and discuss ongoing challenges
- Maintaining a Public Relations Executives listserv as a channel for communications staff in member districts to exchange information
- Maintaining the Council's social media channels
- Operating and maintaining the Council's extensive web site (<u>www.cgcs.org</u>)
 and the Common Core Works web site (<u>www.commoncoreworks.org</u>)



Teaching and Learning Services

- Assessing the instructional, special education, and bilingual programs
 of member districts and providing strategic support and professional
 development to help improve them
- Spearheading and supporting the adoption and transition to collegeand career-ready standards in member urban school districts
- Producing print and electronic materials and tools and convening professional development meetings, webinars, and advisory groups of member district academic staff to support and guide effective implementation of the Common Core State Standards and other college- and career-ready learning standards
- Developing detailed rubrics and other tools to help member districts determine the degree of alignment between instructional and curricular materials and the common core standards
- Representing urban member districts in national discussions on standards, assessment, and urban progress
- Responding to requests for information from member districts on instructional programs, supplemental materials, interventions, and other academic information
- Maintaining a curriculum listserv as a channel for curriculum staff and directors in member districts to ask questions and exchange information
- Developing key academic performance indicators and cost measures to allow districts to benchmark instructional progress and to promote effective instructional spending
- Providing support, materials, analysis, and tools to highlight and address the academic needs of English language learners
- Building district awareness and capacity to address achievement gaps and improve the instruction and educational outcomes of poor and minority students, especially males of color

Leadership and Management Services

- Assessing the management and operations of member districts and providing strategic support to improve them
- Providing access to the Council's groundbreaking online performance management system to allow member districts to track and compare their operational management and expenditures to those of other large urban districts nationwide
- Providing strategic advice and research to member district superintendents and school board members on a variety of financial, leadership, and management topics
- Providing on-call information and best practices on management, administrative, and operational topics
- Providing technical assistance to member districts beginning the search for new superintendents and senior managers
- Providing specialized professional development to urban school executives to build the pipeline of rising line administrators
- Providing access to online management and operational resources, materials, and tools
- Maintaining various listservs for CIOs, COOs, CFOs, HR directors, food services directors, transportation directors, and others to ask questions and exchange information, and convening regular meetings to facilitate information-sharing and collaboration
- · Maintaining a job bank for member urban school districts



Forums and Staff Liaison Groups

- **Staff Liaison Groups**: networks of senior managers who meet annually to discuss best practices and solve common problems—
- ✓ Legislation: directors of government relations, federal legislation and federal program administration in such areas as Title I, Medicaid, school lunch, E-Rate, special education and bilingual education
- ✓ Research and Evaluation: directors of research, evaluation, testing, and accountability
- ✓ *Public Relations*: directors of public information, communications and media relations
- ✓ *Human Resources/Personnel*: directors of human resources and personnel operations
- ✓ Finance: directors of finance, business, and procurement
- ✓ *Curriculum and Instruction*: directors of curriculum and instruction, chief academic officers, and content specialists
- ✓ Operations/Administration: directors of management, operations, administration and facilities, transportation, food services, security, and other business services
- ✓ Technology: chief information officers and technology directors
- ✓ Bilingual Education: directors of bilingual, immigrant, and refugee education
- Council of the Great City Colleges of Education: a coalition of deans and other staff of Great City Colleges of Education in member cities whose purpose is to coordinate the work of higher education and K-12 education in cities and to collaboratively address issues of professional development, teacher recruitment, curricula, and more.

Strategic Support Teams

The Council provides on-site district assessments, technical assistance, and peer reviews to its members. This is done by marshaling the expertise of the organization's members to help each other improve. Reviews are conducted in the areas of:

- *Curriculum and Instruction* (e.g., reading and math programming, instructional strategy and organization, professional development, low performing schools, accountability systems, special education, bilingual education, and other areas)
- Management and Operations (e.g., organizational structure, staffing levels, procurement, budgeting, personnel operations, MIS, technology, facilities management, finance and budget operations, governance, transportation, food services, and other areas)
- Research and Assessment (e.g., testing, research department structure, data collection and use, program evaluation, and other areas)
- *Communications* (e.g., department structure, marketing, internal communications, community outreach, publications, and media relations)
- Federal Programs (e.g., Title I, II, III of NCLB, afterschool programs, use of funds, and program alignment)

(The Council has produced hundreds of reports on the instructional, management, and operational functions of urban schools as a result of the peer reviews.)



Major Conferences

The Council convenes two major conferences each year: the spring Legislative and Policy Conference and the fall Annual Conference of the Great City Schools. All conference registration fees are waived for Council member superintendents and the school board representative to the Council.

Spring Legislative and Policy Conference: a forum held in Washington, D.C. each spring for the membership to discuss recent developments in federal legislation and funding and to advocate the policy positions of urban public schools.



Urban school leaders listen intently at Legislative/Policy Conference session.

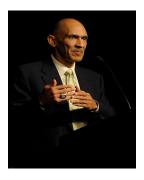


Portland student Abby Pasion attended the Annual Legislative/Policy Conference because she aspires to be a student board member.



U.S. Secretary of Education Arne Duncan, center, poses with urban school superintendents after meeting with them at the Council of the Great City Schools' Annual Legislative/ Policy Conference in Washington. They discussed issues, challenges, and achievements in big-city school districts.

Fall Conference of the Great City Schools: a general forum held each fall in one of the member cities for the entire membership to discuss special issues in urban education and to share information and best practices across districts to improve outcomes for urban students.



"The success of our country is determined by how well we educate our young people."

-Tony Dungy Super Bowl football coach, Author Guest speaker, 57th Annual Fall Conference

Urban Educators are "the rainbows in other people's clouds."

- Maya Angelou Renowned poet and scholar Guest speaker, 40th Annual Fall Conference





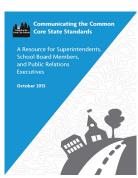
"My mother never viewed education as a luxury, but an obligation. [She knew] it was the only hope for a more prosperous future."

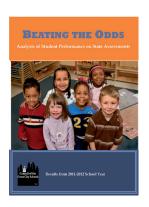
-America Ferrera Actress, education advocate Guest speaker, 56th Annual Fall Conference

Periodicals, Booklets, and Reports

- *Urban Educator*: an award-winning, monthly newsletter covering the latest developments in urban schools nationally and distributed to member school boards, superintendents, central office managers and administrators, Congress, the White House, federal agencies, urban colleges of education, mayors, foundations, the news media, governors, educational associations, and others
- Communicating the Common Core State Standards: A Resource for Superintendents, School Board Members, and Public Relations Executives
- · Good News in Urban Schools
- Celebrating 50 Years of Service to America's Urban Public Schools: 1956-2006
- Beating the Odds: A City-by-City Analysis of Student Performance and Achievement Gaps on State Assessments
- Rethinking Leadership: The Changing Role of Principal Supervisors
- Managing for Results in America's Great City Schools
- A Call for Change: Providing Solutions For Black Male Achievement
- English Language Learners in America's Great City Schools: Demographics, Achievement, and Staffing
- Today's Promise, Tomorrow's Future: The Social and Educational Factors Contributing to the Outcomes of Hispanics in the United States
- A Framework for Raising Expectations and Instructional Rigor for English Language Learners







- Pieces of the Puzzle: Factors in the Improvement of Urban School Districts on the National Assessment of Educational Progress
- Charting Success: Data Use and Student Achievement in Urban Schools
- Implementing the Common Core Standards: Progress Reports from the Great City Schools
- Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support
- Beyond Test Scores: What NAEP Results Tell Us About Implementing the Common Core in Our Classrooms
- Urban School Superintendents: Characteristics, Tenure, and Salary Survey and Report
- Urban School Board Survey: Characteristics, Structure, and Governance of Large Urban Public School Boards
- Parent Roadmaps to the Common Core (Mathematics and English Language Arts and Literacy, Kindergarten - High School, English and Spanish)
- The Senior Urban Education Research Fellowship Series:
 - *Examining Classroom Talk in the San Diego Unified School District
 - *An Examination of Professional Learning Communities in St. Paul Public Schools
 - *Predicting High School Outcomes in the Baltimore City Public Schools
 - *An Examination of Teacher Use of the Data Dashboard Student Information System in Cincinnati Public Schools
 - *The Post-Secondary Coach Program in Chicago: Does it Affect the College Going Process?
 - *Word Generation in Boston Public Schools: Natural History of a Literacy Intervention
 - *Accountability and Performance in Secondary Education in Milwaukee Public Schools
 - *Lessons for Establishing a Foundation for Data Use in DC Public Schools

Online Services

- The Great City Schools web site—www.cgcs.org—provides regularly
 updated information on Council activities, policy positions, research,
 legislation, management, conferences, publications, and links to other
 resources.
- The Council's Common Core State standards web site—<u>www.</u> <u>commoncoreworks.org</u>—provides information and tools to help school districts better implement the new academic standards.



The icon buttons for Twitter and Facebook are housed on the Council's homepage.



- The Council's EduPortal provides an extensive online and searchable library of management and operational materials from the member districts.
- The Council's Key Performance Indicator site provides member school districts with the mechanism to enter their non-instructional performance data and compare themselves to other districts.

Videos

- Common Core award-winning three-minute video explaining the purpose and features of the Common Core State Standards (English and Spanish)
- Common Core 30-second public service announcement that has run on television and radio stations across the country (English and Spanish)
- Common Core professional development sessions on mathematics and English language arts
- Videos of Council National Town Hall Meetings on topics such as race, language, and culture; how to prevent student bullying; and other cutting-edge issues

- Videos of Council Fall Conference key note speakers such as Super Bowl football coach Tony Dungy, author Tom Friedman, actress America Ferrera, and many others
- Call for Change video on black males
- Public service announcements from the Council's national advertising campaign to improve the image of urban public schools and support the common core









"At our next Board Meeting, I will have it run to educate those present and stimulate discussion for its further use. What is even better is that it can be shared at no cost to our district – a very nice membership benefit. The PSA/Videos are very well done, clear and concise. I am so happy that it is available in Spanish, too. Thank you!"

- Cecelia Adams, Board Member, Toledo Public Schools

Awards and Scholarships

 Green-Garner Award: the Council's annual urban education award (in collaboration with ARAMARK Education and Voyager Learning/ Sopris Learning) for outstanding leadership by a superintendent or school board member



Denise Link (center) holds her \$10,000 oversize check and is congratulated by Voyager Learning/Sopris' Carolyn Getridge, ARAMARK's Dennis Maple and Council Executive Michael Casserly as her son looks on.



Cleveland student Yu Zhang, second from left, holds his \$10,000 oversize check and congratulated by, left to right, his mom, school board chair Denise Link and principal Irene Javier.

- Queen Smith Award for Commitment to Urban Education: the Council's annual award for outstanding service to urban education among professional educators and teachers (in collaboration with McGraw-Hill)
- Dr. Shirley S. Schwartz Urban Education Impact Award: the Council's annual award for exemplary partnerships between universities and urban school districts
- ExxonMobil Bernard Harris Scholarships in Math and Science: the Council's annual scholarships to graduating African American and Hispanic seniors in member school districts who plan to pursue college majors in STEM fields (in collaboration with the ExxonMobil Foundation and the Harris Foundation)
- Research and Assessment Leadership Award: the Council's annual award for an outstanding urban school official who exemplifies leadership, innovation, and commitment to improving student

- achievement (in collaboration with Houghton Mifflin, Inc. and Curriculum Associates)
- Curriculum Leadership Award: the Council's annual award to an outstanding urban school official who exemplifies leadership, innovation, commitment, and professionalism in improving instructional quality and raising student achievement (in collaboration with Pearson Education, Inc.)
- Human Resources Leadership Award: the Council's annual award to human resources and personnel directors for outstanding leadership in the area of human capital management
- Operations Leadership Award: the Council's annual award to a chief operating officer in a member school district who has demonstrated outstanding leadership in a non-instructional operating area
- **Bob Wise Award**: the Council's annual award to a chief financial officer in a member school district who has demonstrated outstanding leadership in financial management
- **Information Technology Leadership Award**: the Council's annual award to a chief information officer for outstanding leadership in the area of information technology and/or management information services
- Award for Excellence in Financial Management: the Council's award to recognize Council member districts that meet the highest standards of financial accountability and performance



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BERNARD HARRIS SCHOLARSHIPS

2014 ExxonMobil Bernard Harris Math and Science Scholarship Applicants

Total Candidates from Council Districts: **302**

Number of Districts Represented: 49

Number of African American Male Applicants: **67** Number of African American Female Applicants: **103**

Number of Hispanic Male Applicants: **56** Number of Hispanic Female Applicants: **76**

	Black		Hispanic		Total
	Female	Male	Female	Male	Applicants
Albuquerque Public Schools	1	0	1	0	2
Anchorage School District	1	0	0	0	1
Atlanta Public Schools	0	0	1	0	1
Austin Independent School District	0	0	4	1	5
Baltimore City Public Schools	1	0	0	0	1
Boston Public Schools	1	0	0	2	3
Broward County Public Schools	2	2	3	6	13
Buffalo Public Schools	1	0	0	0	1
Charleston County School District	0	1	1	0	2
Charlotte-Mecklenburg Public Schools	8	5	4	1	18
Chicago Public Schools	3	3	2	3	11
Clark County Public Schools	5	0	1	3	9
Cleveland Metropolitan School District	1	3	0	0	4
Columbus City Schools	0	1	0	0	1
Dallas Independent School District	0	1	2	2	5
Denver Public Schools	0	0	1	1	2
Detroit Public Schools	3	2	1	0	6
District of Columbia Public Schools	1	3	1	0	5
Duval County Public Schools	1	1	0	2	4
East Baton Rouge Parish School System	3	3	0	0	6
Fort Worth Independent School District	1	0	0	0	1
Fresno Unified School District	1	0	1	0	2
Guilford County Schools	8	2	1	1	12
Hillsborough County School District	7	1	3	3	14
Houston Independent School District	5	2	11	4	22
Jackson Public School District	2	0	0	0	2
Jefferson County Public Schools	1	0	0	1	2
Kansas City	2	1	0	0	3
Little Rock School District	2	3	0	0	5
Long Beach Unified School District	1	0	2	2	5

	Black		Hispanic		Total
	Female	Male	Female	Male	Applicants
Metropolitan Nashville Public Schools	6	1	2	0	9
Miami-Dade County Public Schools	2	4	11	6	23
Milwaukee Public Schools	2	1	0	1	4
New York City Department of Education	8	5	1	2	16
Newark Public Schools	1	0	0	0	1
Oakland Unified School District	2	0	0	0	2
Omaha Public Schools	1	1	0	0	2
Orange County Public Schools	7	9	9	3	28
Richmond Public Schools	0	1	0	0	1
Sacramento City Unified School District	1	0	1	1	3
San Diego Unified School District	0	2	7	4	13
San Francisco Unified School District	0	0	0	2	2
Seattle Public Schools	0	0	1	0	1
Shelby County Schools	3	0	1	1	5
St. Louis Public School	0	1	0	0	1
St. Paul Public Schools	1	0	0	0	1
The School District of Palm Beach County	4	5	3	2	14
The School District of Philadelphia	3	2	0	2	7
	103	67	76	56	302

THE URBAN EDUCATOR



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LEGISLATIVE

· Lame Duck Congress, p.10

The Nation's Voice for Urban Education

October 2014

Vol. 23, No. 7

www.cgcs.org

Graduation Rate Sets New Record

North Carolina's third largest school system, Guilford County Schools in Greensboro, set a record with its Class of 2014: 88.5 percent graduation rate.

The four-year graduation rate exceeds the 2014 state average of 83.8 percent, the district reported. And it also surpasses the national high-school graduation rate, which U.S. Secretary of Education Arne Duncan announced this past May as 80 percent in 2012--the highest in America's

Town Hall Meeting to Tackle Issues of Testing



Claudio Sanchez

Issues such as the purpose, use and practice of testing in schools, and the hot topic of possible testing, will be the center discussion the Council of the Great City Schools' National Town Hall Meeting on Oct. 24 in Milwaukee.

The pinnacle event of the Council's 58th Annual Fall Conference, Oct. 22-26, hosted by Milwaukee Public Schools, will be moderated by National Public Radio education correspondent Claudio Sanchez.

A former elementary and middle school teacher, the veteran journalist has been covering education on the national desk of NPR for many years, joining the radio network in 1989. Sanchez's reports air regularly on National Public Radio's award-

Town Hall continued on page 3

Graduation Rate continued on page 4

Florida's Orange County Schools in Orlando Co-Winner of Top Prize

Florida's Orange County Public Schools in Orlando last month became the first co-winner of the Broad Prize for Urban Education in the 13-year history of the million-dollar award, sharing the prize with Georgia's Gwinnett County Public Schools.

As co-winners of the 2014 award, the two districts will split the \$1-million prize, with each receiving \$500,000 in college scholarships for their high school seniors, the Eli and Edythe Broad Foundation announced.

The Broad (rhymes with "road") Prize recognizes urban school districts that are making the greatest progress in raising student achievement while reducing achievement gaps among economically disadvantaged students and students of color.

"There is no single solution to the challenge of ensuring a world-class education for every child," said U.S. Secretary of Education Arne Duncan, referring to different paths the two winning school districts took to succeed. "Yet, the real winners in both places are the same: children."

In a decision to award both school districts, a jury of prominent leaders from education and public service determined that honoring two districts with two different strategies might inspire more school leaders nationwide to consider varying ways to raise student achievement.

Top Prize continued on page 4



Employees of Orange County Public Schools in Orlando, Fla., celebrate at district headquarters upon the announcement that the district is selected as a co-winner of the Broad Prize for Urban Education. They viewed a live webcast of the victory.

INSIDE THE COUNCIL OCTOBER 2014

2014 National Blue Ribbon Schools Named

The Houston Academy for International Studies is one of Houston's early college high schools, offering students the chance to complete an associate's degree through Houston Community College while earning their high school diploma.

Students are required to take four years of a foreign language (Spanish or Mandarin Chinese), take a course in Model United Nations, and create a portfolio of | projects with a global perspective.

Lincoln College Preparatory Academy in Kansas City, Missouri, is an International World School where students have the opportunity to graduate with a prestigious IB Diploma. Eighty-nine percent of the school's enrollment is comprised of minority students and 72 percent are students from economically disadvantaged families.

In addition to offering students rigorous academic instruction, these two schools also have something else in common. They are among the 337 schools the U.S. Department of Education recently recognized as National Blue Ribbon Schools for 2014 for their academic excellence or for making exemplary progress in closing the achievement gap.

The National Blue Ribbon Schools Program honors public and private elementary, middle, and high schools in one of two performance categories:

- Exemplary High Performing Schools are among their state's highest performing schools as measured by state assessments on nationally normed tests.
- Exemplary Achievement Gap Closing Schools are among their state's highest performing schools in closing achievement gaps between a school's subgroups and all students over the past five years.

Blue Ribbon continued on page 4



Fifth-grade students from Cielo Vista Elementary School in El Paso, Texas, celebrate after learning their school was selected as a 2014 Blue Ribbon School. Photo credit: El Paso Independent School District

Council officers

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Jumoke Hinton Hodge Board Member, Oakland

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Richard Carranza Superintendent, San Francisco

Secretary-Treasurer

Felton Williams

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A newsletter published by the Council of the Great City Schools, representing 67 of the nation's largest urban public school districts.

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Detroit

East Baton Rouge El Paso Fort Worth Fresno Greensboro Honolulu Houston Indianapolis Jackson Jacksonville Kansas City

Long Beach Los Angeles Louisville Miami-Dade Milwaukee Minneapolis Nashville Newark **New Orleans** New York City Norfolk

Oakland Oklahoma City Omaha Orange Co. Palm Beach Philadelphia Pittsburgh Portland Providence

Richmond

Rochester

Sacramento San Diego San Francisco Santa Ana Seattle Shelby Co. St. Louis St. Paul Tampa Toledo Washington DC Wichita

All news items should be submitted to: **Urban Educator** Council of the Great City Schools 1301 Pennsylvania Avenue, N.W. Suite 702 • Washington, DC 20004 (202) 393-2427 • (202) 393-2400 (fax)

Find the Council on:





URBAN EDUCATOR 2

OCTOBER 2014 INSIDE THE COUNCIL

Milwaukee Selects Superintendent; El Paso Leader's Tenure Extended



Darienne Driver

Driver Darienne ioined Milwaukee Public Schools in July 2012 as the district's first chief innovation officer, where she led efforts to improve outcomes in the schools in greatest need of improvement.

Two years later, Driver is now the leader of the 78,502-student school district, the largest in the state of Wisconsin.

Driver was recently selected by the Milwaukee Board of School Directors to lead the school system after serving as acting superintendent since July 2014. She will be the district's first permanent female superintendent, succeeding Gregory Thornton, who left the district in July to head Baltimore City Public Schools.

After Thornton departed, the district selected Driver as acting leader, while they conducted a search for a permanent superintendent.

But the board eventually realized that Driver was the best candidate for the position and subsequently canceled the superintendent search.

"Dr. Driver is a visionary, highly qualified and energetic educator," said Michael Bonds, the board president. "... The board has every confidence that Dr. Driver will continue to lead the district in a positive direction and continue our efforts and commitment to improve outcomes for the children of Milwaukee Public Schools."

In addition to helping high-need schools improve as chief innovation officer, Driver also oversaw the district's implementation of the Wisconsin Common Core State Standards in literacy and mathematics and recruited several educational organizations to serve as partners in efforts to boost student academic achievement.

Contract Extension

Juan Cabrera took the reins of Texas' El Paso Independent School District in



Juan Cabrera

September 2013 after working as a school law attorney and general counsel to more than 20 Texas school districts.

Under his leadership, full governance accreditation been restored to the

school district, dual language programs have been expanded to pre-K and kindergarten classes, and the central office has been streamlined and reorganized. In addition, beginning this fall, students and teachers in the district will receive digital textbooks as part of the school system's etext device initiative.

As a result, the district's board of managers recently voted to extend Cabrera's contract for an additional year to 2019.

Board President Dee Margo said Cabrera has shown great leadership and made significant progress during his first year as superintendent.

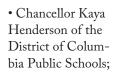
Town Hall continued from page 1

winning newsmagazines Morning Edition, All Things Considered and Weekend Edition.



Kaya Henderson

The town hall meeting panel will feature:



• Superintendent

Valeria Silva of

Minnesota's St.

Paul Public Schools;





Valeria Silva



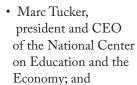
Chris Minnich





Jumoke Hinton Hodge

- · Chris Minnich, executive director of the Council of Chief State School Officers;
- · School board member Jumoke Hinton Hodge of the Oakland Unified School District and chair of the Council of the Great City Schools;





Marc Tucker



· Jaxs Goldsmith, a senior at Milwaukee's Riverside University High School and senior class president.

Related the to 90-minute town hall meeting will be a Council study on testing -- a survey of current assessment practices in the nation's big-city school districts aimed at improving testing.

The town hall meeting is scheduled on Oct. 24 from 2:30 to 4 pm at the Hilton Milwaukee City Center.

INSIDE THE COUNCIL OCTOBER 2014

Top Prize continued from page1

For Orange County Public Schools, it was the first time the district has been a finalist for the prize. It is credited for raising achievement among low-income middle school students and narrowing income and ethnic achievement gaps.

"The Council of the Great City Schools salutes the achievements of the Orange County Public Schools in Florida as a winner of the Broad Prize for Urban Education," said Council Executive Director Michael Casserly. "The school district's board of

education, superintendent, staff and teachers deserve every kudo. Great job, Orlando!"

The Orange County school district is a member of the Council.

Blue Ribbon continued from page 2

For this year's award, the Department of Education strengthened the focus of both categories' performance criteria around subgroups within a school and improving graduation rates for all students.

In addition to schools in Houston and Kansas City, Blue Ribbon honors were also presented to big-city schools in San Francisco, Miami, Honolulu, Chicago, Indianapolis, Baton Rouge, Louisville, New York City, Philadelphia, Nashville, Fort Worth, El Paso, Dallas as well as schools in the Los Angeles district, Clark County (Las Vegas), and Florida's Palm Beach County and Hillsborough County (Tampa) districts. Clark County and El Paso had two schools recognized, while Hawaii and Palm Beach had three, Dallas had four and New York City had five.

To celebrate their achievement, each school will be honored Nov. 10-11 in Washington, D.C., at an awards ceremony.



Posing at the 2014 Broad Prize event in New York City are, left to right, past superintendent of Orange County Schools Ronald Blocker, former British Prime Minister Tony Blair, Edythe and Eli Broad, Orange County Schools Superintendent Barbara Jenkins, Orange County Public Schools Board Chairman William Sublette and U.S. Secretary of Education Arne Duncan.

Graduation Rate continued from page 1

history, he indicated.

Guilford County Schools (GCS) has seen its graduation rate rise for the sixth consecutive year. The 2013 rate was 86.2 percent. And its black students district-wide had an 86.9 percent graduation rate in 2014, according to district Chief of Staff Nora Carr.

"We are incredibly proud of our students, teachers and staff, who prove that hard work and determination pays off," said GCS Superintendent Maurice "Mo" Green in a press statement.

Seven schools achieved 100-percent graduation rates, including three schools that serve predominantly students of color and those who are disadvantaged. Fourteen other schools achieved graduation rates of more than 90 percent, including 10 traditional schools with large student populations.

"We are graduating more students who are ready to be leaders in college or in a career, as well as in their communities," stressed Superintendent Green. "Our students worked hard during their time with GCS, and I'm confident they will continue the tradition of excellence that started here."

NYC Schools Chancellor Launches Innovative Framework for School Improvement



Carmen Fariña

Chancellor
Carmen Fariña
of the New York
City Department
of Education recently launched a
bold, innovative,
research-based capacity framework
and new accountability measures

aimed at improving the nation's largest school district, which enrolls 1.1 million schoolchildren.

The framework emphasizes six critical components to assure high-achieving schools:

- Rigorous instruction;
- Supportive environment;
- Collaborative teachers;
- Effective school leadership;
- Strong family-community ties; and
- Trust

The new accountability measures, called the *School Quality Snapshot* and the *School Quality Guide*, will be aligned to the capacity framework, which will help the New York City school system gauge school quality.

The School Quality Snapshot will replace the one size fits all letter grade system, and is designed to give families a concise and accessible picture of the quality of each school.

The *School Quality Guide* will give more comprehensive information about each school, including multiple years of data so that schools' progress over time can be more easily tracked.

"Our new system affirms our commitment to recognizing that there are many

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4 URBAN EDUCATOR

OCTOBER 2014 INSIDE THE COUNCIL

New GEAR UP Grants Awarded

The Minneapolis Public Schools recently received one of 41 grants totaling \$82 million awarded by the U.S. Department of Education to help 116,000 at-risk students prepare for college.

New GEAR UP (Gaining Early Awareness and Readiness for Undergraduate Programs) grants were primarily awarded to universities and colleges and school districts in 25 states.

"It is inspiring and encouraging to win a grant like this," said Minneapolis Public Schools Superintendent Bernadeia Johnson. "These funds will help boost our efforts to close the achievement gap and ensure that all of our students are college and career ready."

The only school district in Minnesota awarded the grant is expected to receive funds over seven years, reaching nearly \$14-million. The Minneapolis GEAR UP project will serve more than 2,500 students in some 17 of the school district's middle and secondary schools.

Other big-city school districts receiving GEAR UP grants include Birmingham, Los Angeles, Hillsborough County in Tampa, Fla., and the School District of Philadelphia.

NYC Schools continued from page 4

test scores that must be considered in order to build strong schools and truly understand how well a school is doing," said Chancellor Fariña in a news statement.

"The new capacity framework and accountability system provide a clear and well-rounded mission and view of each of our schools that will allow families and school leaders to meaningfully engage about every aspect of their school community," she added.

Michael Casserly, executive director of the Council of the Great City Schools, noted that the new capacity framework "represents real positive change for New York City's schools, and will be a model for urban school systems across the country."

Five Big-City School Superintendents Vie for Top Urban Educator Award

Who will receive the nation's highest honor for urban-school leadership?

The nominees for the 2014 Green-Garner Award, recognizing the "Urban Educator of the Year," are big-city school superintendents:

- Alberto Carvalho of Miami-Dade County Public Schools;
- Eric Gordon of Cleveland Metropolitan School District;
- R. Stephen Green of Kansas City Public Schools in Missouri;
- Terry Grier of Houston Independent School District; and
- Valeria Silva of St. Paul Public Schools in Minnesota.

Anticipation will be in the air on the evening of Oct. 23 at the Council of the Great City Schools' 25th Annual Green-Garner Award Banquet in Milwaukee, held during the Council's 58th Annual Fall Conference hosted by Milwaukee Public Schools.

Sponsored by the Council, Aramark K-12 Education and Voyager Sopris Learning, the Green-Garner Award is given in memory of Richard R. Green, the first African American chancellor of the New York City school system, and businessman Edward Garner, who had served on the Denver school board.

The award is presented to an urbanschool superintendent and board member in alternate years. The winner receives a \$10,000 college scholarship to present to a student.

And the 2014 winner is ...!

Last year, the standing ovation went to Denise Link, a board member of the Cleveland school district, when called to the stage to receive the prestigious award.



Alberto Carvalho



Eric Gordon



R. Stephen Green



Terry Grier



Valeria Silva

INSIDE THE COUNCIL OCTOBER 2014

Bay Area Tech Companies Adopting San Francisco Schools

The San Francisco area has a vibrant tech industry with approximately 1,000 technology companies, so last spring an initiative was launched to connect these companies with schools in the San Francisco Unified School District.

The *Circle the Schools* initiative began as a pilot program with five schools that were connected with a partner company over the course of the school year. The companies worked with principals and teachers to organize volunteer activities tailored to meet each school's individual needs, ranging from donating books to hosting career tours.

The initiative grew to 20 schools and was so successful that tech leaders recently announced plans to have every school in the district, approximately 116, "circled" by the end of the school year.

Companies that participate in *Circle the Schools* work with the San Francisco Education Fund, a nonprofit that engages community resources to lend extra support to teachers and administrators. In elementary schools, the focus is on literacy while in middle schools the focus is on math. And in high schools, companies in the initiative will help prepare students for college and careers.

One of the schools benefiting from the initiative is Thurgood Marshall High School, which has partnered with high-tech company Tagged. According to the San Francisco Chronicle, the employees of the company have helped teachers prepare classrooms for the school year, donated tables to replace worn desks, and will offer internships to seniors at the school, where more than 80 percent of the students qualify for free and reduced-price lunch.

San Francisco Schools Superintendent Richard Carranza praised the initiative for helping to build lasting relationships between tech employees and students through a year-long partnership. "The benefit from people volunteering their time and resources is invaluable. We need partners who are actively engaged with our schools, who are willing to roll up their sleeves and get to work in order to help improve the lives of our public school students," he said.

According to the *Chronicle*, each participating company must pay \$5,000 to cover expenses involved in implementing the program. Companies must also volunteer at a minimum of three events in the course of the year.

Currently, there are about 20 companies participating in *Circle the Schools*, including Dropbox, RadioShack and Sprint.

Seattle Educator Named Washington State Teacher of the Year

Lyon Terry wants his 4th grade students to learn to be both kind and smart. He is described as a teacher who focuses on creating confident, hard-working and compassionate learners.

For his efforts, Terry was recently named Washington State's Teacher of the Year.

Terry, who joined Seattle Public Schools Lawton Elementary in 2005, is a National Board Certified Teacher and his teaching philosophy is grounded in community engagement.

For example, when Terry noticed many Lawton students riding to school in cars instead of walking, he organized Seattle's first *Walking School Bus* program. He also recruited older students to serve as crossing guards and bus greeters to aid the safety of younger students.

Terry has also served in numerous leadership roles in his school and district, most

Seattle Educator continued on page 8



Duval County Schools Superintendent Nikolai Vitti paints a bowl to donate to a Jacksonville food bank's Empty Bowls Luncheon.

Leader in Jacksonville Recognized for Art Education

Jacksonville's Duval County Public Schools Superintendent Nikolai Vitti was recently named 2014-2015 Superintendent of the Year by the Florida Art Education Association for exemplary support for arts education.

Under his leadership, Duval County schools has expanded art offerings in schools districtwide. Vitti committed to employing at least one full-time art and one full-time music teacher in each elementary school, resulting in 240 full-time permanent positions in schools districtwide. Additionally, there is an art or music program in every middle and high school. And at each location, art and music material allocation was increased, with a particular focus on high school band programs.

The district also implemented the Science, Technology, Engineering, Art, and Math (STEAM) Cultural Passport program, which ensures that every child from pre-K to 5th grade at 60 Title I elementary schools experience three cultural events a year in the city.

"I am incredibly honored to be recognized by the Florida Art Education Association," said Vitti. "The award sheds positive light on our district and community for its commitment to the whole child. The honor would not happen without the school board's support for my vision to ensure that all students are exposed to and inspired by the arts."

OCTOBER 2014 INSIDE THE COUNCIL

Philadelphia Leader Doesn't Let Budget Crisis Deter Him From Mission

This past May, William Hite, superintendent of the School District of Philadelphia, addressed a meeting of the School Reform Commission (SRC), which governs the school district. He discussed how the \$304-million budget shortfall facing the district had resulted in a shortage of counselors and nurses, and that a principal

at one of the district's high-achieving schools may have to begin the new school year with no money for copy paper.

"It is one thing to ask parents to fundraise for extras – field trips, for instance," said Hite. "But to ask them, our business partners, or the greater Philadelphia community to provide the basics because we cannot, causes me to question how we got here and whether there is public will to get back on track."

Getting the school district back with on track in the midst of severe budget problems has been a mission of Hite's since he arrived in the district in 2012, after serving at the helm of a large suburban school system in Maryland.

Even before Hite accepted the position, the Philadelphia school district was facing a budget deficit of around \$720 million. But during his visits to the district as a candidate for superintendent, he was impressed by the people he met and their passion.

"I saw the energy in people from all sectors, from the faith-based community to higher education, business, parents and staff," said Hite in an interview with the *Urban Educator*. "That level of energy was none like any I had ever seen before, and I wanted to work in an environment where so many individuals were passionate and committed to improving public education."

In his two years at the helm of the 131,000-student school district, Hite has had to make some tough decisions, including closing 31 schools, reducing the workforce by approximately 5,000 and restructuring employee contracts.

Hite has had to take these measures

Spotlight



Philadelphia Schools Superintendent William Hite has lunch with district students.

while at the same time trying to improve the academic achievement of students in a district where approximately 80 percent of students qualify for free or reduced price lunch.

Making Progress

Despite the revenue challenges, the superintendent ticks off a number of accomplishments the district has been able to achieve, including opening three new innovative high schools and launching a School Redesign Initiative, in which educators, community organizations and universities are invited to submit a proposal to redesign a school.

"We're excited that we have been able to progress in some of those areas," said Hite.

As superintendent of Philadelphia schools, the veteran educator has learned how incredibly daunting and hard the work is, especially in this day and age when there are more things that are mandated with fewer resources.

But the reason he goes to work every morning is because he enjoys talking

with children and hearing their hopes and dreams of what they want to do in spite of their circumstances and conditions.

"Children who are faced with significant circumstances choose to come to school every day," said Hite. "Those are the things that inspire me."

The district recently received some good

news when state legislators approved a cigarette tax bill that will raise an estimated \$49 million for the school system. Hite expressed his relief that the legislation was passed, but noted that the funds are already built into the district's current school-year budget, enabling the district to only keep the resources already allocated to schools, which are at best "inadequate."

While Philadelphia is not the only big-city school district experiencing budget challenges, the

problem is exacerbated, according to Hite, because the state has reduced funding to school systems, with Philadelphia bearing the brunt because it is the largest in the state and has the highest proportion of students in poverty.

Hite also noted that it is the only school district in the state of Pennsylvania that does not have the ability to generate revenue and the SRC has no authority to raise

Philadelphia Leader continued on page 8



During a school visit, Philadelphia Schools Superintendent William Hite greets a student.

INSIDE THE COUNCIL OCTOBER 2014

D.C. Schools Fellowship Program Graduates First Class of Principals



Mary Jane Patterson

Mary Tane Patterson was the first African American woman to receive a bachelor's degree when she graduated from Oberlin College in 1862, and after teaching for several years, became the first

black principal of Dunbar High School in Washington, D.C., the nation's first public school for black students.

Patterson's legacy lives on when eight Mary Jane Patterson Fellows recently began the 2014-2015 school year as principals in the District of Columbia Public Schools.

The principals were part of the first group of graduates from the Mary Jane Patterson Fellowship, an 18-month rigorous training program to prepare talented District of Columbia educators to become school principals.

The fellowship included individualized leadership coaching, mentoring by successful principals and learning sessions with professors from Georgetown University's McDonough School of Business. Fellows also had to serve one year as Resident Principals at two schools, alongside their mentor principals. Upon successful completion of the program, the fellowship graduates engaged in a comprehensive selection and matching process for principal positions.

District of Columbia Public Schools Chancellor Kaya Henderson said the fellowship was a way for the district to target and build the leadership skills of future school leaders and to keep them in the school system.

"Now, we have eight new awesome principals who are trained, ready and excited in their new roles," said Henderson. "I am so proud of these inaugural members of our MJP Fellowship and can't wait to see them in action as principals!"

The fellowship is currently in its second year of training the next cohort. District officials hope the program will not only provide high-quality preparation for school leadership, but also weave the Patterson Fellowship into internal district leadership pipelines to prepare talented employees for leadership positions at all levels of the school system.

To qualify for the fellowship, employees must have a master's degree, two years of classroom instruction, an ability to analyze data to help teachers inform instruction, strong communications skills and the ability to work collaboratively in a learning community.

Philadelphia Leader continued from page 7

taxes. This situation forces the district to depend on other entities for funding, such as the city council, the mayor, the governor and state legislators.

Hite says that the district has done everything it can, from less frequent cleaning of schools to reducing the number of police officers. In order to open schools on time this September, he had to make approximately \$32 million in cuts.

"We can't cut our way to resolving this problem because there's not enough left to cut," declared Hite. "This is a problem that is going to require additional revenue from the city and the state as well as restructuring labor agreements."

While he doesn't have a great deal of spare time, the 53-year-old, who attended Virginia Tech on a football scholarship, loves to go cycling on the weekends as well as play golf and read. The married father of two also enjoys visiting his only grandson in Richmond, Va., and participating in Philadelphia's growing restaurant scene.

And what advice would Hite, who has been a teacher, principal and central office administrator, give to those who want to follow in his footsteps and one day lead a big-city school district?

"If individuals are coming to an urban school district concerned about what people say about them, it's probably not the place for them," said Hite. "Be focused in your vision of how you want to improve educational outcomes and be very intentional about what you are trying to accomplish because detractors will be constantly working against it."

Seattle Educator continued from page 6

often in the areas of writing and literacy. During his time at Lawton, 4th-grade writing proficiency rates on the state Measurements of Student Progress test have risen more than 10 percentage points.

As the recipient of the State Teacher of the Year Award, Terry received donated cash awards, technology prizes and scholarships for classroom improvements.

Baton Rouge Program To Help At-Risk Students

East Baton Rouge Parish School System in Louisiana is currently recruiting students for enrollment in an innovative new academic program specifically tailored for high school students 17 years of age and older who are at risk of dropping out of school, as well as for former students who have left school before earning a high school diploma.

Moving Forward is a comprehensive, flexible academic program that involves an interactive web-based instructional approach with teachers available on-line on an around-the-clock basis to interact with students. The program requires only a half day of in-class participation by students.

Students who successfully complete the *Moving Forward* alternative education program will earn a regular high school diploma.

Baton Rouge continued on page 9

OCTOBER 2014 INSIDE THE COUNCIL

Chicago Opens First On-Site Job Center

Chicago Public Schools' mission to provide students with a strong academic foundation and applicable skills to prepare for success in college, career and life takes on new meaning for students at Roger C. Sullivan High School.

Nearly 700 students now have access to "The Outpost," the district's first on-site job program recently announced in partnership with the Youth Job Center. The program gives students access to free employment guidance that will prepare them with the skills they need to be successful in the 21st century workforce.

The Youth Job Center will work with students to secure part-time employment and internships that match their long-term goals through various partnerships with locally owned businesses. A career advisor will be on-site three days a week during school hours.

To support the students in building jobs skills in order to secure employment, staff will teach interview and resume skills, assist students in researching careers and aid students during the job application process.

Baton Rouge continued from page 8

"This program is intended to engage atrisk students and former students who have dropped out of school in a quality alternative education experience tailored to their needs," said Baton Rouge Schools Superintendent Bernard Taylor Jr. "It is certainly the case that some of our students and former students are challenged for many reasons taking the traditional path to a high school diploma. This program provides an attractive alternative way of achieving this goal."

The district has begun actively recruiting eligible current and former students for enrollment in the *Moving Forward* program through direct contact by guidance counselors and by various promotional methods, including flyers and telephone calls.

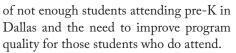
Dallas Heightens Focus on Pre-K Quality

Two students practice their literacy skills in a Dallas

pre-kindergarten classroom.

As part of his Destination 2020 plan for transformational improvement in the Dallas Independent School District, Superintendent Mike Miles wants bold changes for the district's pre-K program – with the goal of dramatically improving the school readiness rates of incoming kindergarten students.

Today, only 38 percent of students in Dallas ISD are beginning kindergarten "school ready", according to the school district. It attributes low kindergarten readiness to a combination



As a first step, Superintendent Miles created the office of Early Childhood Development, which is solely focused on pre-K education and the development of children from birth to age 5.

Last spring, Dallas ISD held a weeklong event at every one of its more than 145 elementary schools to increase early registration for its pre-K program. The event, which was a first for the district, was a huge success – more than doubling the number of parents registering their 4 year olds for pre-K early.

"Studies show that 85 percent of brain development occurs by age 5, so pre-K is critical to catching kids early with educational interventions," says Alan Cohen, executive director of the district's office of Early Childhood Development. "Particularly for at-risk children, the longer we wait, the more difficult, more expensive, and less effective all of our interventions will be."

Dallas ISD will continue to stay aggressive in its efforts to increase pre-K enrollment. "By 2020, we want to be serving all eligible 4 year olds and a significant number of 3 year olds in high quality classrooms

throughout Dallas," Cohen emphasizes.

Investing in Quality

In addition to increasing the number of pre-K students, Dallas ISD is looking to place major bets on improving classroom

quality. According to the district, even just one year of high quality pre-K should be enough to flip the odds of future success back in favor of the student.

Yet, only 47 percent of the students who attended pre-K in the district are en-

tering kindergarten on track for success. "We need to be brutally honest about where we are starting with our program quality," says Cohen. "It is clear that we have some big opportunities to improve the support we provide our students. A lot of that will come naturally from providing additional supports for our teachers."

To that end, Dallas ISD has already hired a team of pre-K specialists, experts on early childhood education who will serve as mentors and coaches to classroom teachers. In their new role, each specialist is adopting 15 classrooms, where they will be able to model best practices, provide mentorship, monitor continuous improvement, and help teachers scaffold instruction to meet the needs of every child.

Already, more than half of its over 465 pre-K classrooms are being supported by a specialist, and the district anticipates full coverage by the beginning of next school year. But Dallas ISD says this is only the first step.

"We are focused on a robust set of tactics that are proven by research to improve a child's kindergarten readiness and lifelong success," Cohen points out. "We want to invest in quality initiatives like lowering classroom ratios, providing year-

Dallas Pre-K continued on page 12

LEGISLATIVE COLUMN OCTOBER 2014

The Lame Duck and Beyond

By Jeff Simering, Director of Legislation

The 113th Congress will reconvene in a lame duck session in mid-November, having already departed Washington until after the elections.

The main agenda item when Congress returns will be the passage of annual appropriations bills or a year-long omnibus funding measure. The election results, particularly those that determine control of the U.S. Senate, will affect how the annual funding bills are handled.

Since most federal education programs have not been fully restored to their pre-sequestration funding levels, decisions in the lame duck session on the FY 2015 spending measures will

be critical for school districts. There is also a chance that funding bills could be delayed through another short-term continuing resolution until the 114th Congress convenes in January.

In any case, there is scant authority within the current budget ceilings to increase funding for current programs without cutting others. Attempts at accommodating new international and domestic priorities, including funding for refugee children from Central America enrolling in U.S. schools by the tens of thousands, will further stress the already-controversial appropriations process.

In its remaining few months, the 113th Congress may take up other legislation as well. On the education front, only procedural hurdles remain to passage of the education research reauthorization (H.R. 4366) and child-care and development block-grant bills (S. 1086).

Both measures have been managed by retiring Senate Education Chairman Tom Harkin (D-Ia.) and House Education Chairman John Kline (R-Minn.), who may be subject in 2015 to a House Republican term-limitation on his chairmanship.

Second-term presidents are also considered lame ducks, since they cannot serve another term. The Obama



Administration, which has struggled politically under federal budget constraints since 2011 to fund its priority programs, is facing further complications due to its second-term status. As a result, the Administration has emphasized executive branch actions that do not need congressional concurrence.

However, the Education Department has not yet fully explored opportunities for executive action on such issues as local-level flexibility and regulatory reform that could

overcome inefficiencies in current federal education law and help improve program performance and practice.

Until the make-up of the 114th Congress is settled in November, nearly everything remains speculative. The constant clamoring of education interest groups to reauthorize their particular education programs, including elementary and secondary education, career and technical education, higher education, and the like, has not borne fruit in the 113th Congress and their efforts appear premature given the uncertain composition of the 114th.

Recent history suggests that even with strong bipartisan support for *No Child Left Behind* (NCLB) in 2001, Congress got most of the operational details wrong. In any case, the Senate and House leadership and the Committee Chairs on both sides will set their legislative agendas for the 114th Congress regardless of the predispositions of the education community.

It is certainly likely that the new Congress will want to reauthorize a number of overdue education laws. Whether the $114^{\rm th}$ Congress can actually write legislation that helps local school districts over and above the current framework of NCLB alongside flexibility waivers is still an open question.

OCTOBER 2014 INSIDE THE COUNCIL

Jackson School District Expands Male Mentoring Program

Mentor support continues to grow for males of color in Mississippi's Jackson Public Schools. The City of Jackson and the school district recently announced the expansion of the Ambassadors of the Evers Academy for African-American Males (A-TEAAM) mentoring program.

The mentorship program, named for slain civil-rights pioneer Medgar Evers, was launched last year at Blackburn Middle School, with the district receiving a grant for \$1,500 to provide mentorships to 40 students. An increase in organizations signing on to participate has spurred the program's growth to now include Hardy and Powell middle schools.

The goal of the A-TEAAM mentoring program is to improve the quality of life for young males of color by equipping them

with skills, knowledge, and support of caring mentors. Their interactions are guided by a meaningful curriculum designed to empower students as they navigate through middle school.

During a recent orientation ceremony to commemorate the program's launch, Jackson Schools Superintendent Cedrick Gray advised the mentorees to be aware that their roles as ambassadors come with a responsibility to others.

"These young men will be the drivers of the mission," said Gray, "to provide a better quality of life for the young black boys in the City of Jackson. 'Gentlemen, please don't take what you are doing for granted. You are embarking upon a journey that will forever set a precedent and a bar for other young men to rise to."



New Orleans Student Selected as National Poet

Madeleine LeCesne, second from left, a senior at Lusher Charter School in New Orleans, was among five students recently appointed as 2014 National Student Poets, the nation's highest honor for teen poets, with First Lady Michelle Obama hosting a poetry reading at the White House in their honor. The students were appointed by the President's Committee on the Arts and the Humanities and will serve a year as youth ambassadors for poetry, leading readings and workshops at libraries and schools across the country. The National Student Poets will each receive an academic award of \$5,000. Photo credit: Paul Morse for the National Student Poets Program

Urban Teachers Receive Yale U. Educator Award



Kevin Murchie

As an Advanced Placement English Language Arts teacher at Los Angeles' Garfield Senior High School, Kevin Murchie challenged his students to critically examine social issues

written in literary classics. As the newspaper faculty sponsor, Murchie also encouraged students to explore self-expression through their writing, especially student editor Janet Juarez.

For Juarez, a 2014 Garfield graduate who is currently a freshman at Yale University, Murchie's rigorous approach to educating his students played a critical role in shaping her future. As a result, she nominated Murchie for the 2014 Yale University Educator Award, and he won.

The Yale Educator Recognition Program honored 54 teachers and 30 counselors from around the world who support and inspire their students to achieve at high levels. Matriculating Yale students are invited to nominate high school educators, and a committee composed of Yale admissions officers review the nominations.

"Receiving this award, any award for that matter, for teaching is humbling," Murchie said. "...Teaching is, largely, a thankless profession... So, it is moments like this, when a young person feels compelled to tell you and others how important it all was and will be, that you made a difference in their lives, that makes it all worth it."

In addition to Murchie, big-city teachers and counselors from Anchorage, Austin, Houston, Los Angeles, New Orleans, Philadelphia, Oakland, San Diego and Tampa, Fla., were selected as 2014 recipients of the Yale University Educator Award.



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Students Learn Life Skills in Baltimore Bike Club

Just like at a typical bike repair shop, greasy hands fix flats and pry tires from frames, while badly broken bikes are completely taken apart and reassembled, and are now ready to ride. These bike enthusiasts are not only skilled at repairs, they also enjoy learning about bike safety and riding together – and they are all students at Baltimore City's Digital Harbor High School.

Located in the school's basement, Digital Harbor's bike club has about 20 members.

"It's life changing because the kids get to have hands-on, authentic learning," says Nicole Veltre, a science teacher at Digital Harbor, who helps the club.

Dallas Pre-K continued from page 9

round professional development training for teachers and administrators, expanding summer enrichment, and strengthening parent engagement with our community partners to reach children as early as birth.

"Investing in quality early education is the single best investment we can make for our kids," Cohen concludes.



Students in Baltimore's Digital Harbor High School repair a bicycle.

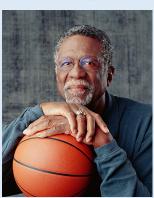
Three years ago, a local nonprofit, a Baltimore bike shop, and several of the school's police officers donated dozens of bikes to the school, but they were badly in need of repairs. The students asked a few community members to teach them how to fix the bikes, and within the next few months, the bike club was formed. One student recently landed a part-time job at a local bike shop.

Now the club sells some of the bikes they repair. All proceeds go back to the club – for more learning, riding, and fun.

"The club has become a really cool kidrun bike shop," said Veltre.

Great City Grads





Bill Russell

Retired Basketball Star 1952 Graduate McClymonds High School Oakland Unified School District



RESEARCH DEPARTMENT OVERVIEW



Research Department Overview October 2014

Overall Research Department Goals/Priorities

The goal of the research department is to conduct, facilitate and disseminate research that will provide guidance and support to the Council's member districts and other key stakeholders as they work to improve academic achievement and reduce achievement gaps in large urban school districts. The follow reports and presentations will be available on our Research Department webpage: http://www.cgcs.org/Research.

Update on New Projects

School Improvement Grant Analysis

Overview

In February 2012, the Council of the Great City Schools published a report on the rollout of the School Improvement Grant Awards (SIG) awards in Council districts and across the country in general. The Council is preparing a new report that serves as a follow-up to the Council's original work. The number of identified SIG eligible and award schools that were urban, poor, and enrolling high-minority populations were significantly higher than national averages. The SIG funding specifically targeted the low-achieving schools across the country and a number of schools in Council districts. The purpose of the study is to examine the trends in performance for schools across the country that received SIG awards as a part of the American Recovery and Reinvestment Act of 2009 (ARRA).

The report analyzes key performance indicators for schools receiving grant awards (SIG Award Schools) as compared to:

- 1) SIG Eligible Schools those schools deemed eligible to receive SIG awards, but not receiving any funding in Cohort 1 or Cohort 2 of the award cycle;
- 2) Non-SIG Eligible Schools those schools across the country not eligible to receive SIG funding due to higher levels of student achievement.

Update:

The council's research staff has conducted a qualitative analysis of selected school districts whose SIG eligible schools either showed improvement or a decline in their

assessment performance. The findings from the schools will be published in October 2014 and include an update of school performance from the 2012-2013 school year.

The Landscape of Student Assessments across CGCS Districts

Background

As our nation's urban schools prepare to roll out the Common Core State Standards assessments, discussions around the implementation challenges still remain a concern for our nation's school leaders. While many are in support of the new college and career-ready assessments, some are still hesitant about the current assessment practices and policies in our districts.

In October 2013, the Council's board of directors expressed those concerns with our research team and proposed an investigation into the current testing practices and policies within our schools. The board agreed that there is a critical need to provide clarity and draw on the lessons learned from test-based accountability. They requested that the Council's research team reach out to member districts to get a better understanding of the assessments currently in place, how those assessments are mandated, lessons learned from administering those assessments, and the purposes and uses of current assessments across districts.

In addition, the board was interested in understanding parent/community perspectives and their level of comfort with assessments. With the data collected from our member districts, the board suggested that the Council develop a guide for districts to develop a coherent approach to assessments, including the steps districts should employ for ensuring parents and the community understand the purpose and need for assessments.

<u>Purpose</u>

The purpose of this study is to gain a better understanding of how our districts are using their current assessments to better serve their students. This study will look into those policies and practices and how they compare to the implementation of common core assessments. The study hopes to answer the following questions:

- 1. What are the lessons learned from current assessment practices?
- 2. Who mandates current assessments?
- 3. What questions do current assessments answer? What questions are unanswered by current assessments?
- 4. How are these assessments different from Common Core assessments?

- 5. How are these assessments used for accountability, instruction, and/or sorting purposes?
- 6. What are parents' and community leaders' perspectives on assessments?

Proposed Study

As a first step, the council's research staff has conducted a comprehensive survey of member school districts regarding their planned assessment practices for the 2014-2015 academic year. Preliminary findings from the survey results will be published in October 2014.

The Research Team is currently compiling a list of school, district, state and national-level assessments and develop profiles of assessments across the following categories: 1) high school, 2) special education, 3) English language learners, 4) gifted students and 5) local, state and national system-wide assessments. The team will pull the data from various district and national websites and will also contact several districts to gain a better understanding of how assessments are used. Each profile will answer the critical questions provided in the "purpose of the study" section. In addition to the assessment profiles, the team will develop a comprehensive profile on three case study districts--Boston Public Schools, Fresno Unified School District and Chicago Public Schools. The comprehensive profile will take a further look into how these districts are using each of these assessments and what a typical assessment calendar for a student may look like.

Update on On-Going Projects

Beating the Odds XI (BTO): An Analyses of Urban Student Performance on State Assessments and NAEP

Overview

Beating the Odds annually documents and analyzes assessment and demographic data for each member district.

Update

The BTO XIII Executive Summary will be available in hard copy and online Winter 2014. The 2014 report includes assessment and demographic data from 2009-10 through 2012-13. Complete information with individual district profiles will also be available online on the Council's website.

Secondary NAEP Analysis

Overview

In an effort to provide additional guidance to Council districts as they begin to implement the Common Core State Standards, staff will conduct secondary analyses of NAEP data. This analysis will be broken down in two parts. First, our team will compare the performance of large cities (LC) and TUDA districts with their respective states on 2013 NAEP. This analysis will be unique, however, as it will remove the contribution of the LC and TUDA results from state estimates. Second, the research team will conduct an analysis similar to the *Pieces of the Puzzle Addendum* released in 2011 examining the performance of the 21 participating districts and their changes in student performance from 2009 to2013. The analyses will focus on how did each district performed:

- compared to the national public sample and the large city populations?
- compared to one another when we control for relevant student demographic background characteristics?
- compared to their expected performance based on relevant student demographic background characteristics?
- across mathematics and reading subscales?
- on selected items on the assessment?

Black Male Initiative

Overview

In October 2010, the Council of the Great City Schools released *A Call for Change*, which attempted to summarize our findings and the analyses of others on the social and educational factors shaping the outcomes of Black males in urban schools. *A Call for Change* documented the many challenges facing our Black male youth, and the Council's Board of Directors has agreed to move forward aggressively on solutions.

Update

Fall Pre-conference on Improving the Achievement of Young Men of Color. The Council hosted a meeting titled, United to Make a Difference: Improving the Achievement of Young Men of Color. The meeting allowed urban school district leaders share and refine their strategies for addressing the needs of young men of color in their school districts.

Webinars. The Council will host a series of webinars each month to highlight the solution briefs of each of our authors. The webinars will be an opportunity for leaders to have a dialogue with the authors. The first webinar was held on March 7, 2014 with Dr. Pedro Noguera. Each webinar will be archived on the Council's website.

Implementing the Common Core State Standards

Overview

The Council has received \$4.6 million grant from the Bill & Melinda Gates Foundation. The three-year grant is aimed at promoting and coordinating successful implementation of the new kindergarten to 12th-grade Common Core State Standards in English-language arts and mathematics in big-city public school systems nationwide.

<u>Update</u>

The Common Core State Standards Implementation Survey

In 2014, the Council administered the third annual Common Core Implementation Survey. Thirty-nine urban districts responded to the survey (a district response rate of 59 percent) and provided insight on districts' current progress and emerging challenges in implementing the Common Core State Standards. The results include responses from curriculum directors, research directors, ELL and special education directors, and communication directors. The survey asks questions related to district strategic planning, professional development activities, attention to specific student groups (including ELLs, students with special needs, and struggling students), data management, and communication with stakeholders.

Key findings include:

- The percentage of respondents who rated certified instructional personnel (i.e., certified teachers) as either "very prepared" or "somewhat prepared" increased from 30 percent to 39 percent, however, 61 percent still perceived this group as either "somewhat prepared" or "not very prepared" to implement the CCSS.
- Over three-fourths of respondents rated their district's progress as "excellent" or "good" in terms of providing professional development in ELA (80 percent) and Math (76 percent).
- The percentage of respondents who at least "somewhat agreed" with the statement that ESL teachers are prepared to ensure that ELLs are able to meet the rigor of the CCSS increased by 8 percentage points between 2013 and 2014.
- Approximately 82 percent of responding special education directors agree or strongly agree that their district is successful at identifying students with disabilities – an increase of 11 percentage points from 2013. However, approximately 55 percent of respondents agree or strongly agree that their district highly prioritizes ensuring that students with disabilities are able to meet the rigor of the CCSS – a decrease of 9 percentage points from 2013.
- Over the past two school years over 80 percent of research directors have rated their district's progress as either "excellent" or "good" in terms of providing timely access to data for school leaders (80 percent and 87 percent) and creating data systems to store information from multiple departments (95 percent and 88 percent).

PLEDGE ON MALES OF COLOR



A Pledge by America's Great City Schools

- Whereas, some 32 percent of the nation's African American males and some 39 percent of the nation's Hispanic males attend school each day in one of the Great City School systems; and
- Whereas, the academic achievement of Males of Color in the nation's urban school systems and nationally is well below what it needs to be for these young people to be successful in college and careers; and
- Whereas, disproportionate numbers of Males of Color drop out of urban schools and often have low attendance rates; and
- Whereas, Males of Color disproportionately attend under-resourced schools and are taught by the least-effective teachers; and
- Whereas, the nation's Great City Schools have an obligation to teach all students under their aegis to the highest academic standards and prepare them for successful participation in our nation:
- Be It Therefore Resolved that, the Great City Schools pledge to ensure that its pre-school efforts better serve Males of Color and their academic and social development, and
- That the Great City Schools will adopt and implement elementary and middle school efforts to increase the pipeline of Males of Color who are succeeding academically and socially in our urban schools and who are on track to succeed in high school, and
- That the Great City Schools will keep data and establish protocols that will allow it to monitor the progress of Males of Color and other students in our schools and appropriately intervene at the earliest warning signs; and
- That the Great City Schools will adopt and implement promising and proven approaches to reducing absenteeism, especially chronic absenteeism, among Males of Color, and
- That the Great City Schools will develop initiatives and regularly report on progress in retaining Males of Color in school and reducing disproportionate suspension and expulsion rates, and
- That the Great City Schools will develop initiatives and regularly report on progress in increasing the numbers of our Males of Color and other students participating in advanced placement and honors courses and gifted and talented programs, and
- That the Great City Schools will strongly encourage colleges of education to adopt curriculum that addresses the academic, cultural, and social needs of Males of Color, and that the district will maintain data on how these teachers do with our Males of Color, and
- That the Great City Schools will develop initiatives and regularly report on progress in increasing the numbers of Males of Color and other students who complete the FAFSA, and
- That the Great City Schools will work to reduce as appropriate the disproportionate numbers of Males
 of Color in special education courses, and

- That the Great City Schools will work to transform high schools with persistently low graduation rates among Males of Color and others and to provide literacy and engagement initiatives with parents.
- That the Great City Schools will engage in a broader discussion and examination of how issues of race, language, and culture affect the work of our district.

Council of the Great City Schools

Albuquerque Public Schools	Anchorage Public Schools
Atlanta Public Schools	Austin Public Schools
Baltimore City Public Schools	Birmingham Public Schools
Boston Public Schools	Bridgeport Public Schools
Broward County Public Schools	Buffalo Public Schools
Charlotte-Mecklenburg Public Schools	Chicago Public Schools
Cincinnati Public Schools	Clark County (Las Vegas) Public Schools
Cleveland Metropolitan School District	Columbus City School District
Dallas Independent School District	Dayton Public Schools
Denver Public Schools	Des Moines Public Schools
Detroit Public Schools	District of Columbia Public Schools
Duval County (Jacksonville) Public Schools	East Baton Rouge Parish School System
El Paso Independent School District	Fort Worth Independent School District
Fresno Unified School District	Guilford County (Greensboro) Public Schools
Hillsborough County (Tampa) Public Schools	Houston Independent School District
Indianapolis Public Schools	Jackson Public Schools
Jefferson County (Louisville) Public Schools	Kansas City (MO) Public Schools
Long Beach Unified School District	Los Angeles Unified School District
Miami-Dade County Public Schools	Milwaukee Public Schools
Minneapolis Public Schools	Nashville Public Schools
Newark Public Schools	Norfolk Public Schools

Oakland Unified School District	Oklahoma City Public Schools
Omaha Public Schools	Orange County (Orlando) Public Schools
Palm Beach School District	Philadelphia School District
Pittsburgh Public Schools	Portland Public Schools
Providence Public Schools	Richmond Public Schools
Rochester City School District	Sacramento City Unified School District
Saint Paul Public Schools	San Diego Unified School District
San Francisco Public Schools	Seattle Public Schools
Shelby County (Memphis) Public Schools	Toledo Public Schools

The White House

Office of the Press Secretary

For Immediate Release July 21, 2014

FACT SHEET: President Obama Applauds New Commitments in Support of the My Brother's Keeper Initiative

"That's what 'My Brother's Keeper' is all about. Helping more of our young people stay on track. Providing the support they need to think more broadly about their future. Building on what works – when it works, in those critical life-changing moments."

- President Barack Obama, February 27, 2014

In February, as part of his plan to make 2014 a year of action focused on expanding opportunity for all Americans, the President unveiled the "My Brother's Keeper" initiative to address persistent opportunity gaps faced by boys and young men of color and ensure that all young people can reach their full potential. As part of the initiative's launch, the President also established the My Brother's Keeper Task Force to review public and private sector programs, policies, and strategies and determine ways the Federal Government can better support these efforts, and how to better involve State and local officials, the private sector, and the philanthropic community.

Today, the President will announce new commitments in support of the My Brother's Keeper initiative at the Walker Jones Education Center in Washington, DC. Following the announcement, the President will hold a town hall session where he will take questions from the group of DC-area youth who will attend the event. During the session, the President will highlight how the My Brother's Keeper initiative and the Administration continue to work to build ladders of opportunity for all young people across the country. In attendance at the event will be leaders from 60-plus school districts across the country with the Council of the Great City Schools, parents, business leaders, athletes, mayors and members of Congress.

Today, Magic Johnson Enterprises' Earvin "Magic" Johnson and Deloitte CEO Joe Echevarria launched the National Convening Council ("NCC"), an independent private sector initiative bringing together leaders from business, philanthropy and the faith, youth and nonprofit communities. Over the next several months, the NCC will travel the country, lifting up examples of cross-sector efforts that are having a positive impact on boys and young men of color.

Creating Opportunity for All

For decades, opportunity has lagged for boys and young men of color. But across the country, communities are adopting approaches to help put these boys and young men on the path to success. And the President, joined by foundations, businesses, and many other leaders, wants to build on that success to ensure that all young people, including boys and young men of color, who are willing to work hard have an opportunity to get ahead and reach their full potential.

The My Brother's Keeper initiative encourages the use of proven tools that expand opportunity for young people, including access to basic health, nutrition, mentorship, high-quality early education and early introductions into the workforce, as well as partnering with communities and police to reduce violence and make our classrooms and streets safer.

On May 30th, the My Brother's Keeper Task Force released its 90-day report. This report includes key indicators that will provide a comprehensive view of the environments and outcomes for boys and young men of color and their peers. It also contains recommendations on steps our society can take to begin to expand opportunity for all in areas including:

- o Entering school ready to learn;
- o Reading at grade level by third grade;
- o Graduating from high school ready for college and career;
- o Completing post-secondary education or training;
- o Entering the workforce; and
- o Reducing violence and providing a second chance.

The Administration is doing its part by identifying programs and policies that work, and recommending action that will help all our young people succeed. Since the launch of My Brother's Keeper, the President's Task Force has met with and heard from thousands of Americans, through online and in-person listening sessions, who are already taking action.

New Commitments

Today, leading private sector organizations announced independent commitments that further the goals of the My Brother's Keeper initiative and directly address some of the key recommendations in the Task Force Report.

<u>Reducing High School Dropout Rates, Improving the Worst Performing Schools and Actively</u> Recruiting High Quality and Sustained Mentors:

• The NBA, the National Basketball Players Association (NBPA) and the National Basketball Retired Players Association (NBRPA) announced a five-year

commitment in partnership with MENTOR: The National Mentoring Partnership, Team Turnaround and the Council of the Great City Schools (CGCS).

- o Through the partnership, these organizations will support a public service announcement campaign designed to recruit 25,000 new mentors, with a specific emphasis on recruiting men of color.
- o The NBA and its teams will work with educators in at-risk schools across many of their franchise cities to provide incentive programs that increase attendance and improve overall school performance. Current and former NBA players will also participate in a series of grassroots, "lessons in leadership and teamwork" workshops in schools and after-school organizations that will inspire boys and young men of color to take charge of their lives, make good decisions, and be successful in their pursuit of education.
- AT&T announced an \$18 million commitment this year to support mentoring and other education programs with a mentoring component as part of the company's Aspire initiative a \$350 million commitment focused on high school success and workforce readiness for students at risk of dropping out of school.
 - o AT&T is launching the Aspire Mentoring Academy Corps, powered by AmeriCorps, AT&T and MENTOR: The National Mentoring Partnership to support AmeriCorps members in regions around the country and engage thousands of at-risk youth in mentoring activities.
 - o AT&T will expand the engagement of its employees through the Aspire Mentoring Academy with a goal to provide students who are at risk of dropping out of high school with 1 million hours of mentoring by the end of 2016.
 - o AT&T is using technology to scale its efforts through online mentoring, developing a mentoring app and piloting a program that mentors students through the CISCO IT certification process, thus developing critical Science, Technology, Engineering and Mathematics (STEM) skills.

Creating High Schools for the New Economy

- Along with their partners from Silicon Valley and elsewhere, the Emerson Collective, founded by Laurene Powell Jobs, will collaborate with districts and educators to launch a competition to find and develop the best designs for next generation high schools. Together, they will contribute \$50 million for this effort.
 - o Efforts will include connecting some of Silicon Valley's best innovators and design thinkers with some of the country's most effective and inventive educators and students to create schools for the new economy and provide models that can be adopted by other schools in the future.

o This school redesign initiative aims to use the best in design thinking, education research and practice and technology to create new school environments to dramatically increase the engagement and success of currently underserved students enabling them to achieve and compete at the highest levels and provide the supports, tools and resources educators need to be and feel engaged, effective and supported.

<u>Encouraging and Supporting Comprehensive Cradle-to-College-and-Career Community</u> Solutions for Youth:

- Today, the leaders of 60 of the largest urban school systems in the country with the
 Council of the Great City Schools, which collectively educate nearly three million of
 America's male students of color, have joined in an unprecedented pledge to change
 life outcomes of boys and young men of color by better serving these students at every
 stage of their education.
 - o Through an eleven-point plan that stretches from early childhood to graduation, these school districts will better support boys and young men of color by focusing on strategies with proven results. These include expanding access to high quality preschool, implementing or scaling early warning systems to prevent grade retention, establishing programs to reduce suspensions and expulsions, increasing access to advanced and rigorous coursework and ensuring increased FAFSA completion.

Expanding Access to Advanced Placement (AP) Courses and Rigorous College Prep:

- The College Board is investing over \$1.5 million for "All In", a national College Board program to ensure that 100% of African American, Latino, and Native American students with strong AP potential enroll in at least one matched AP class before graduation.
 - o As part of their "All In" commitment, the College Board is partnering with all 60 school superintendents who have signed on to the CGCS pledge to identify and reach out to young men of color who have demonstrated the potential to succeed in AP classes.

Creating Entry-Level Job, Mentorship and Apprenticeship Opportunities for Youth:

- Citi Foundation is making a three year, \$10 million commitment to create ServiceWorks, a groundbreaking, national program that uses volunteer services to help 25,000 young people in ten cities across the United States develop the skills they need to prepare for college and careers.
 - o The program, which will deploy 225 AmeriCorps members over three years, will engage youth, age 16-24, in service and build a large-scale volunteer response to the crisis of low college and career attainment. The young people in Boston, Chicago, Dallas, Los Angeles, Miami, New York, Newark, San

Francisco, St. Louis and Washington, D.C. – will receive training in critical 21st century leadership and workplace skills, the chance to build their networks and connections to their communities, and the opportunity to use their new skills by participating in and leading volunteer service projects.

o Thousands of professionals – including Citi employees – will participate as volunteer mentors and trainers.

Disproving the Negative Narrative:

- Discovery Communications will invest more than \$1 million to create an original independent special programming event to educate the public about issues related to boys and men of color and address negative public perceptions of them.
 - o The program will show specific youth stories and the interventions that made a difference in their lives as an illustration of ways to impact the future of boys and men of color. This 1-hour program will air across Discovery networks and is scheduled to air in 2015.
 - o Discovery Education will also host a series of screenings and town halls in partnership with community based non-profits to discuss "My Brother's Keeper" stories of intervention and ways that communities can get involved and help address this important issue facing our Nation.

<u>Building on Successful Evidence Based Programs that Recruit High Quality and Sustained</u> Mentors:

- Becoming A Man (B.A.M.) and Match tutoring programs announced \$10 million in new funding.
 - o The funding will support the expansion of B.A.M. and Match tutoring programs, in addition to supporting a large-scale study on the programs' long-term effects conducted by the University of Chicago Crime Lab and Urban Education Lab. B.A.M. is a mentoring and cognitive behavioral therapy program developed by the nonprofit organization Youth Guidance. Match is an intensive, individualized math tutoring intervention developed by Match Education.
 - o The commitment is made possible by the Eunice Kennedy Shriver National Institute of Child Health and Human Development of the National Institutes of Health, and Chicago Mayor Rahm Emanuel and the Chicago Public Schools.
 - o With this announcement, B.A.M. and Match are also committing to expand to 3-5 new cities over the next three years.

MBK Task Force Commitments

Through the MBK Task Force, a federal interagency working group created by Presidential Memorandum, the Departments of Justice (DOJ) and Agriculture (USDA), along with the Corporation for National and Community Service (CNCS) announced today two new youth corps programs to expand opportunities for youth. Both programs directly address recommendations in the Task Force Report. The programs are intended to help young people successfully enter the workforce as well as create additional job opportunities and increase entrylevel job, mentorship and apprenticeship options for all young people, including boys and young men of color.

Supporting Disconnected Youth Through Service and Engagement:

- CNCS and the DOJ's Office of Juvenile Justice and Delinquency Prevention (OJJDP) today announced a jointly funded AmeriCorps program called Youth Opportunity AmeriCorps.
 - o The program, which totals up to \$10 million over three years, will enroll disconnected youth in national service programs as AmeriCorps members over the next 3 years. It includes a mentorship component, in which grantees will provide mentoring support to the AmeriCorps members.

Providing Opportunities that Build Early Career Skills:

- USDA and AmeriCorps today announced a landmark new partnership between AmeriCorps and the USDA's Forest Service, which connects youth with service opportunities to restore the nation's forests and grasslands.
 - o The \$3.8 million joint funding will provide resources for both AmeriCorps grantees and member organizations of the 21st Century Conservation Service Corps (21CSC), and will also provide for 300 new AmeriCorps members serving in U.S. Forests.

Previous Private Sector Commitments

- In June 2014, eleven of the nation's leading philanthropies announced a \$194 million investment in initiatives to expand opportunity for boys and young men of color.
- In June 2014, **UBS America** announced a five-year, \$10 million commitment to establish a new education platform for improving college success among under-resourced populations. Commencing in three markets New York, New Jersey and Connecticut with an intensive program focused on young men of color, **UBS NextGen Leaders** aims to empower students with the skills, knowledge and experience needed to succeed in college and compete in the global marketplace.
- In June 2014, **JPMorgan Chase & Co.** launched the expansion of "The Fellowship Initiative: Expanding the Horizons of Young Men of Color," to provide boys and young men of color with long-term fellowships and pathways to jobs. The program

youth.			

involves a \$10 million commitment to expand the effort to three cities serving nearly 200

JOINT TESTING STATEMENT





Commitments from CCSSO and CGCS on High-Quality Assessments

October 15, 2014

As leaders of state school systems and the nation's largest city school districts, we know assessments are a necessary part of education to help improve learning for every child. High-quality assessments provide an academic checkup so students, parents, and educators understand how each child is progressing toward goals, regardless of race, income, or language. Without assessments given at least once a year, educational leaders would not have the information they need to know about who is learning, and who is not. We use tests – at the classroom, school, district and state levels – to make critical decisions about instruction, additional assistance, advanced opportunities, and policies.

The Council of Chief State School Officers and the Council of the Great City Schools believe that assessments should be guided by the following principles:

- Assessments should be high quality. We cannot waste student or teacher time with low-quality tests. Assessments must be aligned with college- and career-ready standards. Assessments must measure students' abilities to think critically, synthesize material from multiple sources, analyze problems, and explain and justify responses.
- Assessments should be part of a coherent system. Assessments should complement each other in a way that defines a coherent system of measures. Assessments should be administered in only the numbers and duration that will give us the information that is needed and nothing more. Multiple assessments of the same students for similar purposes should be minimized or eliminated.
- Assessments should be meaningful. Assessments are critical to improving instructional practice in the classroom and to helping parents make decisions. Therefore, the results of assessments should be timely, transparent, disaggregated, and easily accessible to students, parents, teachers and the public so they can interpret and analyze results, as needed.

Based on these principles, we as chief state school officers and district superintendents and school board members have taken initial steps to ensure assessments are used in responsible ways. Last year, CCSSO, on behalf of member states, published the *High-Quality Summative Assessment Principles* for states to hold themselves and their assessments accountable for high quality. State chiefs have embraced these principles and are moving toward next-generation assessments. Several member states took additional steps to comprehensively review their state assessment systems and make sure every test is in the best interest of students and teachers.

At a local level, the Council of the Great City Schools is taking similar actions. The CGCS has conducted a comprehensive inventory of tests across its membership and is compiling case studies at the school level to gauge the amount of school-based testing and "test prep" time.

As leaders in education, we also understand the importance of continuous improvement, especially when it comes to assessing academic progress. To that end, states and large-city school districts announce today that we will work in tandem to continually improve assessments and assessment systems at state and local levels, based on our guiding principles, so every assessment improves decision-making, bolsters the capacity of our educators to provide the highest quality instruction, and ensures every student is on target for college- and career-readiness. These efforts must occur not only at the state and district level but also at the national level, school level, and in our classrooms if we are to strike the right balance between instruction and assessment.

Today, we announce our commitment to the following efforts:

State School Chiefs will:

- Increase the transparency of the state assessment system by publishing an easily accessible list of all state assessments.
- Evaluate the state's assessment system for quality and coherence.
- Work with educational stakeholders to eliminate redundant assessments.
- Partner with school districts to review their benchmark and formative assessments.

Large City School Districts will:

- Review the entire array of assessments administered in our districts to determine alignment, appropriateness, and technical quality.
- Name and convene a special task force to review the findings from the comprehensive survey of district testing and make recommendations for improvement.
- Streamline or eliminate assessments that are found to be of low quality, redundant, or inappropriately used.
- Ensure greater transparency in our portfolio of assessments and what the results mean for students and parents.
- Improve the use of assessment results to enhance classroom instruction, and curtail counterproductive "test prep" practices.
- Report the results of our efforts to the public.

THE WHITE HOUSE Office of the Press Secretary

FOR IMMEDIATE RELEASE October 15, 2014

Statement by the President on Local Education Leaders' Action on Standardized Testing

Over the past five years, my Administration has worked with states to remove obstacles created by unworkable requirements of the No Child Left Behind Act. While the goals behind No Child Left Behind – promoting school accountability and closing the achievement gap – were admirable, in too many cases the law created conditions that failed to give our young people the fair shot at success they deserve. Too many states felt they had no choice but to lower their standards and emphasize punishing failure more than rewarding success. Too many teachers felt they had no choice but to teach to the test.

That's why my Administration has given states that have set higher, more honest standards the flexibility to meet them. In that spirit of flexibility, I welcome today's announcement from the Council of Chief State School Officers and the Council of the Great City Schools that state education chiefs and district superintendents will work together to cut back on unnecessary testing and test preparation, while promoting the smarter use of tests that measure real student learning. I have directed Secretary Duncan to support states and school districts in the effort to improve assessment of student learning so that parents and teachers have the information they need, that classroom time is used wisely, and assessments are one part of fair evaluation of teachers and accountability for schools.

In the 21st century economy, a world-class education is more important than ever. We should be preparing every child for success, because the countries that out-educate us today will out-compete us tomorrow. Our nation's schools are on the right track: Our high school graduation rate is at its highest in our history, the dropout rate is the lowest on record, and more of our young people are earning college degrees than ever before. I'm determined to support our nation's educators and families as they work to set high expectations for our students and for the schools in which they learn.

WORKING GROUPS PROJECT

IMPLEMENTING COMMON CORE ASSESSMENTS:



September 2014Council of the Great City Schools



IMPLEMENTING COMMON CORE ASSESSMENTS:

Challenges and Recommendations





Working Draft

SEPTEMBER 2014
COUNCIL OF THE GREAT CITY SCHOOLS

Implementing Common Core Assessments

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Counc	cil of the Great City Schools

Implementing Common Core Assessments: Challenges and Recommendations

By the Council of the Great City Schools

Introduction

The United States is transforming how it assesses the academic attainment of its schoolchildren. These changes will come, in part, with the implementation of the new Partnership for Assessment of Readiness for College and Careers (PARCC) and Smarter Balanced Assessment Consortia (SBAC) assessments in the spring of 2015, as well as other assessments developed by individual states to measure student performance on the Common Core State Standards or other college- and career-readiness benchmarks.

These tests—selected by the states—will replace the disparate collection of assessments that many states independently develop, administer, and score, and they will give the country a clearer sense of how our children are performing across jurisdictions and compared to students in other countries. Except for the National Assessment of Educational Progress (NAEP), nothing like a common set of academic standards and assessments has existed in the United States until now.

The assessments will also be different from anything the United States has done before for another reason. The state assessments that currently exist grew largely from requirements by the federal Elementary and Secondary Education Act of 1994 and the No Child Left Behind Act of 2002, and were meant to be inexpensive and quickly scored. The result was that, in some cases, many of these exams used rather simplistic, multiple-choice questions where students could pick the correct answer from among a number of options.

In contrast, while the new PARCC and SBAC assessments in English language arts will retain some multiple-choice selections, students will also be asked to read from multiple challenging texts, construct both short and extended responses citing information and evidence from those texts, and justify their responses. In math, students will be asked to apply their understanding of key concepts, solve more complicated, multi-step problems, and explain their reasoning.

In addition to the assessments being different for students, their administration will present a number of challenges for school administrators and teachers: (1) Administrators will need to put technology in place for students to access and take the assessments, (2) they will need to create a test-taking schedule based on both technology and human resources and enlist teachers and administrators to supervise the assessments in ways that are different from current assessments, and (3) they will need to explain the results to a public that will not be used to seeing test scores that appear so low—at least initially.

For their part, teachers will be asked to fundamentally shift their instruction in order to equip students with a deeper understanding of content, critical reading and problem-solving skills, and the ability to demonstrate and apply their knowledge in novel ways.¹

It will be important for school districts to ensure the smoothest and most effective possible implementation of these assessments. All school systems and schools want to make sure that students have the best possible experience as their learning is being assessed. In addition, school systems, administrators, and teachers will want to make sure that they are getting the most accurate information possible from the assessments in order to improve programming and instruction.

The purpose of this booklet is to help school districts across the country, particularly those in our major cities, get ready for these assessments. The booklet will briefly summarize important features of both major common core assessments—PARCC and SBAC—outline major challenges that school districts will need to attend to when planning for these assessments, and present proposals and recommendations to school districts to help them in the planning process.

There is a great deal at stake in making sure that the new assessments are administered properly and effectively. Smooth implementation of the assessments will help build the public's confidence that the nation's movement toward the Common Core State Standards is a step in the right direction. Conversely, a rocky implementation could be used to fuel opposition to the new standards and undermine their political viability—in common core and non-common core states alike.

This risk is particularly high in America's Great City Schools. The press is located in our cities and they will look at our schools first in judging whether implementation nationwide is going well. In addition, administration is more complicated in our city school districts because of the sheer scale of operations. Getting these assessments right is critical to our students, to the future of the standards, and to the public's view of our schools. This booklet is meant to help ensure success.

Summary of the PARCC and SBAC Assessments

PARCC and SBAC are the two state-led assessment organizations established with funds from the federal Race-to-the-Top program to develop and implement tests aligned to the Common Core State Standards. The following briefing describes the two assessment systems.²

PARCC. The purpose of the PARCC assessment system is to increase the rates at which students graduate from high school prepared for success in college and the workplace. It is

¹ See *Beyond Test Scores: What NAEP Results Tell Us About Implementing the Common Core in Our Classrooms.* Washington, D.C.: Council of the Great City Schools, 2014.

² Source: Coming Together to Raise Achievement: New Assessments for the Common Core State Standards. Center for K-12 Assessment & Performance Management at ETS, Updated March 2014, page 6.

based on the core belief that assessments should be a tool for enhancing teaching and learning. The state-led PARCC consortium intends for the assessments to help educators increase student learning by providing timely, concrete data throughout the school year to inform instruction, interventions, and professional development as well as to improve teacher, school, and system effectiveness.

The system of aligned diagnostic, interim, and summative assessments is being designed to provide valid, reliable, and timely data; provide feedback on student performance; help determine whether students are college- and career-ready or on track; support the needs of educators in the classroom; and provide data for accountability, including measures of growth.

The PARCC assessment system will consist of five components: a required two-part computer-based summative assessment (a performance-based assessment and an end-of-year assessment); two optional components (a diagnostic assessment and a midyear assessment); and one required non-summative assessment in speaking and listening.

Teachers will have access to an online repository of resources being developed by PARCC, culled from the best products from member states, and professional development modules to support implementation and use of the assessment system. A web-based reporting system is expected to provide teachers, students, parents, and administrators with timely, user-appropriate information about the progress and instructional needs of students.

PARCC will leverage technology across the design and delivery of the system to support student engagement, innovation, accessibility, cost efficiency, and the rapid return of results. (For additional information on PARCC, see the "frequently asked questions" section in the appendix of this report.)

SBAC. The state-led Smarter Balanced Assessment Consortium (SBAC) is expected to be fully functional by the 2014-15 school year.³ This comprehensive system has been designed to strategically "balance" summative, interim, and formative assessments through an integrated system of standards, assessments, instruction, and teacher development, while providing accurate year-to-year indicators of students' progress toward college and career readiness.

Two of the system's three components—the year-end summative assessment and the interim assessments available throughout the year—will contain multiple item types, including scenario-based performance tasks. The third component—a web-based set of formative tools and resources—is an instructional resource that will support teachers with their day-to-day, classroom-based assessment activities.

All components will be fully aligned with the Common Core State Standards and will draw upon research-based learning progressions that further define how students acquire the knowledge and skills called for in the standards.

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³ Source: Coming Together to Raise Achievement: New Assessments for the Common Core State Standards. Center for K-12 Assessment & Performance Management at ETS, Updated March 2014, page 17.

A foundational feature of both the year-end summative assessments and the interim assessment system is that computer adaptive testing will be used to minimize testing time, assure broader coverage of common core standards, and provide greater score precision, particularly for students toward the high or low end of the performance spectrum.

Teachers will have access to an optional suite of online resources and tools to help them provide high-quality instruction using formative assessment processes. Through an interactive electronic platform, Smarter Balanced will provide both standardized and customized reports that can be targeted to a range of audiences for tracking, describing, and analyzing progress. (For additional information on SBAC, see the "frequently asked questions" section in the appendix of this report.)

A guiding principle for states in Smarter Balanced is "responsible flexibility." The Consortium will make it possible for states to customize system components, while also ensuring comparability of student scores across all participating states on the summative assessments. Exhibit 1 on the next page summarizes and compares the critical features of both testing systems.

Exhibit 1. Key Similarities and Differences of the Comprehensive Assessment Consortia

PARCC	SBAC	
	·	
Major Similarities Summative Assessments		
Summative Assessments		
Online assessments for grades 3-8 and high	Online assessments for grades 3-8 and high	
school, ELA and mathematics	school, ELA and mathematics	
Uses a mix of item types, including selected	Uses a mix of item types, including selected	
response, constructed response, technology	response, constructed response, technology	
enhanced, and complex performance tasks	enhanced, and complex performance tasks	
Heating common anta hath since during the final	Has true commonants hath sives design the final	
Has two components, both given during the final	Has two components, both given during the final	
weeks of the school year	weeks of the school year	
Uses both electronic and human scoring	Uses both electronic and human scoring	
Oses both electronic and numan scoring	eses both electronic and naman scoring	
Is delivered and supported on computers, laptops,	Delivery supported on computers, laptops, and	
and tablets and a limited variety of operating	tablets and a limited variety of operating systems.	
systems.		
Other Assessments, Resources, and Tools		
Has online practice tests by grade and subject	Has online practice tests by grade and subject	
Thas offine practice tests by grade and subject	Thas online practice tests by grade and subject	
Has optional diagnostic and interim assessments	Has optional diagnostic and interim assessments	
	1 0	
Has professional development modules	Has professional development modules	

Has formative items and tasks for classroom use	Has formative items and tasks for classroom use	
Has an online reporting suite	Has an online reporting suite	
Has an online reporting suite	Has an online reporting suite	
Has a digital library for sharing vetted resources	Has a digital library for sharing vetted resources	
and tools	and tools	
Maintains state ownership and control of student	Maintains state ownership and control of student	
data, like current state assessments	data, like current state assessments	
	Major Differences	
Summative Assessments for Accountability		
Has summative assessments for grades 3-11	Has summative assessments for grades 3-8 and	
3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3	11 (states can add grades 9, 10, and/or 12 at an	
	additional cost per student tested)	
	* ′	
End-of-year test: Fixed-form delivery, i.e.,	End of year test: Adaptive delivery, i.e., students	
students take one of several equated sets of items	see an individually tailored set of items and tasks	
and tasks		

PARCC	SBAC
Performance-based assessment: Three ELA performance tasks and one or more mathematics tasks	Performance tasks: One ELA performance task and one mathematics performance task
Reporting results: Student results will be reported as one of five performance levels	Reporting results: Student achievement will be reported as one of four achievement levels
Language translations to be provided at additional cost	Language translation provided at no additional cost in Spanish, Vietnamese, Arabic, Tagalog, Ilokana, Cantonese, Mandarin, Korean, Punjabi, Russian, and Ukranian
One retake opportunity for grades 3-8 and up to three for high school, with state approval	One retake opportunity, but only for instances of a test administration irregularity
Estimated total testing time for combined ELA and mathematics, spread over nine testing sessions:	Estimated total testing time ⁴ for combined ELA and mathematics, spread over several testing sessions over several days
• Grade 3 8 hours	• Grades 3-57 hours
• Grade 3	•
• Grades 6-8	• Grades 6-87 hours 30 minutes
• Grades 9-10 9 hours 45 minutes	•
• Grade 11 9 hours 55 minutes	• Grade 11 8 hours 30 minutes
Paper and pencil version available as accommodation for the 2014-15 school year for schools approved by their state	Paper and pencil version available as an accommodation for three years for schools not ready for online delivery
Assessment Delivery	
States and districts select from a set of four-week testing windows, one for the performance-based assessments and one for the end-of-year assessments	States establish one 12-week testing window for grades 3-8 and one 7-week testing window for grade 11 for summative assessments
A vendor delivery platform will be used through 2014-15 (TESTNAV), after which a PARCC-developed, open-source or fully documented delivery system will be available to member states and their contractors	An open source delivery system is being developed and will be made freely available to states and vendors for delivery of SBAC assessments and other assessment applications
All system components delivered and operational in the 2014-15 school, except for K-1 formative	All system components delivered and operational in the 2014-15 school year

 $^{^{\}rm 4}$ The summative assessments are untimed, so estimates are descriptive only.

PARCC	SBAC
tools, diagnostic assessments, speaking/listening assessment, and PARCC test delivery platform	
Other Assessments, Resources and Tools	
A diagnostic assessment (grades 2-8) and a mid- year assessment (grades 3-11), with the latter made up primarily of tasks similar to the summative performance-based tasks (optional use)	Interim assessments for grades 3-8 and 11 (optional) will be computer adaptive and include multiple item types, including performance tasks. The number, timing, and scope (all standards or clusters of standards) can be locally determined. Item bank can be accessed by educators for instructional and professional development uses (optional use).
A speaking and listening assessment for grades K-12 (required for grades 3-8 and high school but not used for accountability)	No speaking and listening assessment
K-1 formative performance tasks (optional use)	Exemplar instructional modules, three per grade level in ELA/literacy and mathematics, with teacher training resources; additional instructional resources submitted by educators that meet quality criteria.
(Future) item bank with released summative items and tasks	
State-developed formative and diagnostic tools will be added to the Partnership Resource Center	Formative tools, processes, and practices available in digital library
Sustainability Model	
Independent non-profit organization governed by chief school officers of PARCC states, PARCC Inc.	Affiliation being established with CRESST at UCLA
Costs	
\$29.50 per student for summative assessments in 2014-15 includes centralized delivery and scoring	\$22.50 per student for summative assessments in 2014-15 includes estimated costs for state-determined delivery and scoring
Costs of additional resources to be announced Source: Key Similarities and Differences of the Compres	Additional \$4.80 per student annually for optional resources

Source: Key Similarities and Differences of the Comprehensive Assessment Consortia. K-12 Center at ETS, updated March 2014, pages 29-30.

Challenges in Implementing the New Assessments

School districts across the country, particularly major urban school districts, will face a number of critical challenges this new school year as they implement PARCC, SBAC, and other state-defined college- and career-ready assessments. These challenges fall into five broad areas: leadership and politics; academic preparation; assessment planning, logistics, and sustainability; technology; and strategic communications. For a successful implementation, school district personnel will need to attend to all of them. This section describes those challenges, and the subsequent section will present recommendations for addressing them.

A. Leadership and Political Challenges

The most immediate and overarching challenges facing school systems are the need for district leaders to make implementation of the new assessments a major priority for the district and the need to constructively address the range of political challenges that will inevitably arise. Leadership and political challenges that school districts will need to be aware of include the following—

- High-level Strategic Vision. The foremost challenge that will present itself to school districts involves how well states and their school districts have envisioned what a successful implementation looks like. How well has that vision been articulated by the state and understood by local school districts? Is there a common strategy for implementation across the state and within the district? Does everyone have a clear understanding of what that strategy is and what the benchmarks are for pursuing the strategy?
- *District Priority*. A related challenge facing school districts is whether their leadership views effective implementation of the assessments as a major priority. Are the superintendent and school board communicating the importance of both the new tests and a smooth implementation to everyone in the district and the community? Are they deploying the personnel, resources, time, and monitoring necessary to signal to everyone that this is a priority?
- An Overarching Plan. A major challenge for school districts in the implementation of the new assessments will involve the development of a comprehensive plan to guide their work. Has the district plotted out the work it needs to accomplish in order to have a smooth and effective roll-out of the assessments? Is this plan comprehensive, well integrated, and coordinated? Has it articulated the roles and responsibilities of key staff, as well as the importance of full organizational participation? Does it clearly lay out procedures, tools, and ultimate outcomes? Has this plan been communicated widely and understood clearly throughout the district?
- Staff Communication and Collaboration. It will also be vital to break down the silos that often define district central offices and to ensure cross-departmental collaboration in the implementation of the new standards and assessments. To undertake such a dramatic shift in teaching and learning, staff will need to communicate and work together closely to ensure that schools are provided with consistent and comprehensive support, resources,

and guidance. Staff and teachers will also need to be trained on how to communicate with parents and community members since research shows that most parents prefer to receive information about schools from teachers rather than from other parents.

- Change Management. A fifth major challenge is the need to effectively manage the changes associated with the new assessments. Do parents, teachers, school-based staff, and district-level personnel understand what the changes are and the implications of the new approach to both instruction and assessment? Do staff and parents understand why these changes are being made? Do school personnel and community members understand and embrace their roles in the change process?
- Community and Staff Engagement. A related issue facing school districts in the implementation of the new assessments is whether the community, parents, school staff, and other stakeholders feel engaged in the process of putting the assessments in place and feel a sense of ownership for how well it is done. Has the district effectively communicated with the community, parents, and staff about the standards and assessments and their implications?
- Press and Media Scrutiny. The Great Cities are home to the nation's media and major newspapers, radio, and television stations. Many of these outlets will be looking for concrete examples of how implementation is going—and opponents of the standards are likely to look specifically for examples of school and district missteps to bolster their claims that the new benchmarks are a boondoggle. This is more than a communications challenge to school districts; it is a strategic and political challenge as well. (See section on communications challenges for further discussion.)
- Political Opposition. As test-time approaches, the level of political rhetoric about the assessments is likely to intensify. A large part of this will be outside the school district's control, but districts need to be mindful of it and of how their implementation feeds the political rhetoric. There are vocal opponents of the standards and the assessments—from the political right and left—that would like to block implementation or see it go badly. Is the school system cognizant of where this opposition is likely to come from and what their best arguments are? Is the district prepared to address them? How well has this messaging been coordinated with local political and business leaders, other school districts, and allies?
- Parental Concerns over Testing Time and Difficulty. In addition to challenges from
 various political and ideological forces, parents and others may raise concerns about the
 length and difficulty of the new assessments. This may be particularly true in school
 districts whose states have chosen to participate in PARCC. School districts are not fully
 in control of this situation, but they may be the victims of parent pushback. Districts will
 need to consider how they conduct outreach and constructively address parental concerns
 about test-taking time or difficulty.
- Lower Test Scores. Student scores on the new assessments are likely to appear much lower to parents and the public than the results of previous assessments. Is the school system prepared to explain why this is occurring and what it means and doesn't mean? Is

there a plan in place for communication and outreach to the public? (See section on communications challenges.)

- Other Tests Given by the District and Required by the State. Compounding the challenge of explaining the time students will spend taking the new test is the fact that some states will be giving both PARCC or SBAC and their old summative assessments—or parts of the old assessments—in school year 2014-15. This is likely to be a temporary situation, but it will not make sense to a lot of people. Are the state and the school system being clear with the public and the press about how these assessments are being sequenced? In addition, districts will be faced with the challenge of articulating how the new assessments fit into the broader testing portfolio of the school system.
- *Teacher Organization Concerns*. Some teacher organizations—national, state, and local—have expressed concerns about the use of assessment results and the amount of testing in general. Some of these concerns are well grounded but others are not. How has the school district addressed these concerns with teachers, their organizations, and the parents who listen to them?
- Decentralization and Non-standardization. Many school districts have decentralized and non-standardized approaches to technology budgeting. The result may be an uneven need for devices from school to school depending on the leadership of the principals and their investments in technology. The district may face circumstances where it may be appearing to reward schools for not keeping up to date if the central office makes purchases in support of the new testing. In addition, the lack of standards in purchasing across schools may result in widely different technology without a central understanding of computing capacity to support the testing.

B. Academic Challenges of Preparing Students and Teachers

Successful implementation of the assessments will require more than administering the tests effectively or securing public support and buy-in. It also means ensuring that students are prepared to do well on the new tests. And it means ensuring that classroom teachers are prepared to modify their instruction to meet the new standards. These may be the most difficult and long-term implementation challenges that school districts will face with the new assessments. Academic and instructional challenges that school districts will need to address include—

- Expectations of Students and Their Work. A major challenge to the successful implementation of the new assessments involves adult belief systems in what students can do. Many staff members and teachers will be tempted to claim that the tests are too hard and that students are incapable of meeting the new standards and doing well on the new assessments. The district's ability to infuse high expectations and necessary supports into the implementation of the assessments will be critical to their success—and to the success of students.
- Preparing Students to Meet Higher Learning Standards. Preparing for new assessments aligned to the common core standards will involve clarifying why the changes conveyed in the new standards are being made, what they entail at each grade level, and what their

implementation will look like in classrooms. In addition, teachers will need the time and opportunity to plan for and practice implementing the instructional shifts prescribed in the new standards. Do teachers know how to build and enhance complex language skills and vocabulary among their students? Do teachers and principals know what to look for in student work to determine whether students are making progress developing these skills? Do students have access to complex texts, and are teachers prepared to use such texts to advance learning? Do teachers know how to develop and use text-dependent questions that require students to explain their answers and apply their skills? Are students grappling with ideas, growing in their knowledge, working and conversing with their peers, presenting evidence and justifying their reasoning, being expansive in their responses, and applying their skills to concrete problems? Do teachers have effective strategies to help students fill in gaps in their learning while working on grade-level requirements?

- Preparing Students to Meet Higher Assessment Standards. Many students are used only to seeing assessment items on their annual state tests or end-of-course tests that are multiple choice and do not require them to explain their answers or perform a task. An immediate challenge that students will have relates to preparing them and their teachers for the differing formats in which questions may be asked, in contrast to previous state tests. Part of this challenge will involve preparing students to tackle multi-step problems that require them to struggle over an extended period with how to apply a concept they have learned and to write out an explanation of their reasoning. No longer will teachers be asking questions that require students to give one-sentence responses; students will be asked to generate thoughts, justify their thinking, and cite evidence. In addition, the challenge in preparing students will involve having teachers develop and regularly use these types of complex, multi-layered questions in their own classroom work and quizzes rather than using test-preparation worksheets.
- Differentiating Student Preparation. Students of differing needs will also present a diversity of challenges to school districts as they implement the new standards and assessments. Students who are learning English as their second language, for instance, may require additional instruction and support on mathematical vocabulary to understand precisely what is being asked of them in math items, and they will need the language skills and grasp of English conventions to effectively communicate their answers. Similarly, students with disabilities will require special preparation, depending on the disability, well beyond what their accommodations specify. In fact, a wide range of students will present unique challenges —students who are eligible for a free or reduced price meal; struggling learners in either reading or math; students who are chronically absent from school or are highly mobile; male students, particularly males of color; Students with Interrupted Formal Education (SIFE); gifted and talented students; and students who are encountering the new standards and assessments at the mid-point in their school career.
- Revisiting and Updating the Curriculum. School districts should continue to design and, where necessary, rework or restructure their formal curricula or scope and sequence documents to ensure alignment with the common core and other college- and career-ready standards. But these materials need not only align with the standards; they also

need to provide concrete, accessible guidance for classroom instruction and should embed technology in their use. This is critical for ensuring that the standards are well implemented at the ground level and that students have access to the instruction they need to do well on the assessments.

- Securing High-Quality and Aligned Instructional Materials and Texts. This challenge is a particularly difficult one for most school systems because of the relentless salesmanship facing staff members who make purchasing decisions. Many publishers claim that their materials, texts, and tools are fully aligned to the common core and other college- and career- readiness standards. This claim is rarely true, so district leaders face the challenge of making such determinations themselves. Has the district reviewed its materials and other instructional tools and guidelines to ensure alignment with the standards? Has the school district offered adequate professional development on the use of those materials and tools? In addition, a major challenge facing district implementation of the standards and the assessments will involve ensuring that the materials, texts, and supports are appropriate for the district's varying subgroups, i.e., English language learners, students with disabilities, and struggling learners.
- Overseeing and Monitoring Implementation. Effective implementation of the standards will also involve the challenge of ensuring that they are being put into place as the district's leadership intended. How does the district monitor implementation, and how does it know when it is off-track? Has the district developed indicators of successful implementation at the systems, school, and classroom levels? Has the district developed or adopted instructional rounds or look-for protocols that will ensure that the expected instructional shifts are being carried out in classrooms? Do all instructional staff understand the protocols? Does the district have a feedback loop in place by which it can quickly identify and resolve implementation problems?
- Professional Development. This challenge is a multifaceted one and involves going well beyond familiarizing teachers with "what" the standards are to preparing them on "how" to implement them in their classrooms. Has the district defined what professional development is needed to adequately prepare teachers to make the instructional shifts called for in the standards? How has the district changed the focus of its professional development to focus on new academic needs? Has the district put into place appropriate mechanisms to promote teacher use of the standards, student work samples and artifacts, and released items from PARCC and SBAC. (Are they being used by teachers in their professional learning communities and common planning time?) Are teachers using the time to modify their instruction and co-construct lessons that are consistent with the new standards? Is the work embedded in ongoing teacher development? Is it articulated across grades and content areas? Moreover, will the professional development cover use of the technology being deployed to administer the new assessments, e.g., item types, keyboarding skills, drag and drop?
- *Differentiating Teacher Preparation*. Another issue confronting school districts as they implement the new assessments will involve differentiating professional development according to the experience and expertise of teachers. New teachers may have substantially different needs than mid-career teachers and teachers near retirement—even

if they are implementing the same standards and assessments. In addition, elementary and secondary-level teachers will all require differing kinds of preparation for the new assessments. Reading teachers will need preparation that differs from the preparation of math teachers. Moreover, almost all teachers will have English language learners and students with disabilities in their classes who will require differentiated instruction. And teachers in subjects other than reading and mathematics, particularly science and social studies, will require additional preparation on how to build the standards into their respective subject areas.

• *Pre-service Preparation*. While it may not be feasible for school districts to address this challenge in the 2014-15 school year, over the long run they will face the challenge of whether or not the universities and colleges of education preparing our future teachers are doing so with the new standards and assessments in mind.

C. Operational Challenges

In addition to challenges of leadership, politics, and the academic preparation of students, school districts will be faced with a host of logistical and operational challenges in the implementation of the new assessments. Short- and long-term challenges that school districts will need to address include—

Assessment Systems and Policies

- Streamlining Systems of Assessment. School districts nationwide test students extensively. Unfortunately, many of these assessments were designed well before the common core and other college- and career-ready standards were in place, and they do not necessarily align with the new standards. In addition, many school systems administer tests that have fundamentally similar purposes and are sometimes redundant. One of the fundamental challenges presented by the new assessments involves building a system of tests that fit together and are appropriately aligned with the expectations that the new standards are setting. This challenge will exist in the 2014-15 school year and beyond. Finally, school systems will face the challenge of deciding upon and implementing interim or benchmark assessments and ensuring that they fit with the summative assessments they will be giving.
- Test Administration Guidelines. School districts will also face challenges associated with needing to develop their own test-administration guidelines to accompany and supplement those provided by the states and the test vendors. These may need to include which portions of the day will be devoted to testing, which testing segments can be given when, etc. The district will also need to make decisions about the use of paper-pencil test administration—under what conditions and circumstances, how accommodations are applied, and who approves them.
- Accommodations. Another challenge facing school districts with the new assessments
 relates to accommodations for English language learners and students with disabilities.
 These accommodations may be different from the ones that previous state assessments
 included. School districts will need to ensure that each student needing accommodations

- gets the appropriate set when taking their technology-based assessments, something that may be difficult if the tests are not proctored by a student's teachers.
- *Use of Data*. Districts will also face the challenge of what to do with the data that the new assessments generate. Staff members will need to think about this before the assessments are actually administered. How will the assessment results be disaggregated? Will staff members and teachers be provided with item-by-item results? How will the results be used by the district—and by principals and teachers—to improve instruction? How will the results be used to define and shape professional development of school-based staff? How will the results be integrated into the ongoing work of professional learning communities? How will results be used to focus teachers on next steps in the implementation process to improve student achievement? How will student work samples be integrated into the examination and analysis of results from the new assessments? How will results be used for administrator and teacher evaluations and accountability—and when?

Logistics and Scheduling

- Logistical and Operational Details. School districts will face a series of challenges involving the critical logistical details of administering the assessments that their state has adopted. For instance, has the district clearly and widely communicated information on when the testing windows are, how long the tests are, how test administration can be segmented, and how many devices will be needed? Has the district used this information to determine the number of administrators needed and how many days will be involved in both planning and test administration?
- Use and Coordination of Facilities. Administrators will also need to plan for where
 students will be tested at each school and whether any accommodations in facilities or
 special plans need to be made. Will students be tested in classrooms, computer labs,
 libraries, gymnasiums, or some other facility—or a clearly specified combination?
 Challenges will also entail making sure that grounds maintenance, building repairs, and
 other operational considerations do not interfere with or diminish the ability of students
 to concentrate on their work.
- Scheduling. School districts will face a number of scheduling challenges. These will involve scheduling of both students and staff. If your district does not have a device for every student, how are you planning to rotate students in a way that maximizes their best work and is logistically viable? How will the district schedule both actual testing and retesting due to either student absences or technology failures that nullify a student's responses or result in testing irregularities? How will staff members be deployed to monitor students when they are not being tested— either because they have already been tested or it is not yet their turn? How many substitute teachers will you need, for whom, and during what time periods? How will the district schedule students who require special accommodations or staff monitoring? How will you handle transportation back and forth to school if there is a need to alter the regular busing schedules? How will students be scheduled into school-lab settings? Will the test administrator be a teacher of record (e.g., homeroom teacher) or a resource teacher assigned as the test administrator in

the lab for the entire administration? If the test administrator is not the homeroom teacher, how will the district upload rosters of students that are associated with the test administrator, so that the test administrator can open and close the testing sessions for the selected students? Would the testing of students best be done alphabetically or through some other method?⁵

- School-by-School Consistency. Large school districts, in particular, may face challenges concerning whether and how administration of tests will differ from school to school and how those differences will be managed or sequenced. For instance, has your district determined how much latitude each school has in the test scheduling and administration process? What standard test administration guidelines have you communicated to schools? Will schools need to wait for other schools to test before enough devices can be moved to their campuses for testing? If administration is staggered, how will districts control student transmission of test content through social media?
- Deployment and Training of Staff to Administer Tests. Part of the challenge in preparing for the new assessments will involve how to effectively train and deploy staff to administer assessments, including any interim assessments the district or state has chosen. How should staff teams be defined? What training do they need? How much of the training needs to be done face-to-face and how much can be done online or via video? Who is responsible for what, and how will staff be held accountable for the implementation? How do you need to think about roles both vertically and horizontally in the organization? Will the roles of principal supervisors and principals need to change over the long run in order to be more instructionally oriented?
- Plans. Districts will also face challenges related to providing real-time support for schools as they begin test administration. How technologically literate are staff members who will be training students to take the tests? Will the district need to set up a "command center" or other centralized or regional space in which to coordinate logistics and resolve problems as they occur? (Is there someone documenting the issues and how they were resolved?) Does the coordinating team include a technology specialist? Is everyone at the school level clear about whom to call, text, or email if a question arises? Who is assigned to answer the questions, how many schools will each person cover, and what training have they had? In addition, districts will need to consider the need for backup equipment—who will have it, and how will it be deployed? Other backup challenges will also need to be considered: What will be done if there are power outages, equipment failures, or bandwidth overloads during the testing

⁵ In some states, a pre-identification file is sent to the district where a particular students is attached to a particular test, i.e., each record or student can have a 'class' identifier to help with management at each school site. Since schools do not typically operate in a 1:1 environment and some districts use test data for teacher evaluation, one fair way to test students would be alphabetically. Teachers testing by homeroom or class sometimes get upset if their students aren't chosen for morning testing. Some computer programs like Pearson Access show all students alphabetically anyway, so management of this process can be relatively easy. At the same time, it may be hard on young students to be tested in a new room or to be overseen by someone they do not know. Pulling students alphabetically might also mean that regular classroom instruction cannot take place because some students will be missing from class. Districts will need to consider their options carefully.

cycle that cause students to be knocked offline? What contingencies have the district put into place if emergency situations arise?

Costs and Sustainability

- Costs. The public and press are likely to want to know how much it cost the district to plan, administer, and staff the tests— and where the money is coming from. Of course, this will include the costs of training, technology hardware and software, technology infrastructure and broadband, curriculum and materials, and other items. A lack of understanding about the "true costs" of the assessments—start-up costs, transition costs, and ongoing or "steady-state" costs—could easily trip up a district. Districts will also need to answer questions about the costs of any interim or benchmark assessments it chooses to use.
- *Funding*. Districts will also face the issue of how to fund the acquisition of devices that are needed and what mix of funding will be handled centrally or in individual school budgets. Rapid deployment of testing purchases will place great pressure on decentralized systems, in particular, where technology purchases are made at the school level.
- Sustainability. Finally, the district will face a number of important challenges related to sustaining the district's capacity to administer these assessments beyond the first year. Has the district thought about how the devices being acquired or purchased can be used for instructional and other purposes in addition to testing? How will the district store or warehouse the data? Is there a plan for how the data will be analyzed and tracked over time? How will data be disseminated back to the school levels, and how will it be used for accountability and value-added calculations? Have district administrators considered how they could bring together funds from instructional, professional development, assessment, and information technology sources to support the testing program over time? If the district has decided to move to a 1:1 environment (where each student has a device), is there a plan in place for attaining that goal, sustaining the ratio over time, and increasing the number of staff in order to support the configuration? Building these costs into the general fund after any initial grants expire will also present districts with challenges. In addition, districts will face sustainability challenges related to (1) communicating the value of the new tests and how the information they generate will be used to inform student instruction and supports and (2) understanding the people, environmental factors, and opinion leaders who drive the debate and public opinion about these assessment.

D. Technology and Broadband Challenges

The technology challenges to smoothly implementing new, online assessments are among the most troubling and well publicized. These challenges will not be confined to the technology department but will impact the entire school district. (Comparisons of the technology features of both consortia can be found at www.setda.org.)The challenges that school districts will need to address in this area include but are not limited to—

- Gathering Information on the Current State of Technology in the District. The lack of information on what technology the district already has and where it is located school-byschool will present a major challenge in attempting to plan for the new assessments. Are devices currently purchased directly by the schools? Does each school have a dedicated technology support staff? Do larger schools (high schools and middle schools) need additional support staff? Has your district conducted a basic inventory of technology in the district to use as the baseline for planning? Does the technology inventory include facility readiness, such as adequate electrical plugs and circuit capacity? Does the technology inventory extend to peripheral devices, such as keyboards, mice, tracking balls for mice, batteries, and headsets? Does the inventory include all the different versions of the operating system? And does it contain all of the different browsers and versions of browsers? Has your district prepared a gap analysis between the existing state of the technology and the technology specifications in the assessment implementation plan—and what the assessment consortia call for? Does your assessment implementation plan incorporate the technology specifications for the assessment being given in your state? Has the district established minimum technology standards for schools? What is the ratio of technology support staff to schools?
- Determining Equipment Functionality. In addition to lack of information on the school district's inventory of technology equipment, a lack of information on the functionality of the equipment will present school systems with a major challenge. Does the equipment fall within the district's technology standards? Will the equipment withstand the service required by the assessment plan? Do wireless devices meet acceptable standards for connectivity? Do devices have the capacity to accommodate the required testing software? Is there a plan in place to upgrade devices (a refresh strategy)? Does the equipment take into consideration the ages of students and grade levels being tested? Are electrical plugs and interface devices (i.e., keyboard, headphone, and a mouse) available and functional for every device? Are backup interface devices available and a streamlined deployment process in place for schools during testing time? Are the monitors large enough to ensure that students can read the test questions? Are the mobile devices stored and charged overnight in a safe location? Do the devices have the battery life to last the entire duration of the tests? The challenge for school systems will be to determine answers to these questions well before the testing date.
- Standardization of FF&E. Because of past decisions to decentralize budgets in many districts and because of insufficient funds for capital modernization, districts often face the risk of not having standardized fixtures, furnishings, and equipment (FFE) for the learning environment. Does the district have a standard computer contract? Is there a specific operating system being used? Is there a specific feature set? Do desktops or laptops constitute what is a standard device? What type of computing stations will be used? Where will the power run in terms of electrical outlets and/or charging stations?
- Strategic Equipment Acquisition. A related challenge to school districts will involve how they think through their acquisition of new assessment technology to augment the hardware and software they currently have. This set of issues will involve making sure that new technology is compatible with the requirements and standards that PARCC and SBAC have laid out for districts. Does the district have an asset acquisition plan that (1)

coordinates the purchase of equipment and applications school by school, (2) ensures that there is a consistency of equipment that will make maintenance and support easier to manage, (3) expedites the purchase of equipment where and when needed, and (3) determines the turn-around time for acquiring the technology? Does the district have a migration strategy for sustaining equipment use by ensuring that it has the functionality for instructional and other purposes after testing is complete? Has the district aligned these decisions with their technology and assessment plans to ensure a smooth implementation and operational environment? Has the district performed reliability analysis to ensure that the devices being acquired and deployed have the highest reliability possible?

- Configuration and Deployment Management. The high volume acquisition of devices may be much larger and different than current incremental technology purchases in terms of the receipt, configuration, and deployment of devices. Such a high volume may place a stress on current processes and capacity to configure and deploy. Has the district assessed its method to configure and deploy devices? Does the district have the capacity with current internal staff to perform this function at the high volume needed? Is there a quality assurance process built to ensure the devices are fully functional at setup?
- Network Capacity. School systems will also have the challenge of making sure that they have the Wide Area and Local Area Network (WAN & LAN) capacity to handle the web-based testing in PARCC or SBAC. Each testing consortium has its own requirements, and districts will have the challenge of determining school-by-school, room-by-room, and device-by-device whether its bandwidth is sufficient to meet testing requirements. Does the district have a network infrastructure plan that will handle the testing requirements? Does the plan account for both wired and wireless capability? Has the district conducted a bandwidth analysis determining the adequacies of supporting the testing environment? Does the district have the necessary tools needed to maintain (manage and actively monitor) the network? Does the district have the tools necessary to manage devices dependent on and independent of the testing environment? These issues are critical to ensuring the viability of the testing environment. Has each school conducted a mock/practice test with pertinent personnel, designated devices, and designated rooms to ensure that the facility and the IT infrastructure (wired and wireless networks) have the capacity to accommodate the concurrent load?
- Facilities Adequacy. Depending on the age of the school building, is the electrical wiring within the school sufficient to support the assessment program? Is access to sufficient electrical outlets adequate? Has the district reviewed fire/life/safety approaches to ensure the electrical connections meet all fire codes?
- Asset Management. Device costs are likely to fall below the threshold for formal asset tagging and accounting in a school district's financial systems. Does the district have an asset management policy for low-dollar assets that is not required by the current financial system? How will the district track the devices acquired if they are below policy thresholds for asset tagging?

- Warranty Management. The new assessment system will introduce a significant number of new devices into the district, and will increase the volume of warranty repair issues as the result. Is the district going to include warranty management within the contract for devices? What contingency threshold will the district have on hand for devices that fail and require replacement within a critically short period of time?
- *Procurement*. Given the issues of cost and the higher likelihood of decentralized budgets in some districts for technology acquisition, school systems will face an issue of procurement strategy and acquisition planning. Does the district have a central contract for devices, configuration, asset tagging, and deployment? Does the district need to amend current contracts or establish new contracts? Are there other support programs and systems needed to handle warranty, insurance, asset management and others?
- *Physical Security*. With an increase in the volume of devices and public awareness of the devices, schools will have greater risks of being targeted for theft. Does the district have adequate security systems? What is the district's nighttime asset protection program? What is the relationship with law enforcement to ensure rapid response?
- Technology Staffing. Identifying staff requirements and the distribution and deployment of the talent pool effectively and efficiently will be a major challenge facing school districts before and during test administration. Does the district have a staffing model that will satisfy the assessment plan? Has the district identified the staff that will constitute a cross-functional team responsible for the initial rollout of the testing? Has the district defined the subject-matter experts needed to work with the district's research and technology staff? This will entail identifying the district's best central-office and school-based staff and naming building coordinators and test-security personnel, along with considering how the use of these staff members affects other projects. Decisions will be needed on how the work is coordinated with the district's IT leadership and how it is coordinated with the broader district project team. Personnel considerations will also include how to coordinate with any local technology support that has been independently funded by individual principals.
- Service level Agreements. The speed at which the district can provide support to a school with single or multiple device failures is becoming more important as the move to a fully digital environment continues. Greater reliance on technology means districts must have the ability to rely on and respond to schools to minimize downtime. Time can mean all the difference in the ability of a student to complete the testing requirement. Does the district have service level agreements (SLAs) for response to device issues? Is the response time in the SLA adequate to support and maintain the testing environment? Does the district have the capacity to meet or exceed the SLA with internal staff?
- Coordination with Vendors and States. If school districts have not thought about or set up mechanisms by which they communicate and coordinate with testing vendors, then they heighten the chances that problems will not be resolved in a timely fashion. Has your district verified the platforms that your vendors support or recommend? In addition, has the district included the local and state purchasing protocols in the asset acquisition plan?

The lack of a mechanism or a set of protocols to coordinate with the state is also likely to create challenges.

- Helpdesk Challenges. The school district helpdesk(s) will also be challenged to handle the testing environment in conjunction with ongoing operations. Does the district have the capability to prioritize issues by severity tiers? Does the district have the tools necessary to capture information that can delineate problems for future resolution? Does the district have the capability to create a knowledge base that will facilitate user self-resolution? Has the district developed a metric matrix that will help measure the testing process? Are the helpdesk staff and field technicians familiar with the devices, the mobile device management software, and the wired and wireless network access software? Is the helpdesk administrator empowered to ramp up support staff to meet the demand during the testing periods? Is there a process for monitoring the helpdesk? Are the functional and technical support efforts coordinated? Has the district set up a dynamic survey that will check the pulse of students/teachers/administrators before, during, and after testing to help address issues?
- Student Familiarity with Technology. Most students will be taking the new assessments on a computer, lap-top, tablet, or other device. The tests will require students to respond electronically, manipulate graphics, drag-and-drop material, utilize touch screen gestures, and other tasks. Does the district have a plan for introducing students to the testing environment? Does the plan include documentation detailing the devices that will be used in the testing environment? Students will need to be familiar with computer features well beyond basic key-boarding skills. Questions will arise about whether students have been prepared for the equipment they will use and whether or not they have had an opportunity to practice on it if it is unfamiliar. For instance, some students who are used to a mouse and keyboard may not know what to do with a touch-screen device or vice versa.
- Security and Privacy. School districts will also be faced with security challenges at both the device and the test levels in order to maintain the integrity of the testing environment. Does the district have a data and network security plan? Does the district have a device management strategy for security and acceptable use? Does it have the ability to manage secure-wired and wireless environments for testing? Has the district developed a strategy for test monitoring and test security? Has the district identified the pool of test proctors and backups? Does the district have a training plan for test proctors to handle onsite technology and other test security issues?
- Best Practices. Another set of challenges in the technology area will involve documenting what worked and what didn't, so that the school system can adjust its practices in subsequent years. Does the district have a knowledge base set up to incorporate documentation of the ongoing testing? Does the knowledge base or documentation include district activities in the areas of technology, logistics, and scheduling, as well as practices in academic instruction? This documentation will be vital for communicating to students, teachers, administrators, parents, press, and the public.

E. Communications Challenges

School districts will also need to think about how to inform and engage the public, the press, and various stakeholders internal and external to the organization. Some of the main challenges in the area of communications will include—

- The Messages. The first major communications challenge the school district will face will be to define what messages you want to send about the new assessments and their likely results. Ensuring that the overall message is uniform, simple, and coherent is key to making it compelling and accessible. In your outreach to the community, you will also need to inform stakeholders about (1) what the new standards are and what they are not, (2) how the new assessments relate to the standards, (3) why the new assessments are so long, (4) the new and higher expectations that the standards set, and (5) what those new standards and expectations mean for the future success of students. The districts may also need to clarify where the standards came from, who developed them and who did not, why the standards matter, what the test results will tell us, and how they relate to concerns being raised in the public about the standards and the accompanying assessments. Moreover, the district will need to have a plan for how it uses social media and its full arsenal of communications tools to make sure the district's messages have broad reach.
- The Messengers. A related challenge will involve determining who the messengers should be, how they will be trained, and how to keep their statements consistent. Matching messengers with targeted audiences will be an important consideration, as will be translating the materials and messages into languages spoken by community members. School board members, the superintendent, and other district-level advocates will also expect to be part of the communications strategy of the district, so districts will need to determine how to strategically build them into the process.
- The Audience. Most big city school districts have very diverse stakeholders with very different perspectives about the meaning and value of standardized testing. Identifying these audiences is a crucial challenge for most school districts. Districts will also face the challenge of how to differentiate their messages for both internal and external audiences. Critical audiences will include the teachers' organization or union, the business community, the press, higher education officials, charter leaders, community organization leaders, faith leaders, and others. Getting the cooperation and buy-in of opinion leaders, advocates, and others who shape community opinion will be particularly critical.
- The Results. Communicating the results of the assessments will be one of the biggest challenges that school districts will face. The public is not likely to understand the apparent drop in student performance, and opponents of the standards and their assessments will use the lower results in an attempt to undermine both. Parents and the public will need help in understanding the metrics in which the results are reported, as well as what the new, likely lower scores mean and don't mean about student achievement.

- Using the Results. Describing how the new assessment results will be used to improve instruction, guide teacher practice, and improve outcomes for students will also be important challenges for school districts. Part of this will entail outlining how the district will differentiate instruction and support struggling students based on test results. Districts might also face challenges in describing how the new assessment results will be used alongside results from other tests like student learning objectives (SLO). One particularly controversial issue that is bound to arise as well is how the results of the new assessments will be used to evaluate teachers and when. Addressing the current public focus on teachers will be a crucial district communications challenge.
- Sustaining Communications. Finally, school districts will face the ongoing challenge of sustaining effective communication with the public about the purpose of the assessments, what they mean, how they are being used, and what they will eventually tell us about district and student progress toward college and career readiness. The challenge will be to sustain the messaging both at the grassroots level and among district and community leaders.

Recommendations for Successfully Implementing the New Assessments

Anticipating the challenges that school districts are likely to face in implementing new college- and career-ready assessments is only the first step. How a district addresses those challenges will ultimately determine the success of implementation. This section presents a series of recommendations and proposals to address the challenges identified in the previous section. These recommendations are meant to help districts be proactive and thoughtful in their approach to implementation in the coming school year and beyond.

A. Recommendations to Meet Leadership and Political Challenges

The recommendations in this section are designed to help school systems set the leadership preconditions and strategies needed to ensure that assessment implementation is successful. These proposals are broad, overarching steps that need to be put into place if the tactical, programmatic actions the district takes are to be successful. In order to address leadership and political challenges, districts should—

- Ensure that the board of education and the superintendent send a strong, positive and unified message to staff and the community that implementation of common core standards and assessments are leading priorities of the district. No one should mistake what the leadership thinks on this matter.
- Make sure that the implementation of common core standards and the accompanying assessments are incorporated as a centerpiece in the school district's overarching strategic plan for the year and into the future. Continue to broadcast the district's commitment well after the first administration of the new assessments
- Develop an implementation plan to prepare for and administer the common core assessments districtwide. This plan should articulate how online testing fits into other major district initiatives/priorities and how it aligns with other district assessments. The

plan should include the following components—

- a. Prioritization of the new standards and their assessments
- b. A description of how district resources will be aligned or realigned for successful implementation
- c. An estimate of the time it will take the district to ensure all the pieces of the plan are in place (See exhibit 3 on page 45.)
- d. How steps in the planning and implementation process will be sequenced
- e. What staff will be deployed, how they will be coordinated, and how the effort will take into account staff's other duties and responsibilities
- f. How staff will be held responsible for results
- g. How technology resources and gaps will be identified school by school and at the district level—and when the inventory will be completed
- h. A description of the budgetary implications of implementation and how financial resources will be allocated
- i. A description of who makes budgetary decisions and how they will be made, along with details on the source of funding
- j. A process for long-term planning, since the assessments will be given each year for the foreseeable future
- Review district policies that might present barriers to effective and consistent implementation of the assessments. Examples might include policies around school adoption of differing technology devices, acceptable use policies, and policies around accommodations.
- Name a cross-functional executive steering committee to support and oversee the process
 of implementing the common core and their aligned assessments. This team should
 incorporate staff from the following offices or areas—
 - Superintendent's office and cabinet
 - Academics or curriculum and instruction
 - Assessment and testing
 - Technology
 - Special education and bilingual education
 - School leadership and principal supervision
 - Operations and business services
 - Communications
 - Budget and finance
 - Principals and teachers
 - Facilities Services
 - Human Resources

Subdivide into specific work teams to correspond with priority areas of implementation.

• Strategically use meetings of leadership and of the superintendent's cabinet to ensure smooth implementation of the assessments and to gauge progress. Develop a

responsibility assignment matrix (RAM), also known as a RACI (Responsible, Accountable, Consulted, Informed) matrix, delineating responsibilities, accountabilities, and lines of communication, along with a list of individuals who need to be kept up to date on project progress and status.

- Develop a school readiness checklist and implementation plan template.
- Develop a strategic outreach plan focused on district and school staff, parents, the
 community, and key local constituencies, emphasizing what the district is doing to
 implement the assessments well and the objectives of the district in pursuing this work.
 The purpose of this outreach plan should be to inform the public and build buy-in for
 what the district is doing.
- Proactively address the issue of lower test scores in your communications with parents, the media, and the community. Prepare the public for the apparent "drop" in test scores before the results are released, emphasizing that proficiency rates on new assessments are not comparable to previous assessments and that lower test scores do not mean that students have learned less or fallen behind academically. Reference other state examples for context, and, if you are a TUDA district, look to your NAEP results for indicators of likely district scores and to demonstrate progress over time. If you are able to do so, conduct an equating study on the old and new state assessments to develop comparable trend lines that can better inform the public about progress.
- Wherever possible, direct the story toward the strength of the new standards and assessments and what better instruction will mean for the preparation of students for the future.
- Create strategic allies in the community to help the district advance understanding of and support for both the standards and their assessments. Be clear about how the district intends to sustain this support over time.
- Create strategic alliances with the local teacher unions and associations, if possible, in support of the implementation plan. The best way to do this is to involve them early in the planning process and to involve them in discussions about use of results.
- Ensure that each district department that has a role in implementing the new assessments is sufficiently staffed, even temporarily, and has the skills necessary to support the implementation.
- Ensure that critical staff members have the knowledge of technology, training, and access to tools and supports they need to oversee and guide the implementation. Promote crossfunctional collaboration among the key players.
- Document best practices and lessons learned during the planning and implementation process to inform continuous improvement for future assessments.

- Document and celebrate key milestones and victories to build momentum past the first year of the test administration.
- Establish an accepted approach for the budgeting and acquisition of computer devices needed to support the testing environment. Create the buy-in necessary based on the district's culture and relationships with school-based staff. There are two general approaches:
 - Centralize budget and acquisition: Based on an operational-gap analysis conducted by IT professionals, establish a central budget, contracting, and allocation system. Determine if schools will be "held harmless" in the budgeting approach, or if a charge-back method to off-set costs will be created.
 - Standardize budget and acquisition: If centralizing is not viable, districts should establish a standardized approach on a per student basis to ensure appropriate investment at the school level. A central contract agreement can be established so all schools are acquiring devices that support the testing requirements.
- Establish a specific strategy map in which each representative on the steering committee
 integrates the strategies their team will be using with a set of specified timeframes.
 Require each work team to have project management plans that detail the specific actions
 and deadlines that have to be met. Ensure that the steering committee collaborates on
 interdependent timelines and actions that cross department lines. (See suggested
 timeline.)

B. Recommendations to Meet the Challenges of Academic Readiness

A second critical component for successfully implementing the new assessments involves making sure that students are academically prepared to do well on the tests. Much of this has to do with implementing the standards well, but the new assessments are not the standards and special attention needs to be devoted to ensuring that children are ready for and comfortable with an assessment that is likely to look very different from the state tests they have taken in the past. In order to address this challenge, districts should—

- Ensure that the instructional shifts called for in the common core are being implemented in every classroom and that teachers are equipped with the knowledge and professional development necessary to teach students to the new, higher standards. (The Council of the Great City Schools is in the process of developing indicators to measure district implementation of the standards.) Identify indicators of successful implementation at the system, school, and classroom levels, and adopt look-for protocols based on these indicators. Establish a process for soliciting feedback from schools on issues and challenges and adjusting school supports and resources accordingly.
- Ensure that teachers of different subjects, grades, and students receive the differentiated professional development they will need to implement new college- and career-ready standards across the curriculum. In its support and communications with teachers and schools, the district should be clear that high expectations and access to the new higher standards apply to *all* students.

- Ensure that students are getting experience performing the types of tasks and answering the types of higher-level questions likely to be asked on the new common core assessments and that demonstrate understanding of concepts and skills. This does not mean "test prep" —you cannot drill your way to success on these new assessments. But students should be getting more experience struggling with the kinds of complex, multistep questions they will encounter on the assessments and providing written explanations and justifications for their answers. (See <u>Beyond Test Scores: What NAEP Results Tell Us About Implementing the Common Core in Our Classrooms</u>.)
- Ensure that teachers and students have classroom experience with the technology and the devices the students will use when taking the online assessment. They should also have experience with the kinds of commands (e.g., drag and drop, touch screen gestures) that some assessment items might ask of students.
- Articulate clear roles and expectations for district instructional staff, principals, principal supervisors, and school-based instructional staff concerning implementation of the new standards and assessments. Design professional development that prepares staff at various levels for their implementation roles.
- Design and provide appropriate and consistent training and preparation of school-based teams to ensure fidelity of test implementation of the curriculum and the use of technology for instruction and assessment. Align the responsibilities of school testing coordinators and technology support staff members.
- Tap lead teachers to build knowledge, ownership, and buy-in at the school level and in the community for the standards and the new assessments. Pay a stipend for additional work if need be.
- Ensure that appropriate accommodations are provided in daily classroom instruction for special populations, and that school staff are fully aware of which students are assigned what accommodations for assessment purposes. Each student should be familiar with the types of accommodations they will have and should be able to practice with them prior to the assessment.
- Establish procedures or benchmarks by which the district and schools are able to determine ongoing student progress toward common core expectations over the course of the school year and ways to address what the benchmarks reveal.
- Ensure that the district is continuously revisiting and adjusting the curriculum and all instructional materials to ensure that they are aligned with the new standards and provide clear guidance for classroom instruction.
- Approach the acquisition of new materials supposedly "aligned" to the common core with a critical eye. Conduct an alignment and quality review of all potential new materials using resources such as the Publishers Criteria, IMET, GIMET, and ELL 2.0, and ensure that any new materials, texts, and supports fully meet the needs of *all* students

in a district, including struggling learners, non-native English speakers, and students with disabilities. Provide professional development on the use of any new materials and tools.

C. Recommendations to Meet Operational Challenges

As we saw in the section on challenges, some of the most daunting are in the areas of operations, logistics, and scheduling. In order to address both general logistical and operational challenges and the challenges associated with scheduling students and staff members, districts should—

Planning and Operations

- Create a specialized logistics team to handle the details of assessment implementation. On the team, include district and possibly state staff with expertise in
 - a. Technology
 - b. Assessment
 - c. Operations
 - d. Facilities
 - e. Finance
- Charge principals with naming a school-based team to implement and sustain the common core assessments at the school level. The team should include the following school staff
 - a. Assessment coordinator
 - b. Technology coordinator
 - c. Special populations staff to handle accommodations and scheduling for special students
 - d. Departmental, grade-level, and instructional staff
 - e. Lead teachers and other teachers
 - f. Principal and assistant principal to handle general scheduling
- Develop a plan that maps backward (a "backwards design plan") from March 2015 to September 2014 and that articulates
 - a. A detailed test administration schedule, including any practice tests
 - b. The state's policy for retesting or finishing an already-started assessment.
 - c. Steps for training test administrators
 - d. An inventory of technology by school and the functionality of that technology along with an analysis of gaps in what is needed.
 - e. Policy guidelines governing test administration, data privacy, and transfer of data and records.
 - f. Training documents and/or PowerPoints offered by the state that describe test procedures and other consistent messaging across school systems.
 - g. Test-item security provisions and protocols, including security agreements signed by school staff members handling secure test materials, and provisions to eliminate the potential for students to transmit test content through social media.

- h. Guidelines for purchasing equipment, technology, and other materials, including reserve quantities to ensure rapid response to emergencies.
- i. Guidelines for installing applications on devices that might interfere with testing sessions, including operating systems, hardware, and firmware updates (e.g., security locator applications that signal the computer's location periodically—even during a testing session, which may interrupt the session).
- j. The process for developing and sharing school-by-school plans for implementation (in early fall, as well as iterations in January/February). These plans should be reviewed by the district to determine immediate concerns at the school level.
- k. Performance metrics, e.g., network performance data, help desk statistics, incidents, interactions, etc.
- 1. A map of all assessments and how they are sequenced in addition to common core consortia or state assessments
- m. How the district and schools will use holiday periods and Spring break to move the implementation forward.
- n. How the district will communicate with schools about scheduling, and how the district and schools can adjust testing dates with state approval.
- o. A readiness checklist.
- Identify and ensure teacher and administrator familiarity with the accommodations and embedded supports for special populations in the assessment process.

Troubleshooting

- Conduct mock/practice tests to evaluate the readiness of pertinent staff, devices, facilities, and network infrastructure. Include feedback surveys (of students and staff) for the district or state to monitor progress. Report all facilities and technology issues well in advance to allow ample time for the departments to remediate/repair
- In planning for potential crises, identify tiers of issues for each managing entity: state, district, and vendor. For example, tier 1 issues might include immediate testing situations, while a tier 2 or 3 issue might include longer-term considerations, such as ensuring data privacy. Clarify the appropriate resources needed to address these issues within schools, with vendors, and at the district and state levels. Immediate test-day issues should be separated into individual tiers by their complexity: lowest tiers, e.g., resuming a student's test; middle tier, e.g., fixing a power outage; and highest tier, e.g., recovering a lost log file.
- Name "troubleshooters" at the district level who can address any problems that individual schools encounter during the testing process.
- Establish a system for documenting problems and successes at the conclusion of the testing cycle to inform future administrations. Be prepared to share these lessons with the public.
- Also establish a system for communicating with schools regarding updates, immediate concerns, and lessons learned.

Conduct a gap analysis to assess the response time needed to fix devices and/or to
address connectivity issues in schools. If internal capacity is not adequate to meet the
needed response times, then consider contracted resources to perform this service.

Scheduling

- Develop districtwide and school-level scheduling plans that include the following considerations:
 - a. Testing time and number and times of testing sessions and duration based on available computers used for testing and the numbers of "to-be-tested" students.
 - b. Number of staff members needed for test administration (given considerations of teacher certification, special needs students, contract limitations, split staff, available outside support for administration—i.e., retired teachers, educational assistants, etc.).
 - c. Whether or not teachers assess their own students and what it means for test security. Consider schedules that allow fourth grade teachers to assess third grade students, etc.
 - d. Cost of staff members and auxiliary and contract staff.
 - e. Devices and peripherals per student and types of devices.
 - f. Fully charged devices with updated operating system.
 - g. Idle computers where class sizes are small. Consider pooling classes or testing by alphabetical order. (Note: testing in alphabetical order may maximize device usage, but may disrupt instruction and student comfort.)
 - h. Number of sessions in a testing day, taking into account lunch, dismissals, and "early-releases"
 - i. What subject is tested and when. For example, testing one subject at a time, so a child isn't over-tested on a given day.
 - j. Number of testing environments (e.g., accommodations, extended time, etc.).
 - k. Constraints such as the number of devices vs. available staff.
 - 1. Time management, i.e., how staff will need to manage their time in order to oversee test administration in addition to their other responsibilities
 - m. What to do with students who are not in test sessions? Those students might include:
 - Students displaced from class sites.
 - Students left in class because the district scheduled test-takers by alphabetical order.
 - Non-tested grades.
 - Students who finish early.
 - Absent students.
 - Make-up tests.
 - Waivered students.
 - Incomplete tests (due to a technology glitch, due time, mobility, etc.).
 - Students in jail, the hospital, or are homebound. How will they be tested and in what format?
 - n. School size and grade span, i.e., elementary vs. secondary.
 - o. The need for a contingency schedule (if Internet goes down or buffers).

- Review sample schedules from other districts to inform options.
- Train district-level school scheduling staff on multiple scheduling options to help guide and customize scheduling for school sites. Identify:
 - a. Who is on the staff team?
 - b. What areas they are tackling?
 - c. Have they been vetted by principals?
 - d. How successes and failures with the various scheduling options are captured and shared across the district for future reference?
- Ensure that staff members are able to respond to such questions as:
 - a. How are we scheduling to optimize the testing environment?
 - b. How are we minimizing disruptions to the regular instructional day?
 - c. How can we accomplish testing within the allotted testing window?
 - d. How have we addressed the needs of special populations?
 - e. How have we addressed test security considerations?
 - f. How are individual test-administration plans aligning with the overarching district plan?
 - g. How are we communicating the testing schedule to parents and stakeholders?

Sustainability

- Conduct an ongoing needs analysis to inform scheduling and logistical requirements.
- Monitor the district website and email to ensure awareness of technical and functional issues being experienced by the district and its personnel. Communicate these issues to the testing provider and schedule system maintenance in a timely manner.
- Quantify the *total* cost of implementation over one, three, and five years, including costs associated with devices (purchase and maintenance), professional development, staff, the time it takes to prepare for and administer tests, etc.
- Identify likely shifts in sources and uses of funds to maintain support for online assessments aligned with the common core.

D. Recommendations to Meet Technology Challenges

In addition to the operational and logistical challenges of implementing new assessments and sustaining them over time, the *online* nature of the new tests also presents districts with critical technology and broadband challenges. In order to ensure that the technology infrastructure and human resources necessary to successfully administer these tests online are in place, districts should—

• Create a special technology team for the initial roll-out and ongoing support of testing (i.e., a "tiger team"). This team should provide oversight and serve as the point of contact to facilitate technology decisions. This team should be selected from the following areas:

- a. Help-desk personnel
- b. Field technicians
- c. Network technicians and engineers
- d. Device management specialists
- e. Subject matter experts, e.g., reading coordinators and math directors
- f. Test proctors and monitors
- g. Assessment department staff
- Build, enhance, and leverage existing relationships with assessment vendors, and work toward a more strategic role for them in district planning.
- Review the district's existing portfolio of vendor contracts in advance of the implementation to ensure maximum flexibility in purchasing and servicing through a fair and open procurement process.
- Conduct an inventory of current devices and peripherals in the district to establish a baseline of technology and determine technology readiness. The inventory should detail equipment by type, age, software versions, and state of functionality. All of this should be detailed by school and location within school. In addition, the inventory should take into account the age and grade of students, e.g., younger and smaller children will need to have smaller earbuds. And the district may want to consider lice-resistant headsets.
- Establish a reserve of spare components and devices to minimize downtime, e.g., tablets, earbuds, microphones, and other equipment identified by the cross-functional team and the specialty teams.
- Conduct a gap analysis between the baseline inventory of equipment and the minimum standard detailed by PARCC and SBAC to understand where the district stands. This analysis should then be compared to the assessment implementation plan to determine equipment needs.
- Be aware that operating systems and browser versions have a huge impact on how the
 testing environment functions. Both PARCC and SBAC have compatibility criteria that
 should be taken into account. It is important to note that both entities update these criteria
 on their websites and districts should be mindful to consult the websites and review the
 changes. (See exhibit 2 on page 43.) Specific details that districts should be aware of
 include the following—

Smarter Balanced

- a. Each year, SBAC will release a new set of secure browsers.
 - These browsers prevent students from accessing other applications and copying or creating screenshots.
 - The secure browsers must be installed on each computer used for online testing.

- The secure browser must be installed on a yearly basis, due to implementation of new features in the test delivery system and to support operating system updates.
- Standard web browsers can be used to access other components of the assessment package, including test administration tools, student practice tests, and the test administrator interface.
- b. For data reports, Google Chrome, Safari on IOS (Apple devices), Firefox, and Internet Explorer 8 and above are supported.
- c. The operating systems supported by SBAC include Windows (XP, Vista, 7 & 8), MAC OS (10.4.4-10.9), Linux (Fedora Core 6+, Ubuntu 9-12), Chrome OS (31 or higher), IPAD, (IOS 6&7), Android 4.0.4-4.2).
- d. Although commonly used browsers such as Internet Explorer, Safari, Chrome, and Firefox are supported, only certain versions of the browsers are compatible with the operating system versions of the devices.
- e. Average estimated Internet bandwidth utilized by the Secure Browser for testing is 8 kilobits per second per student.
- f. Network and device requirements and other technical details such as the minimum and recommended operating system and browser compatibility charts are provided on the SBAC website (http://sbac.portal.airast.org/wp-content/uploads/2013/07/SmarterBaanced_TechnicalSpecificationsManual.pdf)

PARCC

- a. The operating systems supported by PARCC include Windows (XP, Vista, 7&8), MAC OS (10.6+), Chrome OS (33 or higher), iPAD (IOS 6&7), Windows Tablets (8&8.1).
- b. Android tablets are currently being tested, and updated requirements will be posted on the PARCC website.
- c. Although commonly used browsers such as Internet Explorer, Safari, Chrome, and Firefox are supported, only certain versions of the browsers are compatible with the operating system versions of the devices.
- d. Minimum specifications may not be adequate beyond the second year of PARCC assessments in 2015-16 and may experience slower performance.
- e. Recommended specifications can be expected to satisfy PARCC guidelines through the 2018-19 school year.
- f. PARCC recommends 100 kilobits per second per student or faster for assessment and instruction.
- g. For schools with limited Internet bandwidth conditions, "caching" provides a secure option for the delivery of the interactive computer-based tests. Schools should plan to have 5 kilobits per second of available bandwidth in their connection to the Internet for each simultaneous test-taker.
- h. The Technology Guidelines for PARCC Assessments document (http://parcconline.org/sites/parcc/files/Technology%20Guidelines%20for%20PARCC%20Assessments%20v%204_2%20May%202014.pdf) provides detailed specifications for operating systems and browser combinations, as well as firewall and network configuration requirements.

- Set up specific times to test all of the devices to be used in the testing environment. All peripheral components (i.e., earbuds, headphones, keyboards, etc.) and special keyboard keys (like CAP locks) should be tested to ensure functionality and compatibility with devices and testing applications. If at all possible, a practice test might be conducted and should reflect as closely as possible the actual testing environment to measure the impact of concurrent sessions.
- Ensure that teachers and students have classroom experience with the technology and the devices they will use when taking the online assessment (to the extent possible). They should also have experience with the kinds of commands (e.g., drag and drop, touch screen gestures) that some assessment items might ask of students.
- Because there are multiple factors that can have a detrimental effect on the continued service of technology, develop a technology continuity plan to provide a fallback to minimize downtime and network failure. The plan should reflect the contingencies, recoveries, and replacements that could be enacted if a situation arose. Network examples could involve procuring broadband (4G) enabled wireless hotspots as a secondary connection to the network or cloud-managed wireless access points (Instant Access Points) to extend the wireless coverage in testing locations.
- Utilize the capability provided by PARCC to pre-download—or cache—the encrypted test questions and assessment content locally on a computer to minimize the impact on the schools' network. In addition, districts' IT departments should utilize the technology readiness tools offered by PARCC to evaluate their network readiness. If the capacity metrics do not meet the school needs, then caching can be used to reduce impact on their networks. (PARCC has caching capability that eliminates the dependence on Internet access. SBAC is also working on creating one. School districts that have used the caching are pleased, but they do need a trained testing coordinator who can set things up properly at each school.)
- Establish an acquisition plan with your procurement department to ensure that the supply chain of devices are purchased, configured, allocated, and set up in time to test the environment prior to student testing dates. Should adequate time not be available to compete, leverage existing contracts that meet state/local competitive bidding requirements and can be combined or extended to provide additional resources. These might include leveraging current contracts, piggyback contracting, consortium purchasing, purchasing-off-the-state bid, and others. This is critical to ensuring a successful start to testing and having resources and equipment ready and available. At a minimum, ensure that the plan articulates the following:
 - a. Technology
 - New devices
 - Equipment upgrades
 - Peripherals
 - Asset etching/tagging
 - Storage and charging devices
 - Configuration services for high volume acquisition and deployment

- Support capacity for maintenance and support if internal capacity is insufficient.
- b. Program Support
 - Facilities
 - Electrical wiring and drops
 - Network support
 - Finance
 - Asset management system if needed
 - Asset inventory supplies and support
 - Warranty/insurance support
 - Security
 - Device security equipment
 - School security equipment
- Ensure that functional and technical support staff are utilizing the same service desk software to manage school issues. This may require centralization of IT technology support staff and standardization of information collected for school needs.
- Ensure that regular system and technology maintenance does not overlap with the testing period.
- Be aware of the lag time needed for the installation of necessary components to ensure a stable and effective network infrastructure. This complexity requires the development or augmentation of a network infrastructure plan for both wired and wireless environments that:
 - a. Ensures that schools and rooms where testing will be conducted can support the devices being utilized, i.e., testing rooms have appropriate numbers of electrical outlets, power sources, and facility readiness.
 - b. Ensures that district and location network capacity is sufficient to support the published testing standards
 - c. Determines the bandwidth adequacies for supporting testing, with an emphasis on concurrent loads on the environment
- Develop a network and information security plan that maintains the integrity of the testing environment and of student information. The plan should reflect compliance with local, state, and federal laws.
- In order to effectively manage the testing environment, districts should acquire the appropriate tools to:
 - a. Monitor the school-based local wired and wireless network infrastructure in real time
 - b. Remotely configure and repair network appliances
 - c. Secure network access through authentication/802.11x (Network Access Control)
 - d. Manage device assignment, configuration, and content (Mobile Device Management)

- Ensure that the technology implementation plan aligns with other department plans, since many district departments will have their own plans that are germane to their respective disciplines but that will have aspects that cross over to other departments. Consider the following
 - a. Help desk schedules that include testing and ongoing operations
 - b. Training and deployment of pertinent personnel, e.g., temporary staff to support the helpdesk, substitute teachers, field technicians, etc.
 - c. Ensuring student and teacher familiarity with devices
 - d. Metric matrix for monitoring progress and stability
 - e. Needed consultations with collective bargaining units
- Develop a staffing model to support the implementation in a way that is cognizant of the fact that the testing environment is an added function for staff. The model should reflect the time mandates and labor distribution for ongoing operations and the testing environment, including:
 - a. Funding for full-time location-based technology resources.
 - b. Test proctors and monitors.
 - c. Peak-time help desk personnel.
 - d. Identify staff from other departments that can be brought onboard to support the schools.
- Monitor and analyze help desk statistics (e.g., wait time, dropped calls, open tickets by type, aging reports) to assign appropriate resources to identified issues.
- Develop technology training and "digital citizenship" for teachers, students, and support staff.
- Develop surveys for school administrators, teachers, students, and parents, and administer the surveys after every assessment to identify problems and successes. The surveys will serve as a conduit to the testing environment, ensuring that issues can be resolved and processes streamlined to minimize frustration.
- Conduct daily update meetings with the implementation teams to review common issues, support challenges, and review service desk statistics. Take necessary actions needed to resolve the issues and update the district's website. Escalate actions as necessary.
- Consult PARCC, SBAC, and the websites of other districts, especially those districts that
 participated in the 2014 practice test for technical standards, specifications, and lessons
 learned documents. Examples include
 - a. http://achieve.lausd.net/sbac
 - b. http://achieve.lausd.net/cctp
 - c. http://www.parcconline.org/
 - d. http://www.smarterbalanced.org/
 - e. http://www.cosn.org/focus-areas/it-management/becoming-assessment-ready

- Facilities Adequacy. Depending on the age of the school building, the adequacy of the electrical load and the availability of outlets may be insufficient. Districts should have their facilities engineering teams assess schools for electrical capacity, work with school leaders to determine the layout and configuration of testing logistics, and determine if there are appropriate electrical connections. Facilities professionals should ensure solutions meet all current building and fire safety codes. To do this, we recommend that districts assess current internal capacity in the facilities department and current workload requirements for ongoing operations. If there is less than sufficient capacity, districts should consider contracting out for an engineering assessment for electrical adequacy. Further it is recommended, districts do the same to manage rapid execution of any modifications that will be necessary to ensure adequate electrical support and access.
- FF&E Standardization. The district should convene a team to examine standards for fixtures, furnishings, and equipment to support testing. This will not only ensure school staff have defined device types, but the procurement office will have a better chance to rapidly meet needs and the IT office will have a better chance of focusing support and training on a single device and operating system.
- Asset Management. It is likely that some testing devices will fall below the dollar threshold of the inventory requirements in the district's financial system. Therefore, districts should review their asset management thresholds and determine if they need to make adjustments to support test device acquisition, or ensure that low-dollar assets that are not tracked in the district's financial system are accounted for in the asset management system. This is particularly important if the district will be centralizing and/or standardizing technology devices across schools. Districts may also be able to track devices within their textbook inventory systems, but they should assess the adequacy of this option. In the event that devices will not be tracked in the district's main financial system, and the school-based textbook inventory system is not adequate, districts should examine acquiring a lower dollar value asset system that will meet their needs. If districts elect to implement a laptop and cart solution for testing, it is recommended that a component of the contract agreement for configuring devices also include an asset etching component to mark the device as district property.
- Warranty Management. The new testing system will introduce a significant number of new devices into the district, and will increase the volume of warranty issues as a result. Districts should review their current warranty contracts and insurance policies for adequacy, as simple coverage for repair and replacement will not be adequate. Districts should also assess internal capabilities for support and review their warranty contracts to cover any possible gaps in internal staff coverage capabilities. Warranty coverage should have an expediency clause to ensure replacement happens at an acceptable pace to ensure devices are on hand to support student testing.
- Configuration and Deployment Management. Districts should assess internal capacity to configure and deploy testing devices. Most districts will assume that their current systems will be able to handle far larger demand, but the influx of devices and materials may create risks in timelines and quality assurance. District should assess this capacity and

risk, and consider using a third party to receive, configure, deliver, set-up and test all devices. This will address both capacity and quality control, and shift risk to a third party.

- *Physical Security*. There will be greater awareness that district schools have significantly higher volumes of devices on hand, resulting in increased risk of schools being the target of break-ins. Districts should review the following areas of their security program in advance of new devices arriving on campus:
 - a. Asset Protection: Districts are familiar with lock-down devices that will deter theft of stand-alone desktop computers. Should districts determine that laptops and carts will be the method used to cover testing, they should identify lock-down rooms or areas to secure the rolling carts and devices.
 - b. Alarm/Camera Systems: Districts should review their alarm system adequacy with a team from facilities and security to identify if there are gaps in school coverage. The adequacy of camera system support should also be assessed.
 - c. Nighttime Security: Districts should review their nighttime asset protection detail for adequacy. This is particularly important if a district is required to be first to open a school for law enforcement to enter. If there are too few staff and response time is inadequate, nighttime theft risk may increase.
 - d. Law Enforcement: District representatives should meet with law enforcement to review the new testing requirements and the volume of devices that will be in schools.

E. Recommendations to Meet Communications Challenges

Finally, districts will need to take deliberate and strategic steps to inform and engage parents and the community. Long-term success of college- and career-ready standards and assessments will depend on broad-based support and buy-in for the new tests as a tool for improving teaching and learning throughout the district and the nation. Districts are encouraged to consult Communicating the Common Core: A Resource for Superintendents, School Board Members, and Public Relations Executives. In designing a strategic communications strategy, districts should—

- Develop deliberate, positive, and consistent messages designed to communicate to
 parents and communities the key value of the standards and their assessments. Focus on
 how they will be used to improve youngsters' knowledge and skills for college and
 careers. Use the messages when reaching out to parents and staff throughout the
 organization.
- Identify three key messages for parents around common core standards. These messages should be tangible, meaningful, and student-focused. Examples might include:
 - a. Students mastering CCSS will graduate from high school better prepared for college and careers.
 - b. Higher standards will benefit *all* students—no matter where they live.
 - c. The new standards will lessen the need for college remediation.
 - d. The standards will be the same no matter where you move.

- e. New standards should be given time to work.
- f. The new standards have students reading the kinds of complex material they are likely to see in college and the workplace
- g. The new assessments will provide a more accurate assessment of what my child knows and whether he or she is progressing appropriately
- Identify key messages important to other stakeholders, such as chambers of commerce, government leaders, etc. Examples might include:
 - a. Higher standards will mean a higher return on educational investments.
 - b. Higher standards will lead to greater workforce preparation.
- Provide specific, concrete information about the tests (e.g., how they will look, how they will be administered).
- Keep the press informed as you are putting the pieces of the implementation plan into place.
- Develop compelling messages specific to the new assessments. Key assessment messages might include:
 - a. Assessment is a tool to measure student mastery of standards.
 - b. Assessment will provide data that can improve instruction. Test scores will indicate where progress has been made and where progress is needed.
 - c. Assessments will provide districts with information to make better decisions regarding the allocation of resources and where to provide additional support.
 - d. Testing takes time, but the data provided will be of great benefit to districts and educators, helping them to make informed decisions about resource allocation, instructional planning and practice, etc.
 - e. Testing data will give parents the information they need on how well their children are doing and will empower them to advocate for their children (particularly since proficiency rates may not appear artificially high like they do on some current state assessments).
 - f. New assessments cannot be compared to old assessments.
 - The old tests often measured minimum competency. The new tests hold higher expectations for students.
 - The new, more challenging tests can spur greater student engagement.
 - There will be fewer multiple-choice questions and more student-generated responses on the new tests.
 - While we cannot compare new to old test results right away, we will be able to measure our students' mastery compared to other students across the country (and we want our students to be the best).
 - g. Assessments require technology, but that technology can also be used for instruction and to expand learning opportunities for kids.

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- In crafting messages, lead with points related to teaching and learning, NOT with testing. References to testing often elicit negative responses from parents and the public.
 - a. Emphasize that teaching and learning are the most important things, not preparing students to take tests. Tests are meant to measure how well students are progressing.
 - b. Instruction should not focus on improving test scores, but test scores can improve instruction by underscoring areas of need and prompting teachers to shift their instructional approaches.
- Utilize a diverse array of communication vehicles, including
 - a. The district website
 - b. Print materials
 - c. PTO/PTA/parent meetings, conferences (creating key communicators and advocates among teachers, principals)
 - d. Media pitches/releases
 - e. Social media
 - f. District TV or radio
 - g. Intranet
 - h. Email/texts
 - i. District publications (internal and external)
 - j. Board meeting presentations
 - k. One page fact sheets
 - 1. City council collaborations (local and state officials)
 - m. Videos and parent roadmaps prepared by the Council of the Great City Schools
- In identifying effective messengers, remember that parents often look to teachers first to help them make up their minds about educational reforms or approaches. It is therefore critical to build buy-in and ownership of the standards and assessments among educators and equip them with basic talking points and frequently asked questions.
- Engage students with specific messages about common core and the benefits to them in informing and preparing them for college and careers.

Exhibit 2. Focus on Technology: Developing a Device Plan

- Determine the device type that will be deployed.
- Determine number of devices to be deployed.
 - a. One student per device (1:1)—The advantage is that all testing can happen simultaneously if district bandwidth is available.
 - b. Up to three students per device—The advantage is cost feasibility, can still test one grade level at a time.
- Determine arrangement of devices.
 - a. Lab arrangement with laptops or desktop computers
 - b. Classroom sets of devices
 - c. Classroom stations for small groups of students
- Determine number of types of devices to be used.
 - a. Same devices throughout the school system—The advantages are consistency, a similar experience for all students, easier technical support, easier browser-platform compatibility, and easier professional development and support.
 - b. Multiple devices throughout the school system—The advantages are the ability to leverage purchases from previous years (less costly), and ability to create differential arrangements (i.e., labs and mobile devices in classrooms).
- Assess the features of devices to be used.
 - a. Monitor/display size: tablets vs. laptop vs. desktop
 - b. Mouse vs. touchpad vs. touch screen
 - c. Battery life of mobile devices—accessories for recharging, including during a testing period
 - d. Headphone capability
 - e. Separate keyboard
- Device storage and transportation considerations:

Implementing Common Core Assessments

- a. Do devices need to move from school to school? Will need a storage, delivery, inventory, and security plan.
- b. Do devices need to move from classroom to classroom? Will need storage carts with rollers.
- Device preparation considerations:
 - a. Ensure delivery with at least three to six months to unpack, image, meet local technology access guidelines, and practice with the device.
 - b. If the devices are to be used for test administration only, the school or district will need a plan for storing the devices when not in use, and preparing the devices (i.e., charging, updating operating systems and software) as the next testing period approaches.
 - c. If the devices will be used for instructional purposes in between testing periods, the district will need to conduct device maintenance prior to testing, including screen and keyboard review and review of applications that may have been downloaded, which could interfere with device performance during testing or could jeopardize test performance or privacy.
 - d. If the device is normally used for instructional purposes, plans will need to be made for how instruction is pursued when the device is being used for assessment purposes.
 - e. The preparation process could take multiple weeks, depending on the condition of the devices and the staff available.
- Name a district test coordinator.
 - a. In addition to traditional skills (e.g., organizational, scheduling, managing school coordinator training, ensuring test procedures are followed, etc.), the district test coordinator will need to have skills to assist school coordinators with opening testing sessions, password management, student access to enter in their IDs, and using technology support staff to respond to technological glitches as they occur.
 - b. The district test coordinator also develops summary test administration support documents and indexes for school-level test coordinators.

Exhibit 3. Timeline for Non-Instructional Support Preparations

Month	Function	Strategy	
September	Technology	 Coordinate with Instruction to develop device and FF&E standards. Perform gap assessment of each school against the standard. Review internal configuration and deployment capacity to determine if contracted support is needed. 	
		Review school based device inventory and asset management. Define requirements for the programment process.	
	Facilities	 Define requirements for the procurement process. Perform electrical engineering assessment. 	
	Tacinues	 Perform electrical engineering assessment. Define scope of work for contracting support and project management. 	
	Finance	 Allocate funds based on the gap assessment and needs determination. Review asset management policies and thresholds and determine if school devices will be inventoried in central financial system or in a school based system. Review warranty and insurance policies and contracts. 	
	Security	Review schools for device security and school envelope security requirements needed for procurement scope.	
	Procurement	 Review all current term agreements and research potential consortium and state contract opportunities. Define acquisition plan to identify where competition is possible and where consortium contracting is necessary. 	
	Assessment	 Finalize annual district assessment calendar. Identify building level assessment coordinators and assessment teams. Conduct initial training for assessment coordinators to include overview of district assessment plan, state guidelines and protocols for testing, and specific training for fall assessments. 	
October	Technology	 Review internal technical and help desk support capacity. Review SLAs for schools for sufficiency of response time, and test internal capacity to support them at scale. 	
	Facilities	Establish project plan and engage program manager if internal capacity is insufficient to meet timeline.	
	Finance	 Centralize the budget or establish a cost allocation to school budgets. If a school asset tracking system is needed, establish requirements with Instructional and Technology leadership. 	
	Security	 Review internal staff capacity for nighttime asset protection. Review law enforcement agreements for response to alarms. 	
	Procurement	 Acquire through new bids or consortium purchase agreements for devices and equipment. Acquire additional resources as needed including configuration support, warranty modification, and asset management systems. 	
	Assessment	 Collaborate with technology on review of school based technology inventory and device readiness for conducting computer based assessments. Ensure teachers and students utilize practice items as part of the normal instructional program to ensure students develop familiarity with college- and career-ready item types including short answer and extended response items and performance based tasks. 	
November	Technology	 Identify and hire additional support as needed for configuration and deployment, and for technical help to schools (if internal staff is preferred). Review procedures to support response time defined in SLAs. 	

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		 Align decentralized support, including staff and issue tracking, to ensure standards will be met for SLAs.
	Facilities	Begin modification of electrical requirements as needed.
	Security	Perform physical security modifications at high priority schools.
	Procurement	Monitor supply chains to ensure vendors are on track to meet device volume requirements.
	Assessment	Develop school based assessment plan for spring testing to include teacher training for spring testing, device deployment and student familiarity with assessment conditions.
December	Technology	 Train staff on new procedures to support response time and support standards for testing program. Establish school roll out plan for delivery and setup. Establish asset tagging and inventory plan to support device deployment.
	Facilities	Finish electrical modifications.
	Security	• Establish any changes to alarm response and law enforcement MOUs.
	Procurement	Monitor supply chains to ensure vendors are on track to meet device volume requirements.
	Assessment	Train teachers and staff on the use of embedded accessibility and accommodations features for computer based assessments and ensure the weekly use of these tools with students.
January	Technology	 Receive and deploy new devices and equipment. Asset tag all new devices and equipment. Implement the asset management program for schools (if needed) and load all asset information.
	Facilities	Adjust electrical load and access needs as deployment of devices takes place.
	Security	Perform concurrent asset risk review to ensure deployed devices have identified theft protection support.
	Procurement	 Assist Technology team in the accounting for devices received. Identify any contingency procurement that has to be performed for any areas where shortfalls may exist. Ensure an overall contingency is established for rapid replacement of devices that fail.
	Assessment	 Conduct training for school based assessment coordinators on spring testing protocols. Work closely with technology to ensure school based device deployment meets school needs based on school testing plans. Revise school spring testing plans as needed.
February	Technology	Perform configuration and load tests of the devices and testing labs with Instructional staff.
	Facilities	Adjust electrical load and access needs as deployment of devices takes place.
	Assessment	 Begin to check devices daily for necessary refresh of devices and peripherals (e.g., mice, keyboards, etc.). Ensure school based assessment coordinators re-deliver training for spring assessments to school staff.
During Testing	Technology	Work with assessment staff to establish a command center to quickly address technology and assessment concerns as they arise.
	Assessment	Work with assessment staff to establish a command center to quickly address technology and assessment concerns as they arise.

Common Core Resources from the Council of the Great City Schools

Common Core Resources from the Council of the Great City Schools

- Grade-level Instructional Materials Evaluation Tool—Quality Review (GIMET-QR), 2014
- Implementing the Common Core Assessments: Challenges and Recommendations, 2014
- A Framework for Raising Expectations and Instructional Rigor for English Language Learners, 2014
- Beyond Test Scores: What NAEP Data Tell Us about Implementing the Common Core Standards, 2014
- Communicating the Common Core Standards: A Resource for Superintendents, School Board Members, and Public Relations Executives, 2013
- Common Core Calendar of Questions, 2013
- <u>Staircase: Explaining the Common Core State Standards</u> (Three Minute Video in English and Spanish), 2013
- <u>Staircase: Explaining the Common Core State Standards</u> (30-second Public Services Announcement in English and Spanish), 2013.
- Implementing the Common Core State Standards: Year Two Progress Report from the Great City Schools, 2013
- Parent Roadmaps to the Common Core in English Language Arts, Grades K-12 (English and Spanish), 2012
- Parent Roadmaps to the Common Core in Mathematics, Grades K-12 (English and Spanish), 2012
- From the Page to the Classroom: Implementing the Common Core State Standards— English Language Arts and Literacy (Professional Development Video), 2012
- From the Page to the Classroom: Implementing the Common Core State Standards— Mathematics (Professional Development Video), 2012
- Common Core State Standards and Diverse Students: Using Multi-tiered Systems of Support, 2012
- Implementing the Common Core State Standards: Progress Report from the Great City Schools, 2012

Assessment Implementation Working Group

Implementing Common Core Assessments

Assessment Implementation Working Group*

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^{*} Special thanks to Michael Eugene, Chief Operating Officer, Orange County Schools for his thoughtful comments and additions to the document.

SCHOOL IMPROVEMENT GRANTS

The School Improvement Grant Program: Analysis of Performance in America's Great City Schools

Council of the Great City Schools Fall 2014

QUANTITATIVE STUDY

Purpose

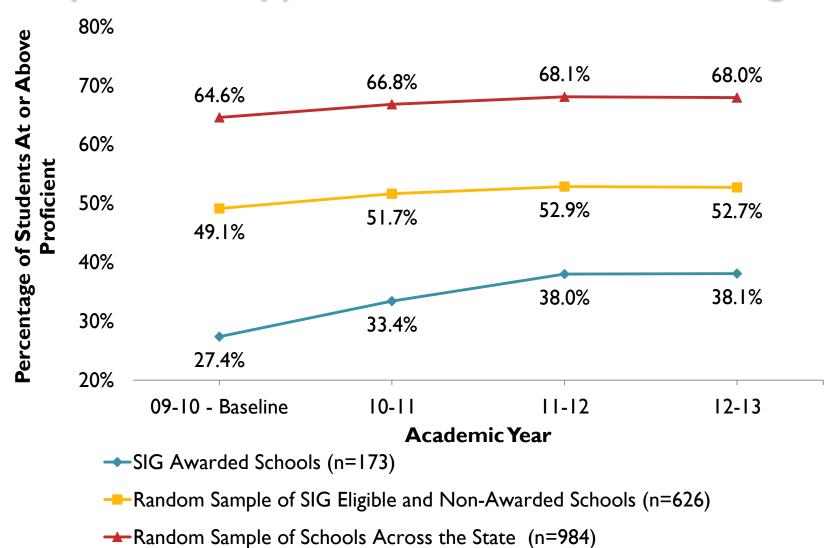
- Examine trends in performance for schools across the country that received SIG awards as part of the American Recovery and Reinvestment Act of 2009 (ARRA)
- Analyze performance for schools receiving grant awards (SIG Award Schools) compared with:
 - SIG Eligible Schools those schools deemed eligible for SIG awards, but not receiving any funding in Cohort I or Cohort 2 of the award cycle;
 - Non-SIG Eligible Schools those schools across the country not eligible for SIG funding due to higher levels of student achievement.

Methodology

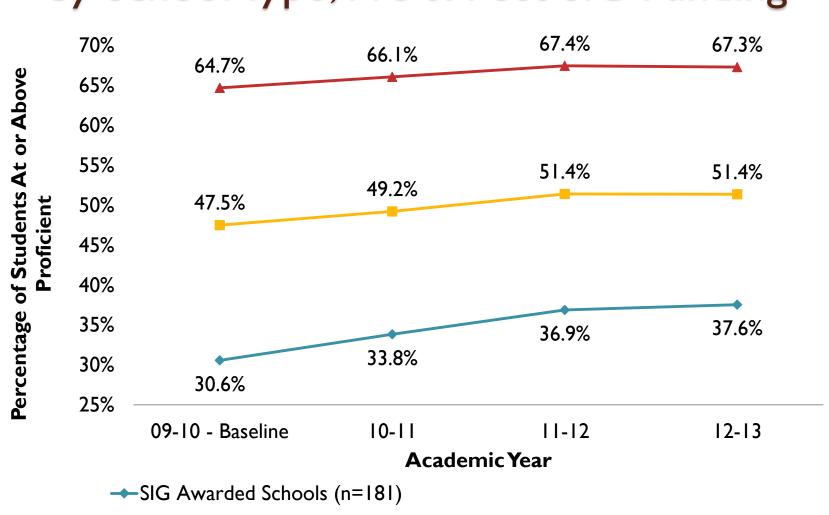
- Grades 3-8 Trends
 - Change in Percentage of Students At or Above Proficient
 - Percentage of Schools Increasing the Percentage of Students At or Above Proficient by level of improvement:
 - No Improvement
 - 1% to 4%,
 - 5% to 9%,
 - 10% or more
 - Change in Percentage of Students Below Basic
- 2012-2013 Sample
 - 13 CGCS States
 - 21 CGCS Districts
 - States were excluded based on three criteria:
 - I. Fall Testing Dates
 - Changes in State Assessments (Content and/or Cut Scores)
 - 3. No Data or Poor Data Quality

GRADES 3-8 TRENDS

Percentage of Students Proficient in Math by School Type, Pre & Post SIG Funding

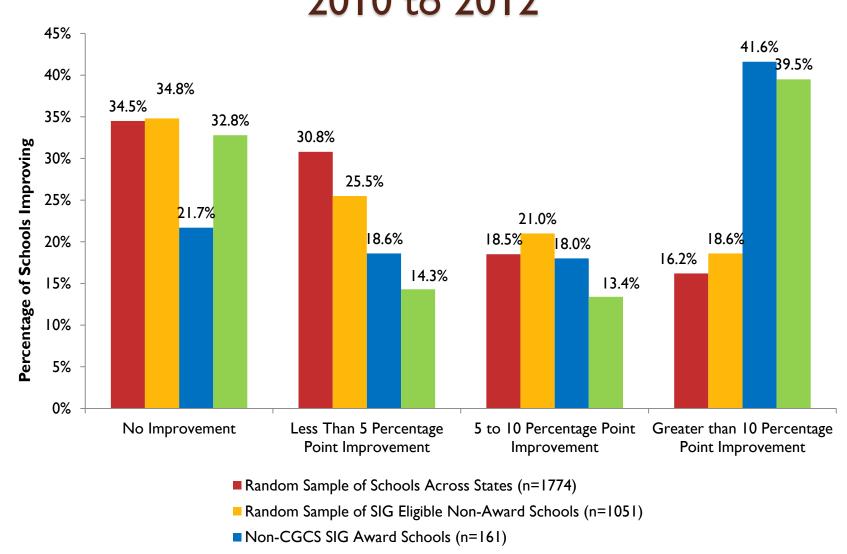


Percentage of Students Proficient in Reading by School Type, Pre & Post SIG Funding



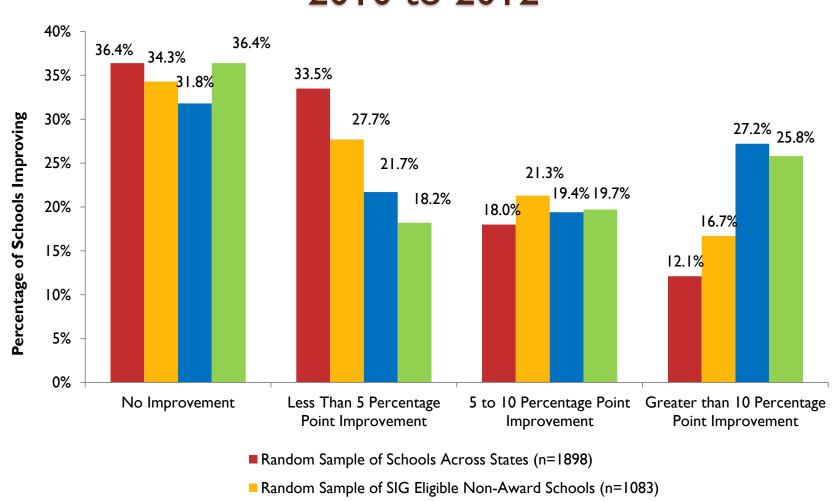
- --- Random Sample of SIG Eligible and Non-Awarded Schools (n=628)
- → Random Sample of Schools Across the State (n=986)

Percentage of Schools Improving in Mathematics by Category and School Type, 2010 to 2012



■ CGCS SIG Award Schools (n=119)

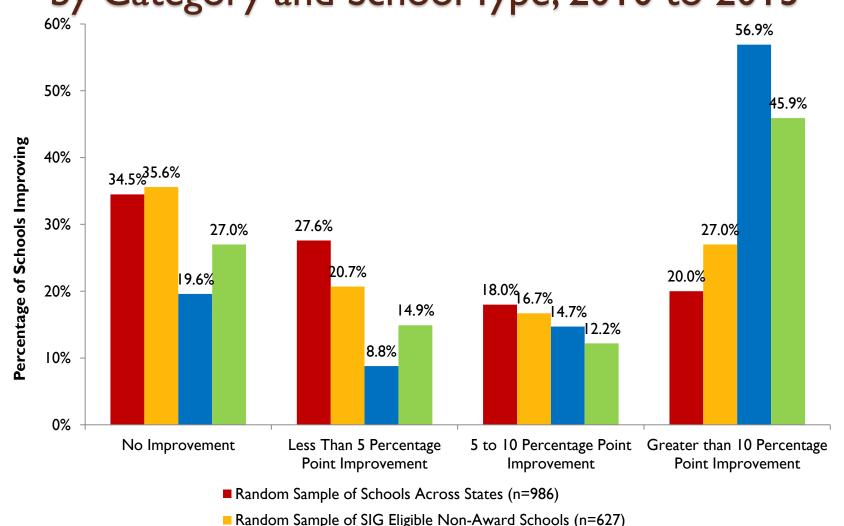
Percentage of Schools Improving in Reading by Category and School Type, 2010 to 2012



■ Non-CGCS SIG Award Schools (n=217)

■ CGCS SIG Award Schools (n=132)

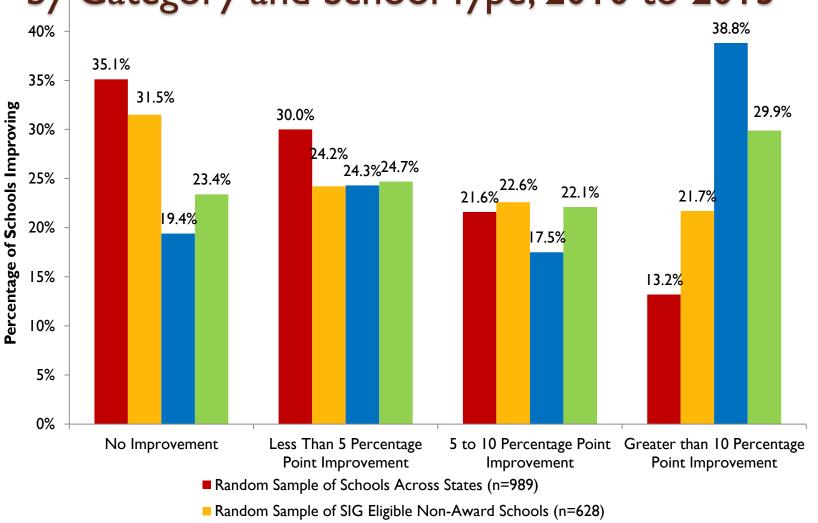
Percentage of Schools Improving in Mathematics by Category and School Type, 2010 to 2013



■ Non-CGCS SIG Award Schools (n=102)

CGCS SIG Award Schools (n=74)

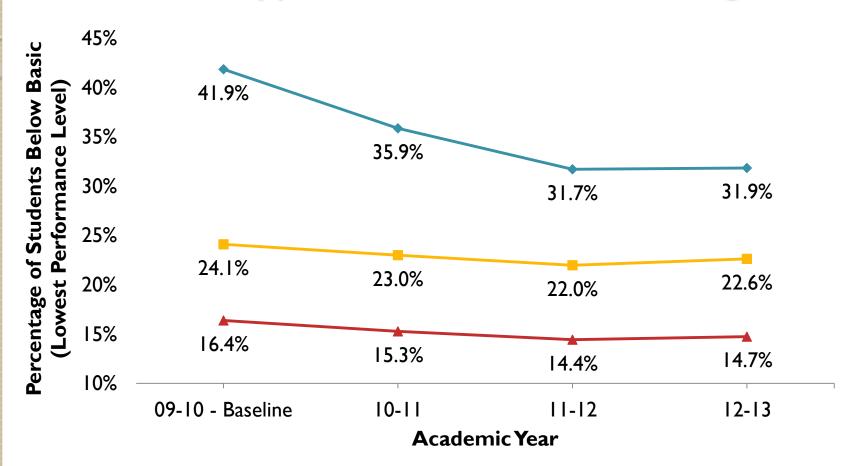
Percentage of Schools Improving in Reading by Category and School Type, 2010 to 2013



■ Non-CGCS SIG Award Schools (n=103)

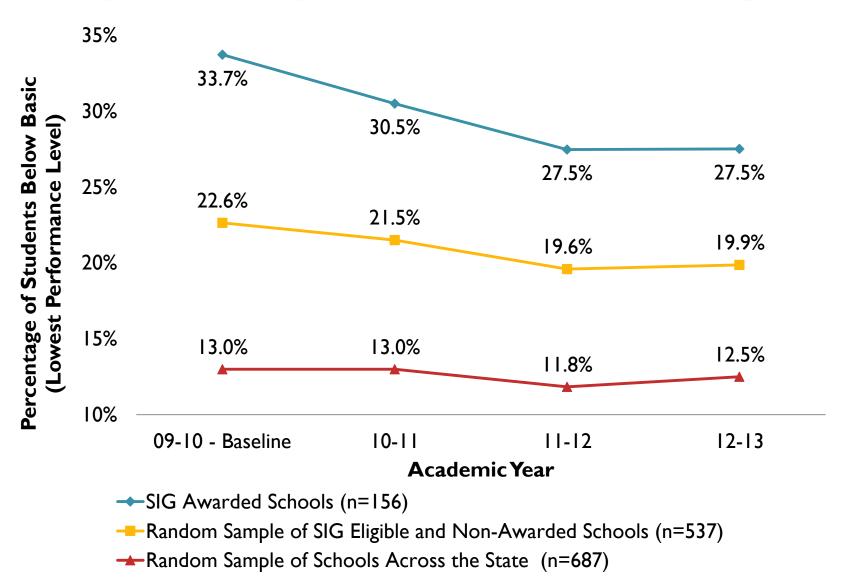
■ CGCS SIG Award Schools (n=77)

Percentage of Students Below Basic in Math by School Type, Pre % Post SIG Funding



- → SIG Awarded Schools (n=156)
- --- Random Sample of SIG Eligible and Non-Awarded Schools (n=535)
- Random Sample of Schools Across the State (n=686)

Percentage of Students Below Basic in Reading by School Type, Pre & Post SIG Funding



QUALITATIVE STUDY

Purpose

- The Council of the Great City Schools examined how member districts were implementing School Improvement Grants (SIG) that were funded through the American Recovery and Reinvestment Act of 2009 (ARRA). What were the effects of the program on student achievement?
- Districts were chosen for case studies based on state test scores in math and reading, following an analysis of Cohort I data. Some districts were chosen because they showed increases in scores; others were chosen because they showed no changes or decreases.
- The Council's research team interviewed central-office staff and school-based personnel who were involved in the design and/or implementation of the grant between 2009-2013.

Research Questions

The research team was interested in the following research questions

- 1. What was the political and organizational context of the district during the SIG implementation? What were the districts' instructional areas of focus during the study period?
- 2. What were the school goals and objectives beyond state and district objectives during that period, and what was the process for setting those goals?
- 3. What kind of interventions were put in place to improve academic performance in the SIG schools?
- 4. How were the grant-funded schools held accountable for student achievement? What measures were used?
- 5. What professional development was available for teachers and administrators to address the academic needs of students and special populations performing poorly?
- 6. What are school and district plans for sustaining programs and processes implemented with SIG funding?

Districts Interviewed

- Cleveland
- Columbus
- Denver
- Miami-Dade County
- Milwaukee
- Philadelphia
- San Francisco
- Seattle

KEY FINDINGS

Political and Organizational Context

Prior to SIG, respondents reported that there were:

- Few support structures in place for low performing schools
- No clear direction or organization
- Frequent changes in leadership, and
- Few high-quality interventions in the lowest performing schools.

Post SIG, respondents reported that there were:

- Many schools that developed turnaround plans
- Inconsistent initiatives across buildings--few districts developed cohesive plans to address the needs of all SIG schools
 - Schools were often siloed within the districts
 - Turnaround schools could opt out of district curriculum
 - Inconsistent performance
- Little consistent direction or organization across schools
- State intervention was irregular and often not coordinated with the district.

Goals and Objectives

School goals included:

- Building a strong support team
- Building teacher buy-in and ownership throughout the turnaround process
- Becoming better users/consumers of data
- Improving student achievement
- Building relationships with the community
- Improving parent engagement
- Improving school climate and morale
- Increasing student attendance and decreasing student suspension rates
- Setting higher expectations for students by increasing the rigor of instruction
- Enhancing curriculum materials
- Providing professional development on instructional practices and data uses

Staffing

Districts used SIG funding to address personnel concerns:

- Hiring turnaround principals
- Working with teacher unions to:
 - Manage staff turnover process—ensuring low performing schools attracted high quality teachers, and
 - Extend school days and professional development hours while working on a joint understanding of the unique needs of low performing schools.
- Developing unique administrative structures to support low performing schools (i.e., specific school regions or "chancellors district"-like structures)
- Hiring:
 - instructional supervisors/coaches
 - reading and math specialists
 - social workers/counselors
- Engaging parents and the community
- Ensuring the fidelity of grant implementation

Interventions

Schools targeted grant funds on student learning by:

- Increasing school partnerships with community organizations
 - AVID
 - City Year
 - College Summit
 - Teach for America
 - Peace Corps
 - Communities in Schools
- Reducing class sizes
- Hiring part-time tutors to support struggling students
- Implementing a new and more rigorous curriculum--often with a literacy focus
- Extending school-day time
- Adding after-school, intercession, and summer enrichment programs
- Providing incentives for teachers to improve student performance
- Increasing professional development hours for teachers

Professional Development

Schools supported staff by:

- Providing extensive professional development to support SIG initiatives
- Focusing on data use
- Developing an embedded professional development model, e.g., co-teaching with veteran or "strong" teachers
- Improving tools to support teachers (i.e., dashboards, planning tools, etc.)
- Allotting time for feedback from teachers and other school leaders
- Increasing professional development hours with an emphasis on job-embedded support

Accountability

States and districts held schools accountable by:

- Conducting classroom walkthroughs with school, district, and state leaders—
 - But there was inconsistent implementation within buildings
 - And classroom observations were less punitive and more informative and supportive
- Using assessments to improve classroom instruction and determine interventions in addition to teacher evaluations
- Implementing more focused weekly supports and review systems in low performing schools

° CONCLUSIONS

Challenges and Opportunities

Challenges

- Grant was a temporary solution for larger systemic issues
 - lack of high quality intervention programs
 - difficulty recruiting and retaining high quality teachers
- Loss of staff that were hired through SIG
- Once funding is gone, few plans for support remained
 - across school buildings
 - from district and state leaders

Opportunities

Districts and schools may continue to:

- Foster partnerships with organizations to support schools
- Collaborate with central office staff and seek support
- Focus on data to inform instruction
- Engage parents and the community
- Provide support to teachers through professional development.

When It Worked and When It Didn't

When It Worked

- A clear coherent districtwide plan for turning around low performing schools.
- Central office supported low performing schools.
- Schools provided flexibility in making staff changes/removing poor performing teachers.
- Well coordinated and targeted interventions and supports for struggling students.
- Leveraging data to identify professional development for teachers.
- Teachers had clear understanding of challenges and commitment needed to succeed.

When It Didn't

- Disconnected districtwide plans that often resulted in the lack of a coordinated strategy.
- State and central office administrators focused on grant compliance, not coordination.
- Redundant or contradictory state and local intervention efforts
- Schools had difficulty removing poor performing staff or hiring stronger teachers.
- Excess flexibility for the capacity of the school.
- Little evaluation of intervention efforts, and/or leaders were not always clear about the benefits of intervention programs.
- Weak instructional interventions

ACHIEVEMENT TASK FORCE

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Achievement

2014-2015

Task Force Goal

To assist urban public school systems in teaching all students to the highest academic standards and in closing identifiable gaps in the achievement of students by race.

Task Force Chairs

Cecilia Adams, Toledo School Board Eric Gordon, Cleveland CEO

Members

Laurie Rich Levinson, Broward County School Board Airick West, Kansas City School Board

ACADEMIC DEPARTMENT OVERVIEW



Academic Department Overview October 2014

Overall Academic Department Goals/Priorities

The goal of the academic department is to support the work of urban districts to improve student achievement for all students in our member districts. The department collaborates with researchers to determine district systems and resources that correlate with improved student achievement. These results inform our recommendations to instructional leaders.

We share high-leverage information through videos and publications, and we provide onsite strategic support teams, webinars, job-alike conferences and workshops. Additionally, we facilitate networking and collaboration among our members.

Major efforts this year focus on supporting our members with the implementation of the Common Core State Standards (or college and career-ready standards), advancing the development of academic key performance indicators for determining cost effective processes to guide district budgetary decisions, and piloting of tools for alignment of instructional materials.

Update on Activities/Projects

> Academic Key Performance Indicators

Overview

The Council received a grant from the Bill and Melinda Gates Foundation to develop 20-25 academic key performance indicators (KPIs). The process is similar to the one used to develop operational KPIs. Three sub-committees have met to engage members in drafting KPIs for general education, special education, and English language learners.

Update

The list of potential KPIs has now been prioritized and indicators, where possible, link to costs and/or outcomes. A survey form has been completed to gather district data for the KPIs. The general education KPI committee met during the Curriculum and Research Directors Conference in July 2014 to review the work to date. The academic KPIs will be piloted in volunteer districts this fall to check the clarity and usefulness of initial academic key performance indicators.

> Implementing the Common Core State Standards

Overview

The Council has long advocated for shared standards across states. The Council has received several grants to assist our members in implementing the new standards. In

August 2011, CGCS received a three-year grant from the Bill & Melinda Gates Foundation to support implementation of the Common Core State Standards. While this grant is nearing completion, we have received additional grants that will be described below. The Council is working with member districts and strategic partners to coordinate and deepen successful implementation of the new K-12 standards in mathematics, English language arts and literacy, and science. The Council uses grant funding to enhance its academic support to members and to create and share a powerful selection of tools and videos for internal and external stakeholders.

Update

Gates 2011 Grant

The Council conducted an analysis of National Assessment of Educational Progress (NAEP) items that are aligned to the level of work required by the Common Core. The analysis reveals that our students are not yet performing at the level required by the Common Core. To support our members, the Council developed the booklet, "Beyond Test Scores: What NAEP Results Tell Us About Implementing the Common Core in Our Classrooms." This booklet analyzes selected released 2013 NAEP items and responses together with their implications for classroom instruction and for central office action. The information can be used to refine district plans, coach and support teachers and other instructional staff, and make the necessary shift of focus from what the standards are to how to help students achieve them.

Hewlett Grant for the development of Grade-Level Instructional Materials Tool-Quality Review (GIMET-QR)

In August 2013, CGCS received a two-year grant from the Hewlett Foundation to develop grade-by-grade rubrics to further operationalize the Publisher's Criteria in English language arts and literacy and in mathematics. Student Achievement Partners used the Publisher's Criteria to design its Instructional Materials Evaluation Tools (IMET). Those rubrics address spans of grade levels and include a set of non-negotiables and alignment criteria.

We believe there will never be a perfect textbook that meets all the needs of every district. Once a textbook series meets the non-negotiables in the IMET, districts will still need to examine the screened materials for the level of alignment within each grade level and the quality with which the materials address the learning aligned to the standards. The Council used Hewlett funding to develop grade-by-grade rubrics consistent with textbook adoption procedures used in urban districts. For each grade level, these rubrics amplify selected non-negotiable areas and alignment criteria so that districts can discriminate which textbook or sets of materials best fit the needs of the district. They will also help districts determine how priority areas to support the use of the classroom materials the district decides to adopt. The rubric, called the *Grade-Level Instructional Materials Tool-Quality Review (GIMET-QR)*, dovetails with the set of requirements for English language learners, *A Framework for Raising Expectations and Instructional Rigor for English Language Learners*, concurrently developed under the leadership of Gabriela Uro.

The GIMET-QR was developed by a group of expert curriculum leaders that met January 27-28, 2014, to set parameters and begin writing draft rubrics for each grade level in mathematics and English language arts and literacy. The ELA team met for a second time May 20-21 to refine and recalibrate the rubrics based on the IMET revisions that were released in April of 2014. The mathematics team met virtually to revise and refine both the grade level rubrics and the review criteria used to distinguish between texts during the week of June 9-13, 2014.

The most recent prototype of the GIMET-QR was shared with the CGCS English Language Arts/Literacy and Mathematics Advisory Committee and curriculum directors for their initial responses and feedback during the Curriculum and Research Directors' Meeting in July 2014. This initial review and feedback process led to additional improvements to the revised draft that will be piloted during the fall. A kindergarten draft will be shared at the Fall Conference in Milwaukee. The Council will notify curriculum leaders as other levels are posted on our website.

Gates Working Groups Grant

The Council is the recipient of a 2014 grant from the Bill and Melinda Gates Foundation to help districts align common core implementation with other key reforms in effective teaching and other areas, as well as with efforts to prepare for new online assessments aligned to college and career-ready standards. The project involves a cross-functional team of academic, research, assessment, technology, and operations staff from member school systems supported by Council staff. The Council will also identify experts in key areas that could advance the work and an external consultant for project management.

The first working group met June 9-10, 2014, to build recommendations for districts that will be administering on-line tests this spring for PARCC or Smarter Balanced. The product of this working group was the draft document, *Implementing the Common Core Assessments: Challenges and Recommendations*. This draft provides a summary of the PARCC and SBAC assessments, challenges in implementing the new assessment, and recommendations for successfully implementing them.

On October 1-2, 2014, the second working group convened to collaboratively discuss and inform the development of implementation tools and make recommendations for steps districts might take to integrate, collaborate on, and monitor the effectiveness of the implementation of their multiple reform efforts.

Moving the Work to the Classroom Level

CGCS and Achieve facilitated several webinars on using the EQuIP quality review process for ELA and mathematics that culminated in a one-day conference session on the EQuIP unit planning process and the student work protocol for mathematics and ELA on March 7, 2014 in Baltimore. Participants engaged in activities and tasks that required them to:

• apply the EQuIP Rubrics to evaluate the quality and alignment of instructional units and lessons to identify specific ways to strengthen them;

- apply the EQuIP Student Work protocol to examine student work to inform the evaluation of the quality and alignment of instructional materials;
- collaborate on ways to integrate the EQuIP tools and processes into existing professional development structures; and
- begin conversations about evidence of student proficiency and implications for instruction.

> Common Core Website

The Council launched a website where districts and organizations can share high quality materials. Several districts have come forward to offer sample professional development and curriculum materials to be posted on a secure portal of the Common Core website (www.CommonCoreWorks.org) this fall. Materials are being collected for these categories:

- Implementation plans/tools
- Communication tools/plans
- Curriculum (including models, units of study, etc.)
- Professional Development
- Exemplars of student work
- Progress Monitoring

CGCS has placed many materials on its website to support district implementation of the Common Core.

A series of questions about on-going Common Core implementation called a
"Calendar of Questions" arranged by month, focusing on particular aspects of
implementation for staff roles at various levels of the district, as well as for parents
and students.

http://cgcs.org/Page/409

- A resource guide "Communicating the Common Core State Standards: A Resource for Superintendents, School Board Members, and Public Relations Executives", that helps district leaders devise and execute comprehensive communication plans to strengthen public awareness about and support for college and career-readiness standards.
- Two 30-second Public Service Announcements (one in English and one in Spanish) that tells the public what the Common Core Standards are.

http://www.commoncoreworks.org/Page/379

• Two three-minute videos (one in English and one in Spanish) that explains the Common Core in a slightly longer form. This is particularly good for presentations to community and parent groups.

http://www.commoncoreworks.org/Page/378

 A 45-minute professional development video for central office and school-based staff and teachers on the shifts in the Common Core in English language arts and literacy. The video can be stopped and restarted at various spots to allow for discussion.

http://www.commoncoreworks.org/domain/127

• A 45-minute professional development video for central office and school-based staff and teachers on the shifts in the Common Core in mathematics. The video can be stopped and restarted at various spots to allow for discussion.

http://www.commoncoreworks.org/Page/345

• A series of parent roadmaps to the Common Core in English languages arts and literacy, grades k-12 in English and grades k-8 in Spanish.

http://www.commoncoreworks.org//site/Default.aspx?PageID=330 (English)

http://www.commoncoreworks.org//site/Default.aspx?PageID=365 (Spanish)

• A series of parent roadmaps to the Common Core in mathematics, grades k-12 in English and k-8 in Spanish.

http://www.commoncoreworks.org//site/Default.aspx?PageID=366 (English)

http://www.commoncoreworks.org//site/Default.aspx?PageID=367 (Spanish)

• Classroom tools for adapting basal texts to the rigor of the Common Core in English language arts and literacy (scroll down to the bottom for directions on signing into EdModo):

http://www.commoncoreworks.org/domain/112

Classroom tools and videos for teaching fractions across grades three through six.
 http://www.commoncoreworks.org/domain/120

• A white paper outlining the key components of an integrated, multi-tiered system of supports and interventions needed by districts in the implementation of the common core. "Common Core State Standards and Diverse Urban School Students: Using Multi-tiered Systems of Support"

http://www.commoncoreworks.org/domain/146

• A 10-minute video of a New York City kindergarten ELL classroom illustrating Lily Wong Fillmore's technique for ensuring that all students can access complex text using academic vocabulary as students study the metamorphosis of butterflies.

http://www.commoncoreworks.org/domain/135

Note: Other organizations have also linked our materials to their websites including the Council of Chief State School Officers, Math Forum, Student Achievement Partners, and NBC's Education Nation.

➤ Building Awareness and Capacity of Urban Schools

The department focuses strategically on projects that will benefit our members as they move forward with common core and with improving student achievement. First, we are working directly with the writers to ensure a shared understanding of the intent of the standards and the instructional and curricular shifts that they require. Then, we are focused on enhancing the knowledge base of district curriculum leaders to inform their implementation planning and action steps regarding major implementation systems, including professional development, assessments, instructional resources, and student work products.

English Language Arts Writing

- On May 27-28, 2014, the Council and Student Achievement Partners partnered with the Anchorage School District and Alaska Department of Education and Early Development to convene a professional learning experience that focused on aligning materials and instructional practices to the common core. District writing teams brought text selections and practiced evaluating existing questions for alignment and writing good text-dependent questions to sources.
- On June 12-13, 2014, The Council and Student Achievement Partners together with the Vermont Writing Collaborative were asked by Hawaii Department of Education to convene a common core conference that focused on using the principles of backward design to plan instruction for students. Participants examined the three types of writing in the CCSS—argument/opinion, informative, and narrative—and how they develop across grade levels using samples from the web-based *In Common Resource* developed by the Vermont Writing Collaborative. Participants also examined how the Student Achievement Partners' draft *Instructional Practice Guides in English Language Arts/Literacy and Mathematics* can be used as tools to guide teacher reflection, peer coaching, and professional development to support shifting instructional practices.
- The Council convened a **two-day writing conference** in Portland, Oregon on **August 25-26, 2014**, to focus on argumentative writing. This August conference focused on deepening the knowledge of writing instruction that has been previously presented at writing retreats.
- The Council and Student Achievement Partners co-sponsored the launching of the Text-Set Project in Chicago, IL on September 16-17, 2014. The Text Set Project is a professional learning opportunity that involves coaching and support in selecting the books and articles that could form a solid text set, learning how to sequence the set effectively, and how to support students in building knowledge about the world, words and language structure as they read the texts for themselves.

District teams will produce text sets that are comprised of annotated bibliographies, suggested sequencing of texts, as well as suggested to provide a coherent learning

experience for students. This is accompanied by teacher instructions and supports, as well as a variety of suggested tasks for ensuring students have learned from what they have read.

Expert reviewers will work with each production team remotely to review the materials and coach the team until the Text Sets are ready to be published free of charge on line.

Read-Aloud Project (RAP) for K-2

As an outgrowth of the Basal Alignment and Anthology Alignment Projects, the Council together with Student Achievement Partners launched the Read-Aloud Project (RAP) for grades K-2. Participating districts bring teams of curriculum, English language learning specialists, and Special Education staff for two days of training and then take ownership for writing text-dependent questions to go with chapter and picture books they select. This training includes how to locate, select and evaluate good informational articles and books to group as sets to connect to the read-aloud anchor.

More than 80 participants attended the first session, held on December 12-13, 2013, in Atlanta. A duplicate RAP Conference was held on April 28-29, in Los Angeles so that members could select the most convenient location and schedule. Vetted RAP resources are posted on Edmodo as they are written and reviewed in the same manner as BAP and AAP materials.

Reading Projects

- The Council and Student Achievement Partners co-sponsored a Combination Conference for RAP, BAP, and AAP in Clark County on January 23-24, 2014, to provide a K-12 systemic approach to implementing Common Core in English Language Arts/Literacy.
 - Materials written by past participants have been vetted and are now posted free of charge under "Basal Alignment Project" for grades 3-5 and "Anthology Alignment Project" for grades 6-10 on the Edmodo education site at www.edmodo.com. School district staff and teachers, publishers, education organizations and others continue to link to the site, download materials, and adapt them as they wish. These materials utilize readings from currently adopted textbooks but revise the questions that accompany the text to align with Common Core requirements.
 - o Both BAP and AAP sites continue to post new materials and tools aligned to the Common Core. To date, the Basal Alignment Project Group has grown to over 45,600 members with over 300 revisions posted on Edmodo. The AAP group has over 8,200 members with approximately 200 AAP revisions posted.
 - The first wave of more than 80 RAP lessons have been vetted and are posted on Edmodo. The RAP group has grown to nearly 2200 members.

Mathematics and Science

- In March 2014, the Council notified members of a newly-released mathematics progression. "Commentary and Elaborations on the Standards for Mathematical Practice, Grades K-5" which clarifies how to incorporate mathematical practices along the K-5 continuum.
- The Council partnered with several member districts to submit a review of draft science tasks aligned to the Next Generation Science Standards in November 2013.
 Teams of math and science district leaders worked to provide quality feedback on the integrated mathematics and science tasks.
- The Council is partnering with a University of Chicago team at the Center for Elementary Mathematics and Science Education to review and provide feedback on a toolbox for K-12 teachers, administrators and district leaders. This toolbox, available by March 2015, will help urban districts make decisions about improving computer science education at scale.

Next Generation Assessments

Overview

The Partnership for Assessment of Readiness and College Careers (PARCC) and the Smarter Balanced Assessment Consortium (SBAC) are designing the next generation of assessments that will measure student mastery of the Common Core. These assessments were piloted in the spring of 2014. We continue to alert member districts as new materials are released by the Consortia. The Council's Research Department is taking the lead on assisting members in preparing for administration of the new assessments.

> Curriculum and Research Directors Conference

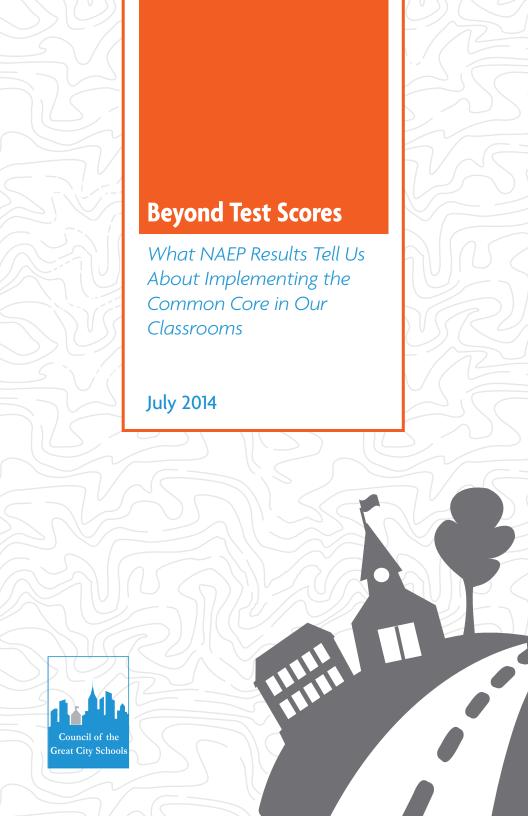
The Curriculum and Research Directors Conference met in Los Angeles, CA from July 23-26, 2014. Discussions covered common core implementation, summative and formative assessments, analysis of selected 2013 NAEP items aligned with common core and their implications for classroom instruction, tools by which to determine the alignment with new standards and the quality of instructional materials, selecting materials for ELLs, new general education key performance indicators, progress on turnaround schools, disproportionality, and other topics. The next Curriculum and Research Directors' Conference will be held in Chicago, July 14-18, 2015.

➤ Harvard University-Council of the Great City Schools Leadership Institute

The Council of the Great City Schools (CGCS) and the Harvard Graduate School of Education (HGSE) see the need for a program to support early-career superintendents entering new positions, together with their new chief officers, and the need to boost the capacity of senior staff members to whom much of the work is often delegated. CGCS and HGSE are exploring the idea of a new executive education program for early career superintendents, their chief academic, financial, and operating officers, and aspiring line administrators. New superintendents, together with their chief officers and staff,

are often under tremendous pressure to start their work with an aggressive agenda for reform and improvement, but often lack a clear mandate or path forward. They must quickly address critical issues – including capacity building and strategic planning – that drive student achievement, and they must do this in a highly-charged political landscape, responding to the expectations of their school boards and other stakeholders. The summer institutes designed to address critical areas for superintendents and chief academic officers will begin in the summer of 2015. An outline of the two institutes will be shared at the Achievement Task Force Meeting during the Fall Conference in Milwaukee.

BEYOND TEST SCORES



About the Council

The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 67 large city school districts, its mission is to promote the cause of urban schools and to advocate for innercity students through legislation, research, instructional support, leadership, management, technical assistance, and media relations. The organization also provides a network for school districts sharing common problems to exchange information and to collectively address new challenges as they emerge in order to deliver the best education for urban youth.

Chair of the Board

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Chair-Elect

Richard Carranza, Superintendent San Francisco Unified School District

Secretary/Treasurer

Felton Williams, Board Member Long Beach Unified School District

Immediate Past Chair

Valeria Silva, Superintendent St. Paul Public Schools

Executive Director

Michael Casserly Council of the Great City Schools

Beyond Test Scores

What NAEP Results Tell Us About Implementing the Common Core in our Classrooms

July 2014



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Overview

The Common Core State Standards (CCSS) require us to prepare students for college and careers in a new way, equipping them with a deeper understanding of concepts and skills in literacy and mathematics.

In English language arts and literacy, this means three major changes. Students will continue reading and writing. But in addition to stories and literature, students will read more texts that provide facts and background knowledge in areas such as science and social studies. They will read more challenging texts and be asked more questions that require them to refer back to what they have read and support their conclusions with evidence. And there will be an increased emphasis on building a strong vocabulary and understanding how language works so that students can master more challenging material.

The standards also call for three major changes in mathematics. Teachers will concentrate on teaching a more focused set of major math concepts and skills, and will use rich and challenging math content to engage students in solving practical, real-world problems. Additionally, students will need to explain the logic behind their solutions.

Under the new standards in both reading and math, students will be asked to demonstrate and apply what they have learned in ways that are fundamentally different from what was expected in the past. Moreover, college and career readiness will apply to all students, requiring that struggling learners, English language learners, and students with disabilities have access to high levels of instruction that will prepare them for success.

Unfortunately, a new analysis from the Council of the Great City Schools suggests that our students are not yet performing at levels expected by the new standards. The Council analyzed items from the 2013 National Assessment of Educational Progress (NAEP) that were similar in structure, rigor, and complexity to the requirements of the common core standards, as well as sample assessment items released by the Partnership for Assessment of Readiness for College and Careers (PARCC) and the Smarter Balanced Assessment Consortium (SBAC). In general, the results on NAEP show too many students nationwide and in urban public schools are not

yet equipped with the knowledge and skills they will need to be successful.

Of course, any analysis of this kind that compares two different systems for measuring student learning and progress faces inherent challenges. NAEP and the common core standards and assessments are designed to serve different purposes. While the common core is intended to bring coherence to the academic functions of school systems—curriculum, assessment, and instruction—in order to create and promote a common high standard for teaching and learning, NAEP is intended only to provide a way to measure and compare student performance across states and districts.¹ This means that each individual item is a particular, partial expression of a more general goal, idea, or set of goals. Moreover, there are dimensions of challenge within the CCSS that NAEP is not well suited to measure. For example, in mathematics, the common core extends beyond NAEP in its focus on rational number algebra, mastery of arithmetic, and rich modeling tasks.

However, NAEP still provides a useful context where the skills measured overlap, and in this analysis we have endeavored to identify and deconstruct sample NAEP items that are most like the ones students will be seeing in their classwork and on the new assessments. In this booklet, the Council lays out these items—two mathematics items and two English Language arts items, shows how our students did on these questions, discusses what may have been missing from their instruction, and outlines what changes to curriculum and instruction might help districts and schools advance student achievement. It also poses a series of questions that district leaders should be asking themselves about curriculum, professional development, and other instructional supports.

The goal in presenting these data is not to try to predict how students will perform on upcoming assessments or to encourage schools to engage in "test prep." The standards require a fundamental shift in teaching and learning, and such short-sighted tactics would prove wholly inadequate to improve performance on the new assessments, much less to prepare students for the future. The goal here is to better articulate what needs to change in class-rooms, schools, and central offices in order to realize the full promise of the common core.

¹For a more detailed discussion of the differences in methodology and purpose between state educational standards, such as CCSS, and NAEP, see http://nces.ed.gov/nationsreportcard/about/comparing_assessments.aspx.

Evidence from NAEP Sample Item Analysis

Mathematics: Progress toward Standards and Implications for Curriculum and Instruction

One of the underlying ideas behind the new mathematics standards is an emphasis on a few fundamental concepts that deepen and evolve as students progress through their school careers. In practice, this means taking a concept that is introduced in an earlier grade and having students apply it and make connections with other concepts in later grades so that their sophistication and understanding of the concept continues to develop.

Fourth Grade

The following sample grade-four 2013 NAEP mathematics item illustrates this process of developing a student's understanding of a key concept—in this case, place value. In grade four, the common core standards require students to generalize place value understanding for multi-digit whole numbers, and integrate this knowledge with their understanding of the properties of operations to perform multi-digit calculations (4.NBT).²

These skills have been carefully developed over a student's previous years of mathematics work. Beginning in kindergarten, teachers help students build a foundation for place value by paying close attention to the number 10. Kindergarten students learn to compose (and decompose) numbers between 11 and 19 into 10 ones and some more ones (K.NBT). For example, kindergarten students visualize 14 ones as a ten with four more ones.

 $\underline{http://sampleitems.smarterbalanced.org/itempreview/sbac/index.htm}. \underline{and}$

http://epat-parcc.testnav.com/client/index.html#login?username=guest4&password=guest4.

²This item also reflects the complexity and structure of PARCC and SBAC sample items for mathematics. For example, one fourth-grade PARCC item asks students to determine the total number of beads in a bag of beads based on the relative number distributed to different students in a class (for example, the problem states that Trish has 4 times as many beads as Elena, etc.). The problem requires students to calculate a total using several mathematical sub-steps, just as seen in this NAEP item. For further analysis of the similarities between NAEP and PARCC/SBAC items see http://www.cgcs.org/domain/165. Sample PARCC and SBAC items for mathematics can be found at

In grade one, students continue deepening their understanding as they notice that the two digits of a two-digit number represent amounts of tens and ones, i.e., 25 is 25 ones or two tens and five ones (1.NBT). In fact, throughout the elementary grades, students will learn that place value is the same for both whole numbers and decimals. And while students continue building this mastery of place value, they simultaneously begin applying their understanding of the properties of operations to add, subtract, multiply, and divide whole numbers and decimals.

In grade two, students use place value understanding and properties of operations to add and subtract numbers between 1 and 1,000 (2.NBT). By grade three, students use place value understanding and properties of operations to perform multi-digit arithmetic (3.NBT).

Finally, by grade four, students should have the skills and knowledge to tackle a problem such as this:

2013 NAEP RELEASED MATHEMATICS ITEM, Grade Four

HOW BUTTONS ARE SOLD

Type	Number of Buttons
Box of buttons	1,000 buttons
Package of buttons	100 buttons
Card of buttons	10 buttons
Single button	1 button

10	CD1	1	1 1 .	1	C	
1.7	Iha	art tagahar	hought	huttone	toro	nroloot
14.	1110	art teacher	DOUZIII	Dullons	IUI a	DIOICUL

The teacher bought 1 box, 9 packages, 12 cards, and 5 single buttons.

How many buttons did the teacher buy altogether?

Answer: buttons

^{**}United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

In this item, students are required to apply strategies and properties based on place value to solve the problem and produce a short constructed response. There are no answer choices for students to consider. Students are required to interpret the information presented in the table to infer that if each package holds 100 buttons, then nine would hold 900 buttons (or nine hundreds).

Similarly, students would need to recognize that having 12 cards of ten buttons is the same as having 120 buttons. Students are expected to use this information to determine the total number of buttons that the teacher bought altogether.

Typical errors will include students incorrectly indicating that 12 cards = 12 buttons or nine packages = nine buttons. The following are sample student responses to this NAEP item.³

³Available at http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx.

Sample Student Responses

Correct Response

12. The art teacher bought buttons for a project.

The teacher bought 1 box, 9 packages, 12 cards, and 5 single buttons.

How many buttons did the teacher buy altogether?

Answer: buttons

2025 1000

In this correct response, the student accurately determines the number of buttons found in one box, nine packages, 12 cards, and five single ones, and correctly computes the total number of buttons the teacher bought.

Partially Correct Response #1

12. The art teacher bought buttons for a project.

The teacher bought 1 box, 9 packages, 12 cards, and 5 single buttons.

How many buttons did the teacher buy altogether?

Answer: _____ buttons

2125 9x 100: 1000 buttons
9x 100: 900 buttons
12x 10: 190 buttons
5x1: 5 buttons
2125 buttons

In this example of a partially correct response, the student shows the number of buttons in nine packages (900), 12 cards (120), and five single buttons. However, the student adds incorrectly when computing the total number of buttons.

Partially Correct Response #2

12. The art teacher bought buttons for a project.

The teacher bought 1 box, 9 packages, 12 cards, and 5 single buttons.

How many buttons did the teacher buy altogether?

Answer: buttons

1,917

1,917

In this partially correct response, the student correctly calculates the number of buttons in one box and nine packages, but incorrectly infers that on 12 cards there are only 12 buttons as opposed to 120 buttons. However, the total is consistent with this incorrect assumption of the number of buttons on a card.

Incorrect Response

12. The art teacher bought buttons for a project.

The teacher bought 1 box, 9 packages, 12 cards, and 5 single buttons.

How many buttons did the teacher buy altogether?

Answer: buttons

27 +

In this incorrect response, the student merely adds each individual number found in the problem and incorrectly concludes that this would yield the desired number of buttons.

Results and Implications

So how did students perform on this question? Only 35 percent of public school students nationwide gave a complete, correct response. Among the Trial Urban District Assessment (TUDA) districts, only four districts exceeded the nationwide percentage (Boston, Charlotte-Mecklenburg, Hillsborough County, and San Diego, with results ranging from 37 to 43 percent correct). (See Table 1 in Appendix B.)

What was missing from students' understanding or instructional experiences that contributed to these results and to the incorrect or only partially correct responses shown above? In these cases, it may be that students were not provided sufficient time on the base-ten number system linked to properties of operations. Instead they may have simply been asked to read, write, add, or subtract numbers (i.e., translating three hundred fifty-five as 355; or 1,024 as one thousand twenty-four) without a deeper understanding of the meaning of what place value signifies.

In addition, the number of students who chose to omit the item ranged from one to five percent (see Appendix B for city-by-city results). These omissions may be attributed to the fact that this was a multi-step *word* problem. It required students to use information from a table and to read and make inferences rather than merely adding the numbers together. This may have been seen as too difficult, particularly for English language learners who may not have understood the vocabulary employed, and some students were clearly not persistent or willing to attempt a problem presented in this manner. It may also be the case that students in some states are only accustomed to seeing assessment items on their annual state tests that are multiple choice and do not require more complicated responses. This problem of omissions, and the lack of perseverance and avoidance of complexity it points to, should be addressed because it will only become more pronounced as students progress through school.

Addressing the Gaps in Learning

So what could a teacher do that would make it more likely that students could solve this type of problem correctly? To get there, both content and instructional concerns must be addressed to eliminate persistent gaps in student learning. In kindergarten through grade three, teachers should focus classroom work on the base-ten number system, including counting and cardinality, as well as the meaning and properties of addition, subtraction, multiplication, and division. This should include a focus on the base-ten system as repeated bundling by ten: ten tens make a unit of a hundred, while repeating this process allows students to create other units (i.e., bundling groups of ten creates other units such as hundreds, thousands, ten thousands, etc.).

Teachers should also connect place value to the properties of operations so students begin visualizing sets of tens, hundreds, or thousands within a given whole number. Classroom work should routinely feature discussions of the relationships between numbers, and teachers should require students to provide detailed explanations about their computations in a way that shows that any multi-digit number can be reduced to a collection of single-digit computations.

Students—particularly English language learners—may also require additional scaffolding and instruction on mathematical vocabulary to ensure that they are equipped with strategies to access and understand precisely what is being asked of them, and have the language skills and grasp of the conventions of written English to effectively communicate their answers.

Moreover, classroom instruction should routinely require that students make sense of quantities and their relationships in problem situations. This would also entail having students explain connections between different representations—verbal descriptions, tables, diagrams, pictures, tools, and equations.

As a result, students will feel more comfortable identifying entry points to a problem's solution, rather than merely skipping the problem. It shouldn't matter which representation is given—students need to be flexible enough to make connections between them and to develop the habit of routinely checking their answers to problems and continually asking themselves, "Does this make sense?"

This need becomes even more pronounced as students transition from one grade level to another and the content becomes increasingly complex. For example, in grade six students will extend their knowledge of the base-ten number system to negative numbers, while in grade seven they will build on their previously acquired knowledge of fractions to recognize that every fraction can be represented by a decimal number that either repeats or terminates. And as students transition to high school, they will learn how the ideas behind the base-ten number system support computations such as combining like units when they calculate with polynomials. Each skill builds on the other, grade-by-grade, to ensure that students develop a deep understanding of mathematical concepts and are ready to apply these skills in college or a career.

Curriculum leaders must therefore ensure that their mathematics curriculum articulates this progression of ideas as students transition from one grade level to the next. This includes providing guidance to teachers in how to support students in developing a deep conceptual and procedural understanding of place value and all other grade-level concepts required by the standards. The curriculum guidance should also indicate to teachers how their current grade-level work builds on prior concepts and will form the foundation for future work. And, wherever necessary, it should supplement textbooks in helping teachers frame the types of questions and assignments that will require students to explore concepts and explain and justify their solutions to problems. Professional support should also demonstrate techniques for folding in remediation for students who need it while simultaneously working on grade-level concepts.

Eighth Grade

In the sample grade-eight NAEP mathematics item below, students are asked to apply their understanding of prime and composite numbers to solve a multi-step problem requiring them to make generalizations about the sum of any two primes. Students are expected to make plausible arguments, justify their conclusions, and communicate their mathematical reasoning to others (MP.3). In this way, the problem reflects a mixture of the mathematical reasoning and content emphasized in the common core mathematics standards.⁴

Beginning in grade four, the common core standards call for students to gain familiarity with factors and multiples and to learn to identify, define, and list prime and composite numbers between one and 100 (4.0A). This work in grade four is critical to subsequent work in grade six, where students use their skills in recognizing common factors (6.NS) to rewrite expressions (6.EE). This includes recording operations with numbers and letters standing for numbers to make generalizations about their structure.

[&]quot;This item also reflects the complexity and structure of PARCC and SBAC items for mathematics. For example, PARCC and SBAC sample items will involve multistep problems that require students to provide an explanation for their thinking and illustrate the direct application of their answers. One sample PARCC item, for instance, requires students to calculate a total number of tiles, organize the tiles on a wall in a particular pattern, and finally illustrate an equation that might be used to solve the problem in three distinct steps. For further analysis of the similarities between NAEP and PARCC/SBAC items see http://www.cgcs.org/domain/165. Sample PARCC and SBAC items for mathematics can be found at http://sampleitems.smarterbalanced.org/itempreview/sbac/index.htm and http://epat-parcc.testnay.com/client/index.html#login?username=guest4&password=guest4.

2013 NAEF RELEASED MATHEMATICS ITEM, Grade Eight	
16. (a) If c and d are different prime numbers less than 10 and the sum $c+d$ is a composite number greater than 10, what is one possible pair of values for c and d ?	ì
c =	
d =	
(b) If j and k are different <u>prime</u> numbers less than 10 and the sum $j + k$ is a prime number less than 10, what is one possible pair of values for j and k ?	
j =	
k =	
(c) If s and t are different prime numbers greater than 10, explain why the su $s+t$ cannot be a prime number.	ım

***United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

In this question, students are asked to move beyond merely identifying or listing prime and composite numbers. Instead, they are expected to apply their understanding to make generalizations. While parts (a) and (b) of the problem involve pairs of prime numbers less than ten whose sum is either less than or greater than ten, part (c) requires students to explain why the sum of two prime numbers greater than the number two is always a composite.

Here, students must discern characteristics of the numbers in a way that will allow them to generalize about their structure when adding two primes. They must also know that two is the only even prime number. The following are sample student responses to this NAEP item.⁵

⁵Available at http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx.

Sample Student Responses

Acceptable Response

c =		d =			
	5		7		
				10 and the sum $j + k$ air of values for j and	
j = _		k =			
	7		3		

They cannot be prime because all primes greater than 10 are odd numbers, and when adds are added together, an even is the result, which must have 2 as a factor

In this example of an acceptable extended response, the student cites the two primes less than ten and provides a detailed explanation relating the sum of the two prime numbers to odd numbers and concluding that the sum of two primes, thereby, results in more than two factors. The student explains this by indicating that two would be a factor of the sum of the two prime numbers.

Satisfactory Response

16. (a) If c and d are different prime numbers less than 10 and the sum c + d is a composite number greater than 10, what is one possible pair of values for c and d?

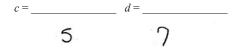
(b) If j and k are different <u>prime</u> numbers less than 10 and the sum j + k is a prime number less than 10, what is one possible pair of values for j and k?

(c) If s and t are different prime numbers greater than 10, explain why the sum s + t cannot be a prime number.

In this satisfactory response, the student correctly answered parts (a) and (b) but did not clearly explain that all primes greater than ten are odd, or why the sum is a number with more than two factors.

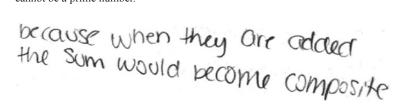
Partial Response

16. (a) If c and d are different prime numbers less than 10 and the sum c + d is a composite number greater than 10, what is one possible pair of values for c and d?



(b) If j and k are different <u>prime</u> numbers less than 10 and the sum j + k is a prime number less than 10, what is one possible pair of values for j and k?

(c) If s and t are different prime numbers greater than 10, explain why the sum s+t cannot be a prime number.



In this partial response, the student correctly answered parts (a) and (b) – merely identifying two prime numbers less than 10. However, the student did not provide a detailed explanation about why the sum would be composite.

This type of response is not uncommon. In several of the student responses to this NAEP item, parts (a) and (b) of the problem were answered correctly, but students did not provide clear and detailed explanations or elaborations to show that they understood clear features about the structure of primes greater than 10. In this case, the student indicates that the sum of the two primes is a composite, but does not provide details about "why," or relate to the actual structure of the sum of the two primes.

Incorrect Response

16. (a) If c and d are different prime numbers less than 10 and the sum c + d is a composite number greater than 10, what is one possible pair of values for c and d?

(b) If j and k are different <u>prime</u> numbers less than 10 and the sum j + k is a prime number less than 10, what is one possible pair of values for j and k?

(c) If s and t are different prime numbers greater than 10, explain why the sum s + t cannot be a prime number.

It can not be a prime number because the Sum is greater then 10.

In this incorrect response, the student did not choose two different prime numbers and their sum was not greater than 10 as required in part (a), and the student wrote two composite numbers in part (b). There is some indication that the student is unclear about the differences between a prime and composite number, or may not know what a prime number is. In part (c), the student incorrectly infers that there are no prime numbers greater than 10.

Results and Implications

So how did students perform on this question? Only 18 percent of public school students nationwide gave at least a partially correct response, and only two percent gave a complete, correct (i.e., "extended") response. In most student responses, prime numbers were identified but students had difficulty applying their understanding to provide a clear and detailed explanation about the sum of two primes and to make both connections and generalizations. A problem like this becomes even more challenging when students are asked to clearly justify and defend both their assumptions and conclusions.

Additionally, there was a large number of students who chose to skip or omit the item altogether (nine percent of public school students nationally)—and an even higher percentage of Black and Hispanic students who chose to omit the item (13 percent). Among the Trial Urban District Assessment (TUDA) districts, the number of students who chose to omit the item ranged from six to 23 percent. (See Table 2 in Appendix B.)

The large number of omissions may be attributed to the fact that this item was a word problem. Some students may have seen it as quite "wordy," or as using unfamiliar mathematical terminology. They may also have been intimidated by the number of parts to the problem. In states where annual or benchmark assessments present questions that are primarily multiple choice, students may not have enough practice tackling these types of short-answer or extended response problems.

Even if students learned about prime and composite numbers at an earlier grade level, they may have skipped the entire problem rather than attempting even part (a), where they could have easily identified two different primes less than ten whose sum was greater than ten. This suggests that students lack persistence and have not developed the habit of at least attempting to answer complex, multi-step problems.

Addressing the Gaps in Learning

So, what could a teacher do that would make it more likely that students will be able to solve this type of problem correctly? Teachers should routinely require students to use their prior learning and apply it in new and different contexts. This includes having students look at relationships between numbers to determine patterns or the structure of an operation.

Teachers should also have students take a broader, more strategic look at a problem in order to describe and generalize patterns. Omission rates tend to increase in the upper grades, so it is important that administrators and teachers present problems to students in regular classroom instruction that are multi-step, involve close reading, and require students to explain their answers or to justify generalizations to show that they understand the mathematical concepts and to give them practice persisting with more complex problems.

Moreover, deliberate attention should be paid to unpacking the language demands in mathematical word problems—particularly for students acquiring English—and to reinforcing students' understanding of discipline-specific academic vocabulary and linguistic structure. As noted earlier, students should understand what is being asked of them, and should feel confident in their ability to demonstrate their understanding of mathematical concepts in writing.

Students should also be adept at integrating information provided in a question and explaining the connections between expressions, tables, diagrams/pictures, and equations. This will allow them to look for entry points to solving an unfamiliar problem, rather than merely *omitting* the problem. This depth of knowledge and skills will enable students to confidently handle future demands in college or careers.

District curriculum leaders should be asking themselves the following kinds of questions-

- ✓ Where in our curriculum documents can teachers find guidance on using/creating student tasks, assignments, or assessments that allow time for students to explore concepts in depth, consider the structure of numbers and their relationships, and lead progressively from one grade level to another?
- ✓ Are we providing teachers with guidance and feedback about instruction that emphasizes how mathematics instruction should deepen a student's prior knowledge and help students make explicit connections among multiple concepts?
- ✓ How are teachers connecting grade-level concepts explicitly to prior knowledge from earlier grades?
- ✓ What guidance and resources are available for teachers to work with students who have gaps in their learning?
- ✓ What guidance are we providing on building academic vocabulary and language so that students can read and discuss mathematics problems? Are students routinely expected to use words, phrases, and sentences to apply the technical vocabulary in mathematics?
- ✓ Are students routinely being asked to explain and justify their thinking using the language of mathematics?
- How are we using evidence from student work to know that students are gaining confidence and expertise in explaining how they derived an answer or explaining generalizations about mathematical concepts?
- ✓ How well do teachers balance the need to provide students with support and scaffolding with the need to allow students to struggle productively at appropriate times? How often are students expected to work through difficult problems themselves, rather than having the teacher walk them through each new problem "step by step"?
- How are we using samples of student work to refine our supports for schools?

English Language Arts and Literacy: Progress toward Standards and Implications for Curriculum and Instruction

Traditionally, the most common approach to English language arts and literacy instruction has been to focus on teaching one skill or objective at a time. However, the common core requires educators to teach and assess a student's ability to apply multiple reading, writing, and analytic skills simultaneously.

Moreover, students in the past were often asked to describe how they related to or felt about a particular reading passage without having to demonstrate a deeper comprehension of what they read or the ability to cite information or details from the text. Students must now carefully read a text and effectively communicate their answers both verbally and in writing, supporting those answers with evidence from the text.

Fourth Grade

In the 2013 NAEP English language arts assessment item below, fourth-grade students are asked to read an article about sharks and describe a strength and weakness in the author's presentation of the information, citing evidence from the text. As described above, this is similar to the expectations the common core standards in English language arts and literacy set for students.⁶

For example, the common core requires fourth graders to determine how well an author has presented information in a text or part of a text (R.I.4.5). That means interpreting information presented visually, or ally, or quantitatively and explaining how the information contributes to one's understanding of the text in which it appears (R.I.4.7).

[&]quot;This is also consistent with the types of questions students will find on the PARCC and SBAC assessments, which will ask them to explain their answers and provide short or extended responses to individual items. The fourth grade NAEP item described here, for example, mirrors an SBAC item that asks students, "How does the author emphasize the point that the TAM program was a positive influence on the sisters' lives? Use details from the text to support your answer." For further analysis of the similarities between NAEP and PARCC/SBAC items see http://www.cgcs.org/domain/165. Sample PARCC and SBAC items for English language arts can be found at www.parcconline.org and www.parcconl

2013 NAEP RELEASED ENGLISH LANGUAGE ARTS ITEM, Grade Four (Text provided in Appendix A.)

Describe a strength and a weakness in the way the author presents the information in the article. Support your answer with examples from the article.

There are several intellectual operations in play here. First, students must be able to read the article and develop an understanding of the topic based on the information provided. Then students must cite the parts of the article that best contributed to their understanding, as well as the parts that were not so effective in enhancing their knowledge.

Moreover, students are *not* asked to select correct answers from a list of choices—they must generate their own answers. The following are sample student responses to this NAEP item.⁷

^{**}United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

⁷Available at http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx.

Sample Student Responses

Acceptable Response

A strength the author presents in the story is that the author puts pictures in the story that helped explain what it look like and what it does. A weakness that the author expresses is that she could have explained a little more on what happened during the sharks story at the aquarium.

In the acceptable response, even though the wording is awkward, the student uses evidence from the article to support his or her answer, citing the author's use of pictures as a strong point that enhanced his/her understanding of sharks. This student also points out a specific weakness—a paragraph that needed more elaboration on what sharks do in an aquarium. In this case, the student was able to use his/her knowledge of how specific features of a text contribute to a clear understanding of the topic presented.

Unsatisfactory Response

one Strength the author did was making the article very interesting and making the reader want to been reading. There wasn't really a weakness.

In this unsatisfactory response, the student uses a "text-to-self" approach, answering the question by offering an unsupported personal opinion that implies he or she had a limited exposure to assignments and tasks that required the student to analyze and cite evidence from a text.

Results and Implications

So how did students do on this question? Only 14 percent of public school students nationwide gave a "correct" response (i.e., an "essential" or "extensive" response), and only four percent gave a complete, correct (i.e., "extensive") response. Of the 21 districts participating in the Trial Urban District Assessment (TUDA), none had more than eight percent of their students writing complete, correct answers. In public schools nationwide and TUDA districts, the percentage of unsatisfactory responses on this item ranged from 20 percent to 40 percent. (See Table 3 in Appendix B.)

Interestingly, a high number of students—50 percent nationwide—received partial credit for their answers. Many students also chose to skip or omit the item altogether (10 percent in public schools nationwide, and between six and 12 percent in TUDA districts). These high rates of partial credit and omissions indicate that students were not adequately prepared to respond to questions that require them to write out and justify their thinking. This may have been because they lacked experience carefully reading and evaluating text, or because they were more accustomed to multiple-choice, true or false, or fill-in-the-blank questions.

Addressing the Gaps in Learning

What could a teacher be doing that would make it more likely that students are able to provide complete written responses to questions like this? Throughout the year, teachers should provide systematic reading instruction that enables students to read and comprehend grade-level literary and informational texts independently and accurately. Additionally, teachers should provide students with regular opportunities to interpret informational texts and explain—both verbally and in writing—how the presentation of the information (including charts, illustrations, diagrams, etc.) contributed to or inhibited their understanding of the topic. Again, students should be given ample opportunity to gain experience in supporting their conclusions and interpretations with evidence from the text itself.

Additionally, it is important for teachers to model close-reading strategies for students and explicitly teach them how to track their growing understanding of the concepts they are learning as they proceed through the reading material. This is particularly critical as the texts become more complex and abstract.⁸

Eighth Grade

In the sample 2013 grade-eight NAEP assessment item below, students are asked to evaluate the persuasiveness of the writing device an author uses at the end of a text in relationship to the rest of the essay, using details and analysis of the text as a whole to support their answer. Again, this reflects the intellectual requirements of the common core English language arts standards, which require students to analyze the structure of a specific paragraph in a text, including the role of particular sentences and their structures, in developing and refining a key concept (R.I.8.5), and to evaluate the advantages and disadvantages of using different mediums to present a particular topic or idea (R.I.8.7).

2013 NAEP RELEASED ENGLISH LANGUAGE ARTS ITEM, Grade Eight (Text provided in Appendix A.)

The author ends the essay with a childhood story. Does the childhood story do a better job persuading readers of the author's point than the other parts of the essay? Explain why or why not.

**United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

The following are sample student responses to this NAEP item. 10

⁸For additional resources for teachers, see the Basal Alignment Project web page at http://www.commoncoreworks.org/domain/112.

This also reflects the types of English language arts items students will encounter on the PARCC and SBAC assessments. For example, one PARCC sample item uses a website, an article, and a video to describe Amelia Earhart. Students are asked to analyze the strength of the author's arguments across mediums and write an essay using textual evidence to support their ideas. For further analysis of the similarities between NAEP and PARCC/SBAC items see http://www.cgcs.org/domain/165. Sample PARCC and SBAC items for English language arts can be found at www.parcconline.org and www.smarterbalanced.org.

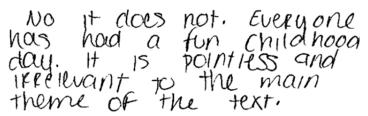
¹⁰Available at http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx.

Sample Student Responses

Extensive Response

Ves, It does a bother job persuading reader of the author's point because it was so simple, but fun. It shows that you can't go hunting for fun, but it will come to you in an unexpected way. Also, this part is good at persuading people because they can relate to it. Almost everyone has a similar childhood memory.

As in the case of the earlier sample test item, the difference between the extensive and the unsatisfactory responses is the orientation of the reader's relationship with the text. The student who wrote an extensive response is clearly comfortable supporting claims with evidence from the text.



This unsatisfactory response, meanwhile, dismisses the author's childhood story because "everyone has had a fun childhood day," demonstrating that the student either lacked an understanding of what the author's point was (because he or she did not receive instruction on how to identify the main theme of a text), or the student did not read the entire passage, skimming only the section referenced in the question. In either case, the student defaults to using his or her own experiences to answer the question.

Moreover, the student's use of the words "pointless" and "irrelevant" suggests that he or she understands the concept of evaluating the effectiveness of claims, but needs more practice using evidence from the text to support this assessment.

Results and Implications

So how did students do on this question? Less than a third of public school students nationwide gave a "correct" response (i.e., an "essential" or "extensive" response), and only eight percent gave a complete, correct ("extensive") response. Of the 21 TUDA school districts, none of them had more than 11 percent of their students writing correct, complete answers. (See Table 4 in Appendix B.)

As we saw in the grade four sample item, a relatively large number—24 percent—of public school students nationwide earned partial credit for their answers. This indicates that many students may have understood the concept of using persuasive devices, but fell short in their ability to use evidence within the text to evaluate the effectiveness of these devices. Incorrect or incomplete answers, as well as high omission rates, also indicate that students may not feel comfortable writing a short response or are not accustomed to doing so.

Addressing the Gaps in Learning

What could a teacher be doing that would make it more likely that students are able to provide complete written responses to questions like this? Teachers should routinely require students to cite evidence from the text to support their written answers to text-dependent questions. In this case, students may also need more explicit instruction throughout the year that requires them to analyze how authors use various combinations of persuasive devices and word choices to support their positions and arguments.

Teachers should also be providing students with more frequent opportunities to explain how an author's use of one persuasive device may or may not be more effective than another device used in a particular essay. Again, the explanation must be grounded in evidence from the text, and the student needs to know when their answer has sufficiently addressed the question.

Of equal importance in teaching students to accurately respond to complex questions is the role of teacher questioning during classroom instruction and discussion. An effective set of complex, text-dependent questions delves systematically into a text in order to guide students in extracting key ideas and concepts presented in literary and informational texts across content areas. If teachers provide students regular opportunities to answer questions that are specific and multi-layered, students will gain greater confidence in tackling more difficult questions as the year progresses and they gain greater proficiency.¹¹

This is also a place where administrators and central office staff should revisit the curriculum or scope and sequence documents to make sure that teachers are provided with the proper guidance about the depth of instruction that is needed across all content areas.

¹¹ For additional resources for teachers, see the Basal Alignment Project web page at http://www.commoncoreworks.org/domain/112.

District curriculum leaders should be asking themselves the following kinds of questions-

- ✓ Where in our curriculum documents can teachers find guidance on how to use close reading strategies to teach challenging and complex text and to pose text-dependent questions that explore the content, structure, vocabulary, and language of the text?
- Are we providing teachers with guidance on how to identify measures of text complexity and to differentiate among and select texts for quality and richness?
- ✓ Are teachers regularly providing all students, including those who read below grade level, with opportunities to read and comprehend complex, grade-level appropriate text?
- Are teachers using a wide range of rich and diverse texts that take into account individual student needs and interests in order to foster independent reading?
- ✓ In secondary schools, how are teachers of other content areas being prepared to ensure that all students are accessing grade-level texts in all subjects?
- ✓ How is the district helping teachers identify texts that will provide students with sufficient reading on a given topic to enable them to work both independently and in classrooms to ensure strong academic vocabulary and language?
- ✓ How are we making our teachers aware of free materials that model the use of text-dependent questions? (See www.commoncoreworks.org for access to the Read-Aloud, Basal Alignment, and Anthology Alignment Projects.)
- ✓ How often are students provided explicit instruction on producing effective, logically-organized written answers and effectively supporting a position in writing? What guidance do we provide to teachers on ensuring adequate attention to writing?
- How do we use student work to determine additional support needed by teachers and schools?
- How have we provided look-fors for principal supervisors and principals to ascertain how well students are progressing

Conclusion

Our analysis of selected 2013 NAEP items that are similar in rigor and focus to the common core standards—and the types of items likely to be seen on the new common core assessments—indicates that students are not being academically prepared for college and careers, and that school districts urgently need to pick up the pace of their common core standards implementation.

This will not be accomplished with "test prep," and common core checklists and worksheets won't even skim the surface of the fundamental changes that need to be happening in all classrooms. Meeting these new educational standards will mean a comprehensive examination of the curriculum, materials, instructional guidance, and professional development available to administrators and teachers to institute the level of rigor and instructional shifts called for by the common core.

As central office instructional leaders and specialists, you may have great confidence in the quality and potential utility of current curricular materials and guidance. But if these materials end up sitting on a shelf, or if they aren't viewed by the intended users as immediately useful and applicable in changing classroom instruction, they will do nothing to further instructional quality or student learning.

District and school staff report that, even now, they receive professional development focused on providing an overview of what the standards are, rather than on how to implement them in their classrooms and schools. Understanding the need for the standards is important, but the time for providing only preliminary overviews of the common core has passed.

If the preceding analysis of student performance on selected NAEP items shows us anything, it is that teachers and principals require additional support and more concrete guidance. This includes clear and differentiated "next steps" based on where a school or teacher is in the implementation process. It also includes strategies for adjusting instruction and supporting struggling students, as well as supplemental materials and tools that teachers can use to bridge the divide between the common core standards and textbooks and curricula that do not yet meet these standards.

Moving forward, district instructional staff and leaders should consider the following steps:

- Ensure that the leadership of the district is committed to achieving full implementation of the standards and that their commitment is visible and clearly communicated throughout the district.
- Use cross-functional teams in establishing implementation as a leading priority of the district.
- Build a sense of joint ownership of common core implementation among central office staff. Departments that act as silos will only end up sending disjointed, mixed messages to schools and staff.
- Conduct field research and consult with school leaders and teachers to determine what curricular materials are actually being used, and why or why not.
- Identify where any breakdowns in communication are happening and develop mechanisms for systematically sharing resources with schools, gathering feedback, addressing concerns, and improving tools on an ongoing basis.
- In collaboration with a committee of school and central office staff, develop a clear description of stages of common core implementation. Consider what high quality instruction should look like at each grade level and how student work should indicate the level of implementation at various times of the school year. Use that blueprint and observations of student work to assist schools in moving from one stage to the next to reach comprehensive implementation.
- Enlist regional offices, zones, or other management structures to ensure that the district's strategic priorities and common core implementation plans inform the work of schools. Verify that principal supervisors have the information and skills they need to assist principals in attaining full implementation in schools.

- Shift the focus of teacher and administrator professional development on the common core from the "what" to the "how," providing concrete steps and strategies for teachers to use to adjust their classroom instruction to reflect the focus and rigor of the common core standards while addressing the needs of all students.
- Review the district's curriculum guidance, instructional materials, texts, and programs to ensure that they are aligned to the common core and determine where they are not. In selecting materials, the district should consult the Publishers' Criteria and other tools like the IMET from Student Achievement Partners, EQuIP from Achieve, and the grade-bygrade and ELL-specific rubrics developed by the Council of the Great City Schools.
- Conduct a thorough analysis of the district's professional development program, as well as school use of common planning time and professional learning communities, to ensure that schools and teachers are supported in a way that allows them to provide instruction that results in students meeting the challenges outlined in this booklet. In addition, professional development should be defined and delivered in a way that encourages more reading and discussion across content areas.
- Develop explicit look-fors for observing classroom practice and protocols for teachers to collaboratively review student work samples based on the district's scope and sequence documents and the common core. Provide resources and professional development on these look-fors and protocols. This should not amount to checklists or personnel evaluations, but should reflect the overall spirit and intent of the standards-which is to ensure that students graduate from high school with the essential knowledge and skills they need to be successful in college and careers.

 Develop instructional materials and supports, professional development, and protocols for classroom observation that purposefully and explicitly attend to the specific needs of ELLs, students with disabilities, struggling students, and other groups with special needs.

Finally, while this document used specific examples related to place value, prime numbers, and author's point of view and use of informational and persuasive devices, the overall recommendations here apply to all college and career-ready content. It is important in the implementation of the new standards that-

- Teachers demonstrate an understanding of how specific mathematics and literacy content evolves across grade levels. Teachers and students should be aware of the connections between current concepts and concepts and skills learned in earlier grades. Curriculum guidance should indicate to teachers how their current grade-level work builds on prior learning and will form the foundation for future work.
- Students have consistent (at least weekly) experience with short and extended-response items in mathematics-and more frequently in reading-so that it becomes routine practice for students to explain and justify their conclusions. Students will face a number of items on the new assessments that are not multiple choice, and they will need to feel comfortable writing detailed responses and determining when their answers are complete.
- Students develop an understanding of the deeper meaning and connections between concepts in mathematics, while still getting practice with the basic underlying math skills emphasized in the standards.
- Students learn how to use close reading strategies to access gradelevel texts across content areas. Teachers should build students' academic vocabulary and ability to handle the complex language structures they will encounter in their reading.

- In all content areas, students are consistently required to use information from the texts they read to articulate their understanding verbally and in writing.
- Students are presented with math problems or situations that require them to determine which information is necessary to solve multi-step problems.
- Students become comfortable interpreting information that is presented visually, orally, or quantitatively (such as in tables, diagrams, pictures, illustrations, equations, charts, and graphs) and explaining how the information contributes to their understanding of the text. Students must have experience providing detailed explanations—both verbally and in writing—of how specific parts of a text and the presentation of information contribute to or hinder their understanding.
- Students consistently encounter and solve complex, multi-step mathematics problems and respond to questions about rich, nuanced reading passages. This will help students develop patience and perseverance. It will also give them confidence when faced with items that require more than the selection of a single response from four or five multiple-choice options Students should be comfortable enough with academic vocabulary to make generalizations about their understanding, and to justify and defend their assumptions and conclusions.

In conclusion, insofar as NAEP can provide us with a context for charting student performance and preparedness, it is clear that students in urban schools and nationwide are not yet equipped to successfully meet the standards being implemented in their classrooms and the new assessments they will soon take. The results of this analysis should serve as a wake-up call. Our standards of instruction need to quickly catch up to the new academic expectations we have set for students. The ability of our children to thrive and succeed as they prepare for college and careers in a world that will expect much more of them will depend on our collective response—as teachers, principals, curriculum leaders, superintendents, school board members, and parents—to the evidence before us.

Appendix A: Sample NAEP Reading Passages

Grade Four NAEP Reading Passage

Little Great White

by Pamela S. Turner

Moms, dads, and kids crowded around the window at Monterey Bay Aquarium. When a small grayand-white shark swam by, a woman squealed, "There she is!"

Eight-year-old Sammy gazed up at the shark. He saw the rows of perfectly white, perfectly sharp teeth. "She's really pretty," said Sammy, "but a little scary, too."

The shark was a baby "great white shark." (Scientists call them white sharks.) They have a terrifying reputation: Sometimes the sharks attack swimmers, probably because the shark mistakes the swimmer for a seal or sea lion.

Attacks on humans are rare. But



many movies make people think that these sharks are monsters waiting to eat them.

The baby white shark at Monterey Bay Aquarium wasn't much of a monster. At 4 feet 4 inches long and 62 pounds, she was about the same size as a nine-year-old girl. But when full-grown, she could reach 19 feet in length and weigh more than 2 tons—longer and heavier than a minivan.

"We are really quite proud of her," said John O'Sullivan of the Monterey Bay Aquarium. "She is a beautiful, fascinating, majestic swimmer."

Can We Keep Her?

Bringing a white shark to the

Page 1 of 7



A veterinarian gives the shark a checkup before her trip to the aquarium.

aquarium wasn't easy. For fifty years aquariums have tried to keep white sharks alive, but the sharks would not eat in captivity.

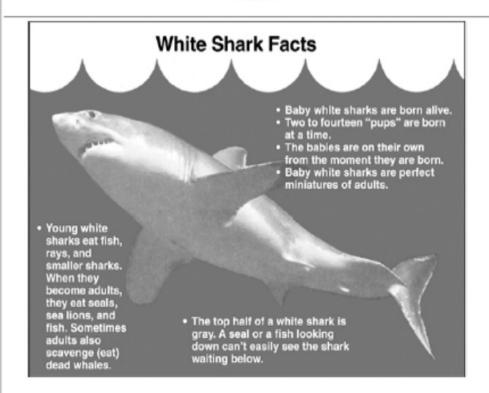
The baby shark had been caught accidentally by a halibut fisherman off the coast of Southern California. Mr. O'Sullivan and his team knew that white sharks were sometimes caught this way. The aquarium had a special floating pen waiting in coastal waters nearby. While the shark lived in the pen, she was fed the same things she would have eaten in the wild—smaller sharks and other fish. The floating pen helped her get used to living in a small space.

After living in the pen for 26 days, the shark was put into a special 3,000-gallon tank and driven north to the aquarium. She was given a quick health check and slipped into the million-gallon Outer Bay Exhibit tank. The next

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morning, the shark ate

Page 2



salmon for breakfast. The aquarium staff cheered!

The baby shark was fed using a long pole with a loop at the end to hold pieces of fish. "You slap the food in front of her, get her excited, and she attacks it," explained Mr. O'Sullivan. "When you watch her feed, it is very, very exciting." At one point, she bit the feeding stick and snapped off a piece of it.

A Healthy Appetite

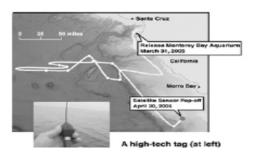
The aquarium staff worried that the white shark might attack her tankmates, such as tuna, sea turtles, stingrays, and soupfin sharks. "We try to make sure everybody in the tank is happy and has a full tummy," said Mr. O'Sullivan. "A few of the little barracuda nip at her tail. It is sort of like a dog chasing a car. It is probably not a smart thing to do!"

The aquarium staff didn't know how long they could keep the baby white shark. They planned to set her free if she stopped eating. Even if they could keep her a long time, they planned to set her free when she got bigger.

In just six and a half months, the shark grew two feet in length and more than doubled in weight. Scientists were surprised at how quickly she grew.

As the white shark got bigger, she began hunting her tankmates. She bit and killed two soupfin sharks. The aquarium released her into the ocean on March 31, 2005.

Page 3



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A Message Home

Before letting her go, scientists attached a special "pop-up" satellite tag to the white shark. A month later the tag automatically popped off the shark, floated to the surface, and sent data to an orbiting satellite.

The tag told scientists that the shark was alive and had swum 200 miles south since her release. This is as close as any shark gets to sending a postcard: "The water is fine. Wish you were here!"

During her stay, the baby shark gave people a more balanced view of white sharks. People fear many animals, such as lions and grizzly bears. But over time, people have accepted the idea that these animals have a right to exist. We set up national parks to protect them.

Many scientists think that white sharks are very rare and should also be protected. It is now against the law to fish for white sharks off the shores of places like the United States, Australia, and South Africa.

"Having a live, swimming white shark lets people say, 'Wow, this animal is really neat,'" says Mr. O'Sullivan. He hopes that people will begin to understand this magnificent creature. Then they will help protect it.

> Copyright © 2006 by Highlights for Children, Inc., Columbus, Ohio. Photos: © Monterey Bay Foundation.

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Grade Eight NAEP Reading Passage

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FUN

by Suzanne Britt Jordan

Fun is hard to have.

Fun is a rare jewel.

Somewhere along the line people got the modern idea that fun was there for the asking, that people deserved fun, that if we didn't have a little fun every day we would turn into (sakes alive!) puritans.

"Was it fun?" became the question that overshadowed all other questions: good questions like: Was it moral? Was it kind? Was it honest? Was it beneficial? Was it generous? Was it necessary? And (my favorite) was it selfless?

When the pleasure got to be the main thing, the fun fetish was sure to follow. Everything was supposed to be fun. If it wasn't fun, then we were going to make it fun, or else.

Think of all the things that got the reputation of being fun. Family outings were supposed to be fun. Education was supposed to be fun. Work was supposed to be fun. Walt Disney was supposed to be fun. Church was supposed to be fun.

Page 1 of 4

Staying fit was supposed to be fun.

Just to make sure that everybody knew how much fun we were having, we put happy faces on flunking test papers, dirty bumpers, sticky refrigerator doors, bathroom mirrors.

If a kid, looking at his very happy parents traipsing through that very happy Disney World, said, "This ain't fun, ma," his ma's heart sank. She wondered where she had gone wrong. Everybody told her what fun family outings to Disney World would be. Golly gee, what was the matter?

Fun got to be such a big thing that everybody started to look for more and more thrilling ways to supply it. One way was to step up the level of danger so that you could be sure that, no matter what, you would manage to have a little fun.

Television commercials brought a lot of fun and fun-loving folks into the picture. Everything that people in those commercials did looked like fun: taking Polaroid snapshots, buying insurance, mopping the floor, bowling, taking aspirin. The more commercials people watched, the more they wondered when the fun would start in their own lives. It was pretty depressing.

Page 3

Big occasions were supposed to be fun. Christmas, Thanksgiving and Easter were obviously supposed to be fun. Your wedding day was supposed to be fun. Your honeymoon was supposed to be the epitome of fundom. And so we ended up going through every Big Event we ever celebrated, waiting for the fun to start

It occurred to me, while I was sitting around waiting for the fun to start, that

Page 2 of 4

not much is, and that I should tell you just in case you're worried about your fun capacity.

I don't mean to put a damper on things. I just mean we ought to treat fun reverently. It is a mystery. It cannot be caught like a virus. It cannot be trapped like an animal. The god of mirth is paying us back for all those years of thinking fun was everywhere by refusing to come to our party. I don't want to blaspheme fun anymore. When fun comes in on little dancing feet, you probably won't be expecting it. In fact, I bet it comes when you're doing your duty, your job, or your work. It may even come on a Tuesday.

I remember one day, long ago, on which I had an especially good time. Pam Davis and I walked to the College Village drug store one Saturday morning to buy some candy. We were about 12 years old. She got her Bit-O-Honey. I got my malted milk balls, chocolate stars, Chunkys, and a small bag of M & M's. We started back to her house. I was going to spend the night. We had the whole day to look forward to. We had plenty of candy. It was a long way to Pam's house but every time we got weary Pam would put her hand over her eyes, scan the horizon like a sailor and say, "Oughta reach home by nightfall," at which point the two of us would laugh until we thought we couldn't stand it another minute. Then after we got calm, she'd say it again. You should have been there. It was the kind of day and friendship and occasion that made me deeply regretful that I had to grow up.

It was fun

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Appendix B: City-by-City NAEP Item Results

Table 1.
Percentage of Students in Various Response Categories for a 2013
Grade Four Constructed Response NAEP Released Mathematics Item

	Incorrect	Partial	Partial	Correct	Omitted
	Response*	Response 2*	Response 1*	Response*	
National Public	57	4	2	35	2
Albuquerque	66	1	1	28	4
Atlanta	70	2	1	25	3
Austin	59	3	1	35	1
Baltimore City	75	3	1	16	5
Boston	53	1	1	41	3
Charlotte	47	5	2	43	3
Chicago	67	3	2	25	4
Cleveland	80	2	1	13	3
Dallas	63	4	2	29	3
Detroit	83	1	#	11	4
District of	71	3	1	3	2
Columbia (DCPS)					
Fresno	79	2	1	13	5
Hillsborough	51	4	2	40	3
County					
Houston	73	3	1	21	2
Jefferson County	60	5	2	29	4
(KY)					
Los Angeles	67	4	1	24	4
Miami-Dade	62	1	3	32	2
Milwaukee	74	2	1	21	2
New York City	58	6	2	32	2
Philadelphia	75	2	1	18	3
San Diego	59	3	#	37	2

United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

^{*}For a detailed explanation of the differences between performance levels, see http://nces.ed.gov/nationsreportcard/itmr/sx/search.aspx?subject=mathematics

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Table 2.

Percentage of Students in Various Response Categories for a 2013
Grade Eight Extended Constructed Response NAEP Released
Mathematics Item

	Incorrect Response*	Minimal Response*	Partial Response*	Satisfactory Response*	Extended Response	Omitted	Off Task
National	52	20	12	4	2	9	1
Public							
Albuquerque	47	19	13	4	2	14	#
Atlanta	56	19	10	2	1	11	#
Austin	52	16	10	5	2	14	2
Baltimore City	63	16	5	1	#	15	#
Boston	37	20	13	6	3	18	2
Charlotte	47	20	11	6	4	11	1
Chicago	60	14	7	3	1	15	1
Cleveland	64	14	4	1	#	17	#
Dallas	53	18	4	1	#	23	#
Detroit	65	12	5	#	#	16	1
District of	66	12	6	2	#	15	#
Columbia							
(DCPS)							
Fresno	57	20	6	1	2	11	2
Hillsborough	60	16	9	2	3	6	3
County							
Houston	60	13	8	1	2	16	#
Jefferson	61	16	9	4	2	7	1
County (KY)							
Los Angeles	47	16	14	2	2	19	1
Miami-Dade	62	15	8	1	1	12	1
Milwaukee	65	16	2	1	#	15	#
New York City	47	18	11	3	3	18	#

United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

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^{*}For a detailed explanation of the differences between performance levels, see http://nces.ed.gov/nationsreportcard/itmrlsx/search.aspx?subject=mathematics

Table 3.

Percentage of Students in Various Response Categories for a 2013
Grade Four Short Constructed Response NAEP Released Reading Item

	Unsatisfactory Response*	Partial Response*	Essential Response*	Extensive Response*	Omitted	Off Task
National Public	25	50	10	4	10	1
Albuquerque	33	48	9	2	8	1
Atlanta	29	51	10	3	7	#
Austin	28	47	10	4	9	3
Baltimore City	32	46	5	5	12	1
Boston	29	48	7	4	10	1
Charlotte	26	47	12	6	8	1
Chicago	27	50	8	5	8	2
Cleveland	35	46	4	1	12	2
Dallas	38	39	10	2	11	#
Detroit	40	41	6	1	11	1
District of Columbia (DCPS)	32	44	11	4	8	1
Fresno	38	41	6	1	12	1
Hillsborough County	22	43	14	8	12	1
Houston	34	51	5	2	8	#
Jefferson County	20	56	12	5	6	#
Los Angeles	35	45	8	2	10	1
Miami-Dade	22	54	9	5	11	#
Milwaukee	33	51	7	#	8	1
New York City	20	55	11	5	8	1
Philadelphia	34	48	4	2	9	2
San Diego	24	48	12	6	9	1

United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

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^{*}For a detailed explanation of the differences between performance levels, see http://nces.ed.gov/nationsreportcard/itmrlsx/search.aspx?subject=reading

Table 4.

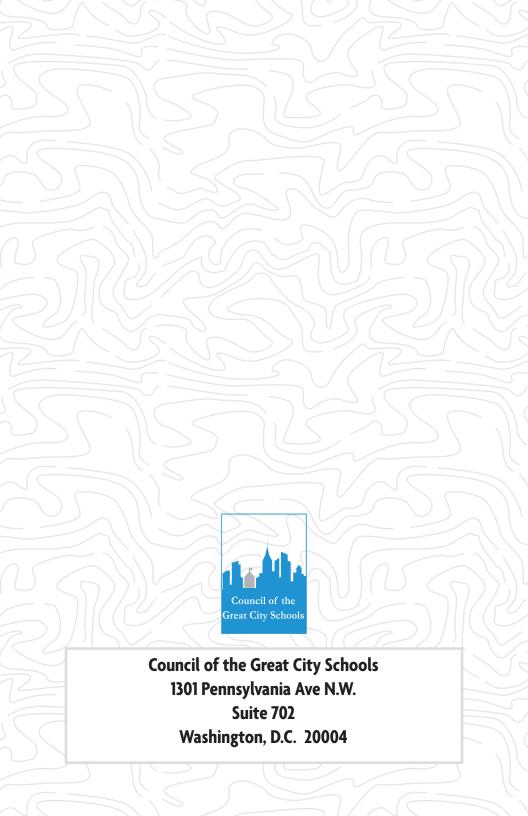
Percentage of Students in Various Response Categories for a 2013 Grade
Eight Extended Constructed Response NAEP Released Reading Item

	Unsatisfactory	Partial	Essential	Extensive	Omitted	Off Task
	Response*	Response*	Response*	Response*		
National	40	24	24	8	3	#
Public					_	
Albuquerque	47	16	26	10	1	#
Atlanta	50	24	17	7	3	#
Austin	43	22	25	6	3	1
Baltimore City	42	28	17	6	6	1
Boston	44	23	18	10	6	1
Charlotte	39	28	24	6	3	1
Chicago	41	25	24	7	3	#
Cleveland	59	19	15	5	3	#
Dallas	48	21	20	4	5	2
Detroit	55	17	16	6	7	#
District of Columbia (DCPS)	49	20	18	5	9	#
Fresno	53	19	19	5	3	1
Hillsborough County	39	23	24	11	3	#
Houston	48	22	20	3	5	2
Jefferson County (KY)	48	25	20	5	2	#
Los Angeles	52	21	17	7	4	#
Miami-Dade	40	27	21	6	5	#
Milwaukee	49	19	18	5	8	1
New York City	40	21	18	10	11	#
Philadelphia	44	22	14	9	11	#
San Diego	39	21	26	7	3	3

United States Department of Education, Institute of Education Sciences, National Center for Education Statistics, retrieved from http://nces.ed.gov/nationsreportcard/itmrlsx/landing.aspx, 2014.

^{*}For a detailed explanation of the differences between performance levels, see http://nces.ed.gov/nationsreportcard/itmrlsx/search.aspx?subject=reading

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GRADE-LEVEL INSTRUCTIONAL MATERIALS EVALUATION TOOL

Grade-Level Instructional Materials Evaluation Tool

Quality Review





The district should begin its textbook adoption process by screening an entire publisher series with the Instructional Materials Evaluation Toolkit (IMET), developed by Student Achievement Partners, to see which ones are worthy of deeper consideration. The IMET, built on the Publishers' Criteria for ELA/Literacy and Mathematics, has two major non-negotiable sections and seven alignment sections. The GIMET-QR mirrors that structure, providing key criteria for each individual grade. But rather than providing an exhaustive list of grade-level standards, GIMET-QR focuses on the most distinctive, key features of the standards by grade, allowing for more in-depth analysis of the quality of the content and the instructional design of the materials—the rigor called for in the Common Core State Standards (CCSS)-English Language Arts and Literacy in History/Social Studies, Science, and Technical Subjects.

This document contains Guiding Statements along with references to the CCSS for each statement. In response to each Guiding Statement, reviewers are asked to cite specific supporting evidence from the materials themselves, rather than relying on the table of contents or the topic headings. Evidence should include scaffolding to support ALL students including English language learners, students with identified disabilities, and struggling readers with the expectation that they learn and achieve the grade-level standards. This supporting evidence can then be used to rate whether and to what degree the criteria have been met. In some cases, reviewers will want to click on the reference links to obtain more detailed information from the Reading, Writing, Speaking and Listening, and Language strands of the CCSS, as well as the Appendices.

The review process culminates with a summary in which reviewers cite strengths and weaknesses of the product, thus providing explicit details for the overall assessment. The summary may also indicate any areas that district curriculum leaders may need to augment or supplement prior to making a recommendation for purchase.



NON-NEGOTIABLE 1: TEXT COMPLEXITY

Assessing text complexity in kindergarten and grade one is more a qualitative than quantitative process. The guiding statements provided in this section will examine text complexity in order to differentiate quality and richness among the texts your district is considering for adoption. To address the kindergarten and grade one standards, the submitted materials need to create the conditions for rich and robust discussion and writing for ALL students (struggling readers, students with identified academic disabilities, English language learners, students who are performing at grade level, and advanced students).

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
Literature and Informational Text 1a. The texts present rich and embedded relationships between and among characters, ideas, and concepts that are conveyed through masterful style and structure. (See exemplars in CCSS, Appendix B)	
1b. The materials consistently include short, challenging, and complete texts that contain rich content, ideas, and academic language worthy of <u>close</u> reading. (See exemplars in CCSS, Appendix B)	
Ic. The materials consistently provide opportunities to read both literary and informational texts. For student reading materials in kindergarten and grade one, refer to the alignment criteria for <i>Foundational Skills</i> (See section IV of this document). Read-aloud anchor texts should fall within or above the grades two through three text complexity band.	
RATING: 4) extensive evidence 3) sufficient evidence	e 2) some evidence 1) weak evidence

NON-NEGOTIABLE 2: QUESTIONS AND TASKS

At least 80% of all questions in the submission are high quality text-dependent and text-specific questions. The overwhelming majority of these questions reference specific text and draw students' attention to the text they are reading. This requirement is already met if the district used the IMET screen. Text-dependent questions that address the kindergarten and grade one standards will be described in greater depth in Alignment Criteria II.

ALIGNMENT CRITERIA I: RANGE AND QUALITY OF TEXTS

Materials must reflect a wide range of text types and genres, as required by the standards. In kindergarten and grade one, and across all other grade levels, there should be ample texts on topics that can support sustained study. Knowledge built at one grade level should be able to be expanded in other grade levels. Topics should also take into account individual student academic needs and interests in order to foster independent reading. It is also imperative that the included topics and themes are provocative or compelling enough to read multiple times and are aligned to district needs. Pay particular attention to the guidance provided in Appendix B of the Common Core State Standards.

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
Literature and Informational Text	
la. The range of materials, both print and digital , allows teachers and students to explore content that coherently and systematically builds knowledge across subjects, themes, and topics. This applies especially to texts read aloud by the teacher, which should promote speaking and listening about topics under study in kindergarten and grade one. (See CCSS Appendix B for examples of grade-level knowledge demands.) Text sets also address a wide variety of student interests, and are likely to foster independent reading.	
1b. Text sets include a diverse range of high quality, culturally responsive, and appropriate topics and themes. Texts from diverse cultures reflect the same high-quality features that are demanded of all texts.	
1c. Materials include a rich and diverse sampling of literary texts, including poems and stories with relevant illustrations.	

 1d. The range of informational texts include: At least two selections on the same topic Selections with various text features such as headings, tables of contents, glossaries, and illustrations 	
1e. Student reading materials contain a range of increasingly challenging selections that allow teachers to build students' ability to comprehend complex text throughout the school year.	
RATING: 4) extensive evidence 3) sufficient evidence	☐ 2) some evidence ☐ 1) weak evidence

ALIGNMENT CRITERIA II. QUESTIONS AND TASKS SUPPORT STUDENT LEARNING

Questions posed to students in the materials under review should support student learning in building reading comprehension, in finding and producing the textual evidence to support responses, and in developing grade-level academic language (IMET). Texts for kindergarten and grade one students must include text-dependent questions that require the use of higher order thinking skills. There should be a range of questions that require students to attend to the author's language as his/her vehicle for conveying meaning, as well as supporting specific inferences and explicit details from the text. Most questions should require that the student refer to the text in several places in order to devise an answer—rather than asking only literal-level, "right there" types of questions.

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
Literature and Informational Text	
2a. Key Ideas and Details. Questions and tasks require students to explicitly attend to the text, including, but not limited to:	
 Asking and answering questions about key details in the text Retelling familiar stories, including key details Identifying and describing characters, settings, and major 	
 events in a story Identifying the main topic of a text Describing the connection between two individuals, events, or ideas in a text 	

2b. Craft and Structure. Questions and tasks require students to explicitly attend to the text, including, but not limited to:	
Determining the meanings of unknown words and phrases in stories, poems, and informational texts	
 Recognizing and explaining the differences between common types of text both literary (such as storybooks and poems) and informational 	
Naming the author and illustrator and describing their roles in telling the story or presenting ideas	
 Recognizing and using various features in informational texts (such as headings or glossaries) to locate information 	
2c. Integration of Knowledge and Ideas. Questions and tasks require students to explicitly attend to the text, including, but not limited to:	
 Comparing and contrasting the experiences of characters in stories 	
Describing the key ideas conveyed in illustrations	
Identifying reasons authors give to support points and the similarities between two texts on the same topic	
RATING: 4) extensive evidence 3) sufficient evidence	2) some evidence1) weak evidence

ALIGNMENT CRITERIA III. WRITING TO SOURCES AND RESEARCH

The writing standards for each grade level highlight distinctive expectations about student writing. In kindergarten and grade one, students perform age-appropriate writing tasks and assignments with support and guidance from the teacher. For details on text types and purposes, production and distribution of writing, research to build and present knowledge, and the range of writing in kindergarten and grade one, see (hot link to the standards). The metrics below show key characteristics to look for in your review of materials.

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
3a. Writing assignments are explicitly connected to what students are reading, and materials are organized to elicit responses to sources in age-appropriate ways, which might include activities such as dictation or making pictures to express thoughts in addition to writing, with support from the teacher.	
3b. Text-dependent questions generally create the foundation for students to address culminating writing tasks, including:	
 Opinion writing, in which students introduce a topic or name a book, state an opinion, and supply a reason for the opinion (using a combination of drawing, dictating, and writing at the kindergarten level) Informative/explanatory writing, in which students name a 	
 topic and supply facts about the topic (using a combination of drawing, dictating, and writing at the kindergarten level) Narrative writing, in which students recount two or more appropriately sequenced events, including details about what happened (using a combination of drawing, dictating, and writing at the kindergarten level) 	
3c. Reading materials can serve as models to explore writer's craft and support student production of grade-level opinion, informational, and narrative writing.	

 3d. Materials include explicit support to teachers, either in the teacher's edition or classroom materials, for writing instruction linked to the kindergarten and grade one writing standards, including: Focusing on a topic, responding to questions from peers, and adding details to strengthen writing as needed Exploring and starting to use a variety of digital tools to produce and publish writing, including in collaboration with peers 	
 3e. Materials provide opportunities and resources for students to participate in shared research and writing projects, including: Recalling information from experiences Gathering information from provided sources 	
RATING: 4) extensive evidence 3) sufficient evidence	□ 2) some evidence □ 1) weak evidence

ALIGNMENT CRITERIA IV: FOUNDATIONAL SKILLS

Effective instruction on foundational skills in kindergarten and grade one includes explicit and systematic lessons and diagnostic support in concepts of print, the alphabetic principle, phonics, phonological awareness, vocabulary development and word recognition, syntax, and reading fluency. Students must be able to recognize and pronounce words fluently in order to focus on the major goal of reading, which is comprehension. Building these foundational skills must be contextualized within the materials.

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
4a. Materials provide teachers with guidance and support for explicit and systematic instruction of the kindergarten and grade one <i>Reading Standards for Foundational Skills</i> (CCSS), including concepts of print, phonological awareness, letter recognition, phonics, word recognition, and reading fluency in a research-based and transparent progression. (Refer to CCSS Appendix A for the research detailing the advancement of foundational reading skills.)	
4b. Materials include a variety of opportunities that allow for systematic and frequent practice of all foundational skills (through such features as engaging texts, games, digital materials, etc.).	
4c. Materials provide regular practice in encoding (spelling) and decoding (reading) the sound symbol relationships of English.	
4d. Materials guide students in reading emergent reader texts for kindergarten and grade-level texts for grade one with purpose and understanding, making frequent connections between the acquisition of foundational skills and access to the meaning of texts (including a set of text-dependent or text-specific questions to check for understanding).	

ALIGNMENT CRITERION V. LANGUAGE

The Common Core State Standards for language focus on ensuring that students gain adequate mastery on a range of language skills and applications. Students are expected to meet each year's grade-specific standards and retain or further develop skills and knowledge (CCSS).

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
Conventions of Standard English	
5a. There is evidence that grade-level grammar and conventions are addressed using an integrated and contextualized approach in daily instruction. Materials and tasks in kindergarten and grade one are designed to help build student understanding and use of:	
Upper- and lower-case letters	
Question words	
Recognition and use of end punctuation	
 Frequently occurring nouns in kindergarten, and common, proper, and possessive nouns by grade one 	
• Frequently occurring verbs in kindergarten, and use of verbs to convey past, present, and future actions in grade one	
 Complete sentences in kindergarten, and compound declarative, interrogative, imperative, and exclamatory sentences in grade one 	
• Capitalization of the first word in a sentence in kindergarten, and of dates and names of people in grade one	
 Correct spelling, by sounding out simple words phonetically in kindergarten and applying common spelling patterns to spell words in grade one 	
Grade One	
Regular plural nouns, with matching verbs	
Personal, possessive, and indefinite pronouns	
 Conjunctions and determiners, such as articles or demonstratives 	
Frequently occurring adjectives	

Vocabulary Acquisition and Use		
5b. The materials provide context, support, and strategies for teaching vocabulary acquisition skills, including:		
Identifying new meanings for familiar words in kindergarten		
Using sentence-level context clues to unlock the meaning of words in grade one		
 Using frequently occurring inflections and affixes as clues to the meaning of words 		
 Using root words (such as look) and their inflectional forms (looks, looked, looking) in grade one 		
5c. The materials provide embedded opportunities for students to encounter and develop an understanding of word relationships and nuances in word meanings.		
RATING: 4) extensive evidence 3) sufficient evidence	2) some evidence	e 🔲 1) weak evidence

ALIGNMENT CRITERIA VI. SPEAKING AND LISTENING

To be CCSS-aligned, speaking and listening must be integrated into lessons, items, and tasks. These must reflect a progression of communication skills required for eventual college- and career-readiness, as outlined in the standards (IMET). If kindergarten and grade one students are able to listen to others, discuss what they are learning, and voice their own confusions or misunderstandings, their learning becomes deeper and more meaningful. They are exposed, at this level, to points of view that may differ from their own, and they learn how to agree and disagree, express their own thoughts, and ask questions when they don't understand or need more clarification.

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
6a. Comprehension and Collaboration. Materials provide a frame that guides student participation in academic conversations by:	
 Agreeing on rules for discussion, taking turns speaking Confirming understanding of texts read aloud 	
 Asking and answering questions to clarify and gather information 	
6b. Presentation of Knowledge and Ideas. Materials include tasks that promote oral responses in a range of collaborative discussions, and support students in:	
Describing people, places, things, and events	
 Using visual displays to add details Speaking audibly and completing sentences	
	e 🖵 2) some evidence 🖵 1) weak evidence

ALIGNMENT CRITERIA VII: SCAFFOLDING AND SUPPORTS

While scaffolds are not a part of the standards themselves, it is important to support teachers in meeting the needs of the range of students in their classrooms.¹ In order to meet the reading, speaking, and writing needs of **all** kindergarten and grade one students, the materials must include supports for students to apply concepts of print, phonics, vocabulary development, syntax, and fluency in comprehending texts. Supports and scaffolds should draw students back to the text rather than pulling their attention away from the text. All scaffolding and support requires on-going formal and informal assessments that provide multiple opportunities for students to demonstrate their proficiency and inform instruction.

As stated in the IMET, it is important to note that scaffolding is not just intended for struggling students, but also for students who are ready for above grade-level work. As text complexity increases, and tasks get increasingly challenging, the need for appropriate scaffolds for above grade-level access is equally important.

GUIDING STATEMENTS	SPECIFIC EVIDENCE FROM THE TEXT/MATERIALS
7a. The texts promote differentiated instruction and instructional conversations about text to support student learning of:	
Academic language	
Linguistic frames	
Repeated grammatical structures and language	
7b. The materials include student supports such as:	
Multiple digital and media versions of texts	
• Illustrations	
Graphs and charts	
Maps and photographs	
 Visual cues/notes that draw attention to words in the text that signal sequence or offer clues to meaning (such as where, when, and how key events occur) 	

1 For additional considerations for ELLs, see A Framework for Raising Expectations and Instructional Rigor for English Language Learners.

Clear guidance for documenting student progress toward meeting grade-level standards	
7d. The materials provide support for students with varying learning styles and modalities (i.e. there are provisions for print, digital, and other multimedia sources for information attainment).	
 7e. The materials include assessments along with: Suggestions for next steps to address a spectrum of performances and needs based on assessment results Opportunities for students to demonstrate their expertise through the use of performance tasks Pieces of challenging and complete text that can be used to assess student understanding and next instructional steps Reading selections and questions that progress in a logical sequence for gradual release² Enrichment tasks for students who are on target for meeting grade-level expectations Steps to take when evidence suggests that students are starting to fall behind RATING: 4) extensive evidence 3) sufficient evidence 2) some evidence 1) weak evidence 	

² Gradual release: scaffolding of instruction so that students develop the ability to read and complete tasks and assignments independently and proficiently.

DECISION RECORDING SHEET

Met or not met?
(Average scores from Non-Negotiable 1 and Alignment Criteria IV and VII)
Comments:

Do the materials offer a focus for writing instruction that requires evidence-based writing and address increasingly demanding content and sources?

Evidence-Based Reading and Writing:

- How well do the materials include text-dependent questions that require students to attend to the author's craft (i.e., use of word choice, syntax, figurative devices to convey meaning or stance)?
- Do the materials consistently and adequately require students to attend to the author's language as his/her vehicle for conveying meaning, as well as, supporting specific inferences from the text?
- Do most questions require students to refer to the text in several places in order to devise an answer rather than literal-level, "right there" types of questions?

Met or not met?

(Average scores from Alignment Criteria II, III, , and V)

Comments:

Do the materials allow students to integrate knowledge and ideas over time?

Building Background Knowledge Using Rich Informational Text:

- Do the materials provide a wide range of rich and diverse texts that explore a sustained topic?
- Within the grade level and across other grade levels, are there ample texts on topics that can sustain study of that topic for a period of time?
- Do the materials have enough information to support short research tasks that build student knowledge on a topic and can be expanded in upcoming grades?
- Do student tasks promote robust academic conversations around the texts and serve as models for academic language, writing craft and text structure?
- Do students have sustained coherent opportunities to build knowledge and familiarity on a topic/theme within and across grades?

Met or not Met?

(Average scores from Alignment Criteria I and VI)

Comments:

ADOPTION DECISION RECORDING SHEET

Completed by:	Date:
After completing reviews of kindergarten and grade of your recommendations on this form. Thank you for y	one materials for all series the district is considering for adoption, summarize our review.
you would recommend them for adoption. The program or	the materials you reviewed, based on all the analysis you have made, in the order in which materials with your highest recommendation should be listed as number one below. e answers to the following questions based on the evidence cited in your materials review: nent the textbook series?
Recommended	Comments:
1. [Enter name of program] [short description]	
[Enter name of program] [short description]	
3. [Enter name of program] [short description]	
Not Recommended	Comments:
1. [Enter name of program] [short description]	
[Enter name of program] [short description]	

Textbooks and their digital counterparts are vital classroom tools but also a major expense, and it is worth taking time to find the best quality materials for students and teachers. While there is no perfect set of materials or textbooks, this Grade-Level Instructional Materials Evaluation Tool-Quality Review (GIMET-QR) is designed for use by professionals as a framework for evaluating the quality of instructional materials and choosing materials that are best suited to provide a coherent learning experience for students.

The district should begin its textbook adoption process by screening an entire publisher series with the Instructional Materials Evaluation Toolkit (IMET), developed by Student Achievement Partners, to see which ones are worthy of deeper consideration. The GIMET-QR can then be used to evaluate materials for each individual grade. But rather than providing an exhaustive list of grade-level standards, GIMET-QR starts with the progression to algebra continuum as the major area of focus, allowing for the in-depth review of a smaller set of mathematical concepts covered in the Common Core State Standards Mathematics (CCSS-M) at each grade level.

The GIMET-QR focuses on both the quality of the <u>content</u> and the instructional <u>design</u> of materials, with a specific focus on evaluating whether materials contain a balance of the three components of rigor—conceptual understanding, applications, and fluency—called for in CCSS-M. Unlike many tools that evaluate the presence or absence of required content, the GIMET-QR prompts reviewers to ask, "How <u>well</u> do the materials and assignments reflect and support the rigor of the CCSS-M?"

To answer this question, GIMET-QR contains Guiding Statements along with references to the CCSS for each statement. In response to each Guiding Statement, reviewers are asked to cite specific supporting evidence from the materials themselves, rather than relying on the table of contents or the topic headings. This supporting evidence can then be used to rate whether and to what degree the criteria have been met so that all students have access to a quality mathematics program.

It is important to keep in mind that quality is not defined as "compliance" or a mere checklist of topics. The GIMET-QR aims to help schools and districts choose materials that will provide the best overall learning experience for their students. The distinctive features of instructional materials that contribute to engaging students in mathematics, like style and appeal, should therefore be considered along with the mathematical content and cognitive demand.

The review process culminates with a summary in which reviewers cite strengths and weaknesses of the product, thus providing explicit details for the overall assessment. The summary may also indicate, prior to making a recommendation for purchase, any areas that district curriculum leaders may need to augment or supplement.

The Structure of GIMET-QR.

The GIMET-QR for Mathematics is divided into four sections:

I. CCSS-M clusters and standards along the algebra progression for kindergarten students.

This first section focuses on the content of the materials under review and on the quality of the explanations and connections that develop the concepts and skills for the algebra continuum in kindergarten. This section features "guiding statements" that require reviewers to examine the quality of the materials, as well as the assignments that address the level of rigor in CCSS-M. The statements about materials and assignments are similar but their focus is different. While the materials statements ask the reviewer to show evidence about the quality of how concepts and skills are attended to in the text or digital resource under review, the assignments statements ask the reviewer to cite evidence that students are given the opportunity to apply their understanding of those concepts and skills.

II. Quality Criteria for Conceptual Understanding, Applications, and Fluency with an accompanying rubric for high quality/exciting materials and assignments

The second section asks the reviewer to reflect on the findings from the first section to answer the question of how well the materials reflect and support the rigor of the CCSS-M. The section also includes a rubric which describes high quality/exciting materials and establishes criteria for both materials and assignments. Reviewers are asked to consider how well the materials engage both students and teachers. Judgments are made after organizing the evidence around each of three dimensions of rigor—conceptual understanding, applications, and fluency. For each of these dimensions, reviewers have access to a rubric reflecting the highest rating. Reviewers assign one of three ratings: *High Quality/Exciting, Good Quality or Minimal Quality/Boring*.

III. Decision Recording Sheets

The third section, to be completed after reviewing multiple submissions for adoption, is a *Decision Recording Sheet*. This provides reviewers with an opportunity to list their top three choices and cite specific strengths and weakness for all of the materials being reviewed.

IV. Appendix

The fourth section is an Appendix that includes two items: *The Progression to Algebra Continuum* and a table of *Common Addition and Subtraction Situations*.¹

¹ From pages 89-90 of the Common Core State Standards for Mathematics. Adapted from Box 2-4 of Mathematics Learning in Early Childhood, National Research Council (2009, pp. 32-33).

Getting Started. Completing the GIMET-QR entails a four-step process. Raters are expected to read through each of the steps and their explanations and locate all the pertinent tables and pages before you start. Then complete each step.

Step one – Individual reviewers will evaluate how well the materials and their accompanying assignments develop the algebra continuum content for each grade level. Use the tables that start on page four to capture the evidence of how and where the materials do this. The purpose for noting specific examples as evidence is to contribute to discussions with other reviewers in steps two through four. Cite specific examples of the explanations, diagrams, and pictorial representations in the materials and assignments that prompt students to show their understanding. Additionally, reviewers should consider the interaction of students with the materials in two areas: 1) students as receptive learners (interactions with the explanations and illustrations in the materials) and 2) students producing and showing their understanding (interacting and completing the assignments in the materials).

Step two – Discuss your findings and evidence with other reviewers. Reviewers should discuss the evidence cited and use it to confirm or assist you (individually) in reviewing and revising your findings.

Step three – Next, reviewers need to consider the interaction of students and teachers with the content of the materials along three dimensions of rigor—**conceptual understanding**, **applications**, and **fluency**—to assign a judgment of quality to each dimension. Reviewers should answer the question: How well do the materials overall reflect and support the rigor of the CCSS-Mathematics? Beginning on page 10, reviewers will use the guiding questions together with the rubric describing **high quality** to assign ratings. Consider the totality of the collected evidence along the dimensions of rigor and record your rating at the bottom of each table.

The highest level of quality is described using the words "High Quality/Exciting." We use these words to indicate a high degree of excitement about the materials and the assignments. As you consider the descriptors, keep in mind that, to reach the level of "High Quality/Exciting," all of the criteria for each dimension of rigor must be present. To earn this rating, the evidence must demonstrate the grade-level rigor of the CCSS-M in an engaging way.

The other levels represent varying degrees of quality. For example, "Good Quality" indicates that materials are workable or sufficient, and do not require a substantial amount of supplementation. "Minimal Quality/Boring," meanwhile, indicates that the materials are sufficient on their own, but would not be conducive to motivating students. If a program was rated "Minimal Quality/Boring," then teachers would have to continue to supplement the materials with others, possibly resulting in disjointed instruction.

These descriptions will be used for rating the overall quality of the program.

Step four – Discuss your findings and conclusions with other reviewers. After discussions, make final recommendations on the *Decision Recording* sheet.

Mathematics: Kindergarten

Guiding Statements	Specific Evidence from the Text/Materials
	•
K.CC.1-3. Materials connect multiple representations of numbers to their names and explain how to:	
 Use a variety of representations to count to 100 by ones and by tens Count forward beginning from a given number within the known sequence (instead of having to begin at 1) Write numbers from 0 to 20 and explain how a number of objects can be described with a written numeral 0–20 (with 0 representing a count of no objects) 	
K.CC.1-3. Assignments ask students to connect multiple	
representations of numbers to names and the count sequence by:	
Prompting students to count to 100 by ones and by tens using a	
variety of materials/representations and mentally	
Asking them to count forward beginning from a given number	
within the known sequence (instead of having to begin at 1)	
Writing numbers from 0 to 20 and representing them in multiple ways (e.g., counters, drawings, manipulatives,	
numbers) and to represent a number of objects with a written	
numeral 0–20 (with 0 representing a count of no objects)	
K.CC.4-5. Materials represent numbers in multiple ways and	
explain how to count to tell the number of objects.	
Materials explain the relationship between numbers and	
quantities, connect counting to cardinality, and demonstrate how	
to: Say numbers in the standard order when counting	
 Say numbers in the standard order when counting objects, pairing each object with one and only one 	
number and each number with one and only one object	
 Understand that the last number tells the total number 	
of objects counted and that the number of objects is the	
same regardless of their arrangement or the order in	
which they were counted (i.e., the materials show how	
to count objects arranged in a line—the easiest	
arrangement, then in more difficult arrangements, such	
as rectangular arrays (students need to ensure they	
count each object in every row or column and do not repeat rows or columns), circles (students need to stop	
just before the object they started with), and scattered	
just before the object they started with, and scattered	1

Mathematics: Kindergarten

Mathematics: Kindergarten

Guiding Statements	Specific Evidence from the Text/Materials
cardinalities of small groups without having to count the objects. This is called <i>perceptual subitizing</i> . Perceptual subitizing develops into <i>conceptual subitizing</i> —recognizing that a collection of objects is composed of two subcollections and quickly combining their cardinalities to find the cardinality of the collection (e.g., seeing a set as two subsets of cardinality 2 and saying "four")].	
 K.CC.6–7. Materials show and explain multiple ways to compare numbers by: Showing how to identify whether the number of objects in one group is greater than, less than, or equal to the number of objects in another group, e.g., by using matching and counting strategies Comparing two numbers between one and 10 presented as written numerals in a variety of wayswith real objects, drawings, counting, subitizing, etc. K.CC.6–7. Assignments ask students to use and explain multiple ways to compare numbers by: Asking students to create two groups of objects in which one is greater than, less than, or equal to the number of objects in the other group Prompting students to match the objects in the two groups to see if there are any extra and then to count the objects in each group and use their knowledge of the count sequence to decide which number is greater than the other (the number farther along in the count sequence) Later, asking students to demonstrate that even if one group looks as if it has more objects (e.g., has some extra sticking out), matching or counting may reveal a different result Asking students to compare two numbers between one and 10, presented as written numerals in a variety of ways: with real objects, drawings, counting, subitizing, etc. 	
 K.OA.1–5. Materials present addition as putting together and adding to, and subtraction as taking apart and taking from, by showing and demonstrating: How to represent addition and subtraction with objects, fingers, mental images, drawings, sounds (e.g., claps), acting out situations, verbal explanations, expressions, or equations. The 	

Mathematics: Kindergarten

	tics: Kindergarten
Guiding Statements	Specific Evidence from the Text/Materials
materials include written expressions (e.g., 3–1) to represent operations, as well as equations that represent the whole situation before the solution (e.g., 3 - 1 = □) or after (e.g., 3 - □ = 2). Expressions like 3-1 or 2+1 show the operation, and it is helpful for students to have experience solelywith the expression so they can conceptually chunk this part of the equation. Equations with one number on the left and an operation on the right (e.g., 5 = 2 + 3 to record a group of 5 things decomposed as a group of 22 things and a group of 3 things) allow students to understand in various ways how quantities on both sides have the same value. • How to develop the academic language of addition and subtraction. For example, using the term "total" in addition problems instead of the term "sum." "Sum" sounds the same as "some," but has the opposite meaning. "Sum" is used to describe problem situations with one or both addends unknown, so it is better in the earlier grades to use "total" rather than "sum." Formal vocabulary for subtraction ("minuend" and "subtrahend") is not needed in kindergarten. • How to solve a range of addition and subtraction word problems and add and subtract within 10, e.g., by using objects or drawings to represent addition and subtraction problems. Add to/take from situations are action-oriented—they show changes from an initial state to a final state. These situations are readily modeled by equations because each aspect of the situation has a representation as a number, operation (- or +), or equal sign =. In Kindergarten, students work with the following four types of addition and subtraction situations: Add To with Result Unknown A + B = ②; and Put Together/Take Apart with Total Unknown C - B = ②; and Put Together/Take Apart with Total Unknown A + B = ② and Both Addends Unknown C = + ③ (see the dark shaded types in Table 2 included as Appendix B). • How to decompose numbers less than or equal to 10 into pairs in more than one way, e.g., by using objects or drawings, and record each de	
or drawings, and recording the answer with a drawing or equation	

Mathematics: Kindergarten

Guiding Statements	Specific Evidence from the Text/Materials
 How to practice adding and subtracting within 5 K.OA.1–5 Assignments ask students to add by putting together and adding to, and to subtract by taking apart and taking from by: Representing addition and subtraction in multiple ways, including with objects, fingers, mental images, drawings, sounds (e.g., claps), acting out situations, verbal explanations, expressions, and/or equations and explaining correspondences among different representations Solving a range of addition and subtraction word problems: Add To with Result Unknown; Take From with Result Unknown; and Put Together/Take Apart with Total Unknown and Both Addends Unknown (see the dark shaded types in Table 2 in appendix B). Add To/Take From situations are action-oriented; they show changes from an initial state to a final state. These situations are readily modeled by equations because each aspect of the situation is represented as a number, operation (- or +), or equal sign =. Mathematizing a real-world situation (MP4), focusing on quantities and their relationships rather than non-mathematical aspects of the situation Decomposing numbers less than or equal to 10 into pairs in more than one way, e.g., by using objects or drawings, and record each decomposition by a drawing or equation (e.g., 5 = 2 + 3 and 5 = 4 + 1) Creating and using Putting Together/Take Apart situations with Both Addends Unknown. These play an important role in Kindergarten because they show how students understand various compositions that define or make up each number. For any number from 1 to 9, finding the number that makes 10 when added to the given number, e.g., by using objects or drawings, and recording the answer with a drawing or equation Adding and subtracting within 5 with accuracy and reasonable speed 	
 K.NBT.1. Materials demonstrate working with numbers 11-19 to develop a foundation for understanding place value by explaining and showing how to: Compose and decompose numbers from 11 to 19 into ten ones and some further ones, e.g., by using objects or drawings, and record each composition or decomposition with a drawing or equation (e.g., 18 = 10 + 8); understanding that these numbers 	

Mathematics: Kindergarten

Wathematics. Kindergarten					
Guiding Statements	Specific Evidence from the Text/Materials				
are composed of ten ones and one, two, three, four, five, six, seven, eight, or nine ones. This is a vital first step kindergarteners must take toward understanding base-ten notation for numbers greater than 9. (See the NBT Progression.) K.NBT.1. Assignments require students to work with numbers 11- 19 and explain their understanding of place value by: • Composing and decomposing numbers from 11 to 19 into ten ones and some further ones, e.g., by using objects or drawings, and recording each composition or decomposition with a drawing or equation (e.g., 18 = 10 + 8) • Showing understanding that these numbers are composed of ten ones and one, two, three, four, five, six, seven, eight, or nine ones					



Overarching Question: How well do the materials reflect and support the rigor of the CCSS-Mathematics?

Rigor requirement: A program that emphasizes only fluency is not rigorous. Likewise, a program that only focuses on applications or conceptual understanding is not rigorous. For a program to be rigorous, there must be a balance of all three (conceptual understanding, applications, and fluency).

Use the evidence that you collected for kindergarten to begin the process of initially judging the overall quality of the program. Begin by answering the question: From the evidence collected, how well do the materials reflect and support the rigor of the CCSS-M? Use the accompanying rubric, which contains the criteria for high quality/exciting materials and assignments that engage both students and teachers.

Criteria for Rigor and Quality in Conceptual Understanding, Applications, and Fluency

Conceptual Understanding: Connections

Materials:

- How well do the materials develop conceptual understanding of operations and algebraic thinking as defined in the CCSS-M and connected in the *Progression to Algebra (Appendix A)*?
- How well do the materials connect to and extend prior knowledge?
 - The materials present and describe explicit connections to prior knowledge, connections among mathematical ideas, and connections among different mathematical representations, using appropriate academic language.
- How well do the materials develop academic language (including words, phrases, and sentences using symbols, graphs, and diagrams)?

Assignments:

- How well does the set of assignments prompt students to produce explanations and viable arguments?
 - The set of assignments challenge students to use their mathematical knowledge, academic language, and skills to solve problems and formulate mathematical models in a variety of contexts.
- How well does the set of assignments ask students to make explicit connections to prior knowledge, connections among mathematical ideas and connections among different mathematical representations?

<i>High Quality/Exciting (3)</i> \square	Good Quality (2) \square	Minimal Quality/Boring (1)
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CONCEPTUAL UNDERSTANDING—CONNECTIONS QUALITY LEVEL: HIGH QUALITY/EXCITING (3)

COLICELL	CAL CIDERSTANDING—CONNECTIONS	QUALITY LEVEL. HIGH QUALITY EXCITING (3)
	Materials	Assignments
	The materials present and describe explicit connections to prior	The assignments in the materials encourage students to have a
	knowledge, mathematical ideas and different mathematical	growth mindset by challenging students to use their mathematical
	representations, using appropriate academic language.	knowledge, academic language, and skills to solve problems and
		formulate mathematical models in a variety of contexts.
Student	Using high quality/exciting materials, my students will:	Using high quality/exciting assignments, my students will:
	• comprehend the concepts and connections in the materials	• engage in the challenge of comprehension and discussion
	make sense of the mathematics	make sense of the mathematics
	be excited to try the problems and learn from working on	be excited to try the problems and learn from working on
	them	them
	• want to learn the mathematical concepts and gain confidence	• want to learn the mathematical concepts and gain confidence
	that effort to learn will pay off	that effort to learn will pay off
Teacher	Using high quality/exciting materials will help me:	Using high quality/exciting assignments will help me:
	• see and understand the mathematical goals of the lesson/unit	• want to learn more from interacting with students, analyzing
	• understand better the mathematics that I am teaching, learn	their work on assignments, and re-engaging them in the
	more mathematics from the materials, and want to learn more	concepts related to the assignments
	from interacting with students	• use students' responses to focus their efforts on the
	be excited about teaching the lessons and see how students	mathematical connections and give them feedback on how to
	respond to the connections in the lesson/unit	do better
	• focus students' efforts on the mathematical connections and	• anticipate typical misconceptions, missing connections, and
	give them feedback on how to do better	which struggles will be most productive for students
	• anticipate typical misconceptions, missing connections, and	know students will be motivated to learn from and connect
	which struggles will be most productive for students	the mathematics as well as gain confidence that their efforts
	be confident students will be motivated to learn from, and	to learn will pay off
	connect the mathematics as well as gain confidence that their	1.0
	_	
	efforts to learn will pay off	

Mathematics: Kindergarten

Conceptual Understanding: *Explanations*

Materials:

- how contexts and illustrations make a concept more visible
- how a way of thinking about a problem makes sense using several representations and explicitly identifying correspondences across representations
- why a statement or steps in an argument or solution is true and under what conditions it is true
- how abstractions and generalizations are used to formulate the mathematical structure that organizes seemingly scattered individual events or results

Assignments:

The set of assignments requires students to use appropriate content and grade level academic language in providing explanations to show:

- how their approach to a problem makes sense to them
- why reasons and justifications for steps in a solution or an argument are valid
- how the mathematical structure organizes seemingly scattered statements or results to represent generalizations mathematically to their peers and the teacher



Mathematics: Kindergarten

CONCEPT	UAL UNDERSTANDING—EXPLANATIONS	QUALITY LEVEL: HIGH QUALITY/EXCITING (3)
	Materials The materials provide example explanations, using appropriate concepts and academic language for the grade level, to show how a way of thinking about a problem makes sense using several representations and explicitly identifying correspondences across representations.	Assignments The set of assignments requires students to use appropriate grade level concepts and academic language to explain why reasons and justifications for steps in a solution or an argument are valid and how the mathematical structure represents generalizations about a problem situation (context) mathematically to their peers and the teacher
Student	 Using high quality/exciting materials, my students will: comprehend the explanations presented in the materials make sense of the mathematics of the lesson/unit be excited to try the problems and learn from working on them want to learn the related mathematical concepts and gain confidence that effort to learn will pay off 	 Using high quality/exciting materials, my students will: engage in the challenge of comprehension and explanation with their peers and with me make sense of the mathematics of the lesson/unit be excited to try the problems and learn from working on them want to learn the related mathematical concepts and gain confidence that effort to learn will pay off
Teacher	 Using high quality/exciting materials will help me: see and understand the mathematical goals of the lesson/unit understand better the mathematics that I am teaching, learn more mathematics from the materials, and want to learn more from interacting with students be excited about teaching the lessons and see how students respond to the explanations in the lesson/unit focus students' efforts on the mathematical explanations and give them feedback on how to do better anticipate typical misconceptions, struggles that are most productive for students, and ways to help students to revise their explanation 	 Using high quality/exciting materials will help me: want to learn more from interacting with students, analyzing their work on assignments, and re-engaging them on the concepts related to the assignments use the student's responses to focus their efforts on the mathematical connections and give them feedback on how to do better; anticipate typical misconceptions, struggles that are most productive for students, and ways to help students revise their explanations know students will be motivated to learn from and connect the mathematics as well as gain confidence that their efforts to learn will pay off prompt students to make their explanations public in a way that others can understand it and critique it

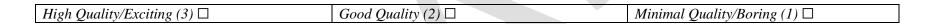
Applications

Materials

- How well do the materials develop students' expertise in the application of concepts appropriate for kindergarten?
- Materials analyze problem situations, showing how to use mathematics to help make sense of and solve them.
- Materials provide examples of how mathematical standards are deployed to make sense of problems.

Assignments

- How well does the set of assignments develop a students' application of concepts?
- The set of assignments prompts students to use mathematics and mathematical standards to help them make sense of and solve a variety of problems, appropriate for kindergarten.
- The set of assignments asks students to formulate mathematical models of real world phenomena, including explaining assumptions and explaining why the model serves its purpose in a reasonable way.



Mathematics: Kindergarten

APPLICATIONS QUALITY LEVEL: HIGH QUALITY/EXCITING (3)

	Materials	Assignments
	The materials show how to use mathematics to analyze problem situations, appropriate for the grade level, and provide examples of deploying the mathematical practice standards to make sense of problems.	The set of assignments prompts students to use mathematics and the mathematical practice standards to help them make sense of a variety of problem, appropriate for kindergarten, by asking students to formulate mathematical models
Student	 Using high quality/exciting materials, my students will: apply the concepts and connect them to each other and their different representations make sense of the mathematics of the lesson/unit be excited to try the problems and learn from working on them understand how to formulate and mathematically model problem situations gain confidence that their effort to learn will pay off 	 Using high quality/exciting assignments, my students will: be challenged to use their mathematics to comprehend, analyze, and make sense of the problem situation make sense of quantities and their relationship in the problem situation represent the problem concretely and pictorially and represent it as an equation and explain how the two representations relate to each other identify important quantities in a practical situation and map their relationships using such tools as concrete models, diagrams, and equations formulate and model mathematically problem situations; (use phrase for upper grades) engage in discussions with their peers and the teacher to make sense of the problem and learn from them be excited to try the problems and learn from working on them; gain confidence that their effort to learn will pay off
Teacher	 Using high quality/exciting materials will help me: see and understand the mathematical goal of the lesson/unit understand better the mathematics that I am teaching, learn more mathematics from the materials, and want to learn more from interacting with students be excited about teaching the lessons and see how students respond to the problems/tasks in the lesson/unit be confident he or she can focus students' efforts on the mathematical tasks/problems and give them feedback on how to do better anticipate typical misconceptions, missing connections, and which struggles will be most productive for students be confident students will be motivated to learn 	 Using high quality/exciting assignments will help me: prompt students to make their thinking public in a way that others can understand it and critique it want to learn more from interacting with students, analyzing their work on problems/tasks, and re-engaging them on making use of concepts related to them use the student's responses to focus their efforts on strategic thinking and give them feedback on generalizing to other related applications anticipate typical misconceptions, missing strategies, and which productive struggles will be most beneficial for students gain confidence that their efforts to learn will pay off

Mathematics: Kindergarten

Fluency

Materials:

- How well do the materials focus on developing critical procedural skills and fluency?
 - Materials show how the standard for fluency for this grade level works and provides opportunities for students to practice using an algorithm, procedure or formula.

Assignments:

- How well does the set of assignments focus on developing critical procedural skills and fluency?
 - The set of assignments prompts students to develop and demonstrate fluency by recalling with accuracy and reasonable speed the grade level skills and procedures.

Fluency requirements for kindergarten: add and subtract within five

 $\textit{High Quality/Exciting (3)} \ \square \qquad \qquad \textit{Good Quality (2)} \ \square \qquad \qquad \textit{Minimal Quality/Boring (1)} \ \square$

Mathematics: Kindergarten

FLUENCY QUALITY LEVEL: HIGH QUALITY/EXCITING (3)

	Materials Materials show how the standard for fluency for this grade level works and provides opportunities for students to practice using analgorithm, procedure or formula.	Assignments The set of assignments prompts students to develop and demonstrate fluency by recalling with accuracy and reasonable speed the grade level skills and procedures.
Student	 Using high quality/exciting materials, my students will: have a variety of different ways to practice using an algorithm, procedure, or formula to develop fluency self-assess areas of weakness and strengths for adding and subtracting to five and receive feedback on which area(s) to improve 	 Using high quality/exciting assignments, my students will: build skills in adding and subtracting to five flexibly, accurately, efficiently, and appropriately gain confidence that their efforts to learn will pay off
Teacher	 Using high quality/exciting materials will help me: see and understand how the work on procedural fluency supports the mathematical goal of the lesson/unit be confident he or she can focus students' efforts on building fluency, that is see how to assist students understand and correct their mistakes be confident students will be motivated to learn 	 Using high quality/exciting assignments will help me: want to learn more from interacting with students, use the student's responses to focus their efforts on building fluency and give them feedback on how to do better see how to assist students understand and correct their mistakes be confident students will be motivated to learn

Decision Recording Sheet

Date:

Completed by:

Based on the substantial evidence collected, please rank the materials you reviewed, based on all the analysis you have done, in the order in which you would recommend the materials for adoption. The program or materials with your highest recommendation should be listed as number one below. Please provide any comments you deem pertinent. For example, based on the evidence cited:

1) What are the top three strengths of this text? 2) What are the areas needing improvement? 3) What additional supports would be needed to implement the textbook series?

Thank you for your review.

Recommended Comments (optional)	Comments (optional):
[Enter name of program] [short description]	For example, based on the evidence cited, what are the top three strengths of this text? What are the areas needing improvement? What additional supports would be needed to implement the textbook series?
[Enter name of program] [short description]	
3. [Enter name of program] [short description]	

Mathematics: Kindergarten

[Enter name of program] [short description]	
Not Recommended	Comments (optional)
[Enter name of program] [short description]	
[Enter name of program] [short description]	
[Enter name of program] [short description]	

K	1	2	3	4	5	6	7	8
Know number names and the count sequence Count to tell the number of objects Compare numbers Understand addition as putting together and adding to, and understand subtraction as taking apart and taking from Work with numbers 11-19 to gain foundations for place value	Represent and solve problems involving addition and subtraction Understand and apply properties of operations and the relationship between addition and subtraction Add and subtract within 20 Work with addition and subtraction equations Extend the counting sequence Understand place value understanding and properties of operations to add and subtract Measure lengths indirectly and by iterating length units	Represent and solve problems involving addition and subtraction Add and subtract within 20 Understand place value Use place value understanding and properties of operations to add and subtract Measure and estimate lengths in standard units Relate addition and subtraction to length	Represent & solve problems involving multiplication and division Understand properties of multiplication and the relationship between multiplication and division Multiply & divide within 100 Solve problems involving the four operations, and identify & explain patterns in arithmetic Develop understanding of fractions as numbers Solve problems involving measurement and estimation of intervals of time, liquid volumes, & masses of objects Geometric measurement: understand concepts of area and relate area to multiplication and to addition	Use the four operations with whole numbers to solve problems Generalize place value understanding for multi-digit whole numbers Use place value understanding and properties of operations to perform multi-digit arithmetic Extend understanding of fraction equivalence and ordering Build fractions from unit fractions by applying and extending previous understandings of operations Understand decimal notation for fractions, and compare decimal fractions	Understand the place value system Perform operations with multi-digit whole numbers and decimals to hundredths Use equivalent fractions as a strategy to add and subtract fractions Apply and extend previous understandings of multiplication and division to multiply and divide fractions Geometric measurement: understand concepts of volume and relate volume to multiplication and to addition Graph points in the coordinate plane to solve real-world and mathematical problems*	Apply and extend previous understandings of multiplication and division to divide fractions by fractions Apply and extend previous understandings of numbers to the system of rational numbers Understand ratio concepts and use ratio reasoning to solve problems Apply and extend previous understandings of arithmetic to algebraic expressions Reason about and solve one-variable equations and inequalities Represent and analyze quantitative relationships between dependent and independent variables	Apply and extend previous understanding of operations with fractions to add, subtract, multiply, and divide rational numbers Analyze proportional relationship and use them to solve real-world and mathematical problems Use properties of operations to generate equivalent expressions Solve real-life and mathematical problems using numerical and algebraic expressions and equations	Work with radical and integer exponents Understand the connections between proportional relationships, lines, and linear equations Analyze and solve linear equations and pairs of simultaneous linear equations Define, evaluate, and compare functions Use functions to model relationships between quantities*

Mathematics: Kindergarten

Appendix B From the K, Counting and Cardinality; K-5, Operations and Algebraic Thinking Progression p. 9

Table 2: Addition and subtraction situations by grade level.						
	Result Unknown	Change Unknown	Start Unknown			
Add To	A bunnies sat on the grass. B more bunnies hopped there. How many bunnies are on the grass now? $A+B=\square$	A bunnies were sitting on the grass. Some more bunnies hopped there. Then there were C bunnies. How many bunnies hopped over to the first A bunnies? $A+ \square = C$	Some bunnies were sitting on the grass. B more bunnies hopped there. Then there were C bunnies. How many bunnies were on the grass before? $\Box + B = C$			
Take From	C apples were on the table. I ate B apples. How many apples are on the table now? $C-B=\square$	C apples were on the table. I ate some apples. Then there were A apples. How many apples did I eat? $C - \Box = A$	Some apples were on the table. I ate B apples. Then there were A apples. How many apples were on the table before? $\Box - B = A$			
	Total Unknown	Both Addends Unknown ¹	Addend Unknown ²			
Put	A red apples and B green apples are on the table. How many apples are on the table?	Grandma has C flowers. How many can she put in her red vase and how many in her blue vase?	C apples are on the table. A are red and the rest are green. How many apples are green?			
Together /Take Apart	<i>A</i> + <i>B</i> = □	C = □ + □	$A + \square = C$ $C - A = \square$			
	Difference Unknown	Bigger Unknown	Smaller Unknown			
Compare	"How many more?" version. Lucy has A apples. Julie has C apples. How many more apples does Julie have than Lucy?	"More" version suggests operation. Julie has B more apples than Lucy. Lucy has A apples. How many apples does Julie have?	"Fewer" version suggests operation. Lucy has B fewer apples than Julie. Julie has C apples. How many apples does Lucy have?			
	"How many fewer?" version. Lucy has A apples. Julie has C apples. How many fewer apples does Lucy have than Julie? $A + \Box = C$	"Fewer" version suggests wrong operation. Lucy has B fewer apples than Julie. Lucy has A apples. How many apples does Julie have?	"More" version suggests wrong op- eration. Julie has B more ap- ples than Lucy. Julie has C ap- ples. How many apples does Lucy have?			
	C − A = □	A + B = □	$C - B = \square$ $\square + B = C$			

ACADEMIC KPI PROJECT

Academic Key Performance Indicators in America's Urban Public Schools

ACADEMIC INDICATORS (20 OUTCOME)

Early Childhood

Percent of Students Advancing from Pre-K to K, by Subgroup

Percent of 3rd Graders Proficient in Reading Assessment

Algebra I/Integrated Math I Achievement

Algebra I/Integrated Math I Completion Rate for Credit by Grade 9, by Subgroup

- Percent Completed Algebra I/Integrated Math I in Grade 7, by Subgroup
- Percent Completed Algebra I/Integrated Math I in Grade 8, by Subgroup
- Percent Completed Algebra I/Integrated Math I in Grade 9, by Subgroup

High School On-Track

Ninth Grade Course Failure Rate - One Core Course, by Subgroup

Ninth Graders with B Average GPA or Better, by Subgroup

Student Attendance

Absence Rate, by Grade Level + Subgroup

Student Suspensions

Suspension Rate, by Subgroup

Instructional Days Missed per Student Due to Suspensions, by Subgroup

Graduation Rate

Four-Year Graduation Rate, by Subgroup

Five-Year Graduation Rate, by Subgroup

ELP Acquisition

ELP Acquisition for ELLs, by Initial ELP Level, Grade, and Time in Program

Credit Recovery Options

Credit Recovery Success Rate for High School Summer School, by Subgroup

Pass Rate for High School Summer School, by Subgroup

Credit Recovery Success Rate in Virtual Courses, by Subgroup

Pass Rate in Virtual Courses, by Subgroup

Credit Recovery Success Rate through Reenrollment, by Subgroup

Advanced Programs and Early College

AP Participation Rate, by Subgroup

AP-Equivalent Participation Rate, by Subgroup

AP Exam Pass Rate, by Subgroup

Early College Enrollment in High School, by Subgroup

COST INDICATORS (18)

Early Childhood

Early Childhood Education Costs per Student

Class Size Reduction

Class Size Reduction Cost per Student for Grades 1-3

Professional Development

New Teacher Induction Program Cost per Participant

Credit Recovery Options Costs

Cost per Student for High School Summer School Credit Recovery Programs

Summer School Cost per Student for High School

Cost per Student of Virtual Courses for Credit Recovery

Advanced Programs and Early College Costs

AP Course Costs per Passing AP Score

Early College Costs per Participant

Intervention/Extended Time

Cost of Extended Learning Time Initiatives as Percent of District Budget

Cost of Intervention Programs as Percent of District Budget

Instructional Coaches

Instructional Coaches Cost as Percent of District Budget

Supplemental Educational Services

Cost of Supplemental Educational Services as Percent of District Budget

Cost of Supplemental Educational Services per Student Served

Cost of Supplemental Educational Services per Student Served – District-Operated

Cost of Supplemental Educational Services per Student Served – Contractor-Operated

Cost of Substitute Teachers

Cost of Substitute Teachers as Percent of District Budget

ELL Central Office Costs

ELL Central Office Costs per ELL Student

ELL PD Costs for Central Office per ELL Student

SPED-SPECIFIC INDICATORS (13 COST, 7 OUTCOME)

General SPED Costs

SPED Budget - Cost per Student with IEP

SPED Budget - Percent of District Expenditures

Professional Development Costs as Percent of SPED Budget

SPED Educational Setting

Percent of Students Placed in Each Educational Setting

- Receiving education inside general education more than 80% of the time
- Receiving education inside general education between 40% and 80% of the time
- Receiving education inside general education less than 40% of the time
- Placed in separate schools, residential facilities, or homebound/hospital

Private/Separate School Placement Costs as Percent of SPED Budget

Private/Separate School Placement Costs per Student

Percent of SWDs Placed in Private/Separate Schools

SPED Evaluations and IEP Meetings

SPED Evaluations - Percent of Referrals that Result in Evaluations

SPED Evaluations - Percent of Evaluations that Result in Eligibility

SPED Evaluations - Percent of Referrals of ELLs that Result in Evaluations

SPED Evaluations - Percent of Evaluations of ELLs that Result in Eligibility

SPED Evaluations - Average Cost per Initial Evaluation

SPED Evaluations - Cost of Initial Evaluations per New IEP

SPED Reevaluations Cost as Percent of SPED Budget

SPED Reevaluations - Average Cost per SPED Reevaluation

IEP Meetings - Average Cost for IEP Meetings as Percent of SPED Budget

IEP Meetings - Average Cost per IEP Meeting

SPED Litigation and Due Process

Total Litigation/Due Process Costs as Percent of SPED Budget

Litigation/Due Process Administration Costs as Percent of SPED Budget

Litigation/Due Process Awards, Concessions & Settlements Costs as Percent of SPED Budget

STRATEGIC SUPPORT TEAMS

IMPROVING SPECIAL EDUCATION SERVICES IN THE BUFFALO PUBLIC SCHOOLS

Report

of the

Council of the Great City Schools

Strategic Support Team

Submitted to the **Buffalo Public Schools**



May 2014

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ACKNOWLEDGEMENTS

The Council of the Great City Schools thanks the many individuals who contributed to this review of special education programs in the Buffalo Public Schools (BPS). Their efforts were critical to our ability to present the district with the best possible proposals for improving special education and related services in the school system.

First, we thank Dr. Pamela C. Brown, the school district's superintendent. It is not easy to ask one's colleagues for the kind of review conducted by the Council's teams. It takes courage and openness and a real desire for change and improvement.

Second, we thank the BPS school board, who approved having this review done. We hope this report meets your expectations and will help improve special education services across the school system.

Third, we thank the staff members of the school district, particularly Mary Pauly, assistant superintendent of curriculum, assessment and leadership development, who, along with Kim Curtin and Donna Jackson, organized the team's interviews. Most people have no idea how much time is required to organize a review such as this, much less the time to conduct it and write up the draft and final reports. The details are numerous and time-consuming.

Fourth, the Council thanks the parents and advocates with whom we met. They work passionately to support children with disabilities and ensure the district serves these students in the best possible manner.

Fifth, the Council thanks Ebony Lofton, the director of specially designed instruction in the Chicago Public Schools, and Will Gordillo, the director of exceptional student education in the Palm Beach County School District, for their contributions to this review. We also thank their school systems for allowing them to participate in this project. The enthusiasm and generosity of these individuals and their districts serve as further examples of how the nation's urban public school systems are banding together to help each other improve performance for all students.

Finally, I thank Jeff Simering, the Council's director of legislative services, who facilitated the work of the team during its on-site visit; Julie Halbert, the Council's legislative counsel, who coordinated all other aspects of the team's work; and Sue Gamm, a nationally known expert in special education and long-time consultant to the Council, who worked diligently with Ms. Halbert to prepare the final report. Their work was outstanding, as always, and critical to the success of this effort. Thank you.

Michael Casserly Executive Director Council of the Great City Schools

CHAPTER 1. OVERVIEW AND BACKGROUND

The Buffalo Public Schools (BPS) is the second largest school district in New York, educating about 34,000 students in 58 schools (45 elementary and 11 high schools), including two schools that provide adult education services. Some 51 percent of the district's students are African American, 21 percent are white, 17 percent are Hispanic, seven percent are Asian American, three percent are multiracial, and the remaining students are Native American.

Of all students for whom BPS provides support, about 16.6 percent receive special education services. This percentage includes students residing in Buffalo who attend charter schools and private/parochial schools, and students that BPS places in agency schools. If one excludes preschool students and students placed by their parents into private/parochial schools, the disability rate is 15.9 percent for BPS/agency schools and 15.4 percent for charter schools.

In July 2012, following a nationwide search by the district, the Board of Education selected Dr. Pamela C. Brown as superintendent of the Buffalo Public Schools. The district's vision to provide a world-class education for every child is supported by its mission to:

- Ensure that every student will have the confidence, knowledge, thinking skills, character, and hope to assume responsibility for her/his life and contribute to the lives of others;
- Champion excellence and innovative learning experiences in partnership with family and community; and
- Hold itself accountable for educating its students and for working to energize all members of the community to actively participate in the accomplishment of the mission.

As reported on BPS's website, district successes in the 2012-13 school year included:

- An overall graduation rate that climbed more than 8 percentage points;
- Attendance rate that increased 1.5 percentage points;
- Chronic absenteeism that decreased by more than 6 percentage points;
- Short term suspensions that decreased by nearly 1,500;
- A dropout rate that declined by 7 percentage points;
- Eleventh grade Regents grades that were up 4.5 percentage points in math and nearly 3 percentage points in English language arts (ELA); and
- School growth scores that rose: 42 schools were rated Effective and two were rated Highly Effective.²

The district faces multiple challenges, including the state's designation that almost half (28) of its 58 schools are priority schools and an additional 16 schools are focus schools. Other challenges include implementing the rigorous Common Core State Standards (CCSS); enabling all students—including those with disabilities—to attain these high standards; meeting special

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¹ This incidence rate includes all students with disabilities, including preschool children in BPS, agency schools, and charter schools. Source: OSA, February 19, 2014, Infinite Campus.

² http://www.buffaloschools.org/spotlight.cfm?sp=175&school=0

education assessment obligations for the 8,000 students in 17 charter schools, including 1,000 students with IEPs; and administrating special education/related services effectively and efficiently.

In addition to examining these challenges in BPS, the Council's team was asked to address the district's high special education eligibility rate, the effectiveness of its integrated coteaching model, and the district's internal organizational and staffing model for special education personnel.

CHAPTER 2. PURPOSE AND ORIGIN OF THE PROJECT

Buffalo Public Schools Superintendent Dr. Pamela C. Brown asked the Council of the Great City Schools to review the district's services for students with disabilities and to provide recommendations that would improve those services and narrow the achievement gap between students with disabilities and their nondisabled peers. It was clear that the superintendent wants to ensure that the school system is providing optimum special education services to students with disabilities as the district is facing significant fiscal challenges. This report was designed to help BPS improve outcomes for students with disabilities and build capacity to educate all students effectively and efficiently.

The Work of the Strategic Support Team

To conduct its work, the Council assembled a team of experts who have successfully administered and operated special education programs in other major urban school districts around the country. These individuals also have firsthand expertise in the Individuals with Disabilities Education Act (IDEA) and are well versed in best practices in the administration and operation of special education programming.

To begin the Council's work, Julie Wright Halbert, the organization's legislative counsel, completed an initial visit to the school district December 9 through 11, 2013 that included interviews with district staff members and a meeting with parents. The Council's Strategic Support Team (the team) visited the district January 13-15, 2014 and analyzed the district's organizational structure, its processes for determining student eligibility for special education services (including the use of interventions and supports), its configuration of related services and instructional strategies, and other features of the district's programming for students with disabilities. The team briefed the superintendent at the end of its site visit and presented its preliminary findings and proposals.

In general, the Strategic Support Team pursued its charge by conducting interviews and focus groups with district staff members, reviewing numerous documents and reports, analyzing data, and developing initial recommendations and proposals before finalizing this report.

This approach of providing technical assistance to urban school districts by using senior managers from other urban school systems across the nation is unique to the Council and its members. The organization finds it to be effective for a number of reasons.

First, it allows the superintendent and staff members to work with a diverse set of talented, successful practitioners from around the country. The teams comprise a pool of expertise that superintendents and staff may call on for advice in implementing the recommendations, meeting new challenges, and developing alternative solutions.

Second, the recommendations from urban school peers have power because the individuals who developed them have faced many of the same challenges encountered by the district requesting the review. No one can say that these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions.

Third, using senior urban school managers from other urban school communities is faster and less expensive than retaining large management consulting firms that may have little to no programmatic experience. The learning curve is rapid, and it would be difficult for any school system to buy on the open market the level of expertise offered by these teams.

Members of the Strategic Support Team for this project included the following individuals –

Sue Gamm, Esq. Former Chief Specialized Services Officer Chicago Public Schools	Will Gordillo Director, Exceptional Student Education Palm Beach County School District
Ebony Lofton Director, Specially Designed Instruction Office of Diverse Learners and Supports Chicago Public Schools	Julie Wright Halbert, Esq. Legislative Counsel Council of the Great City Schools
Jeff Simering Director, Legislative Services Council of the Great City Schools	

Methodology and Organization of Findings

The findings in this report are based on multiple sources, including documents provided by BPS and other sources; electronic student data provided by BPS; group and individual interviews; email documents; and legal sources, including federal and state requirements and guidance documents. BPS staff members, parents, and other individuals who were interviewed for this report are documented separately to protect their privacy and are not quoted for attribution in this document. BPS position titles are referenced only when necessary so the reader can understand the source of procedures and other directives.

Chapter 3 of this report presents the Strategic Support Team's findings and recommendations. These observations and proposals are divided into four categories:

- 1. Special Education Demographics and Referral/Classification for Services
- 2. General Education Interventions and Supports
- 3. Teaching and Learning for Students with IEPs
- 4. Support for Teaching and Learning for Students with IEPs

Each category contains a summary of relevant information, along with findings that outline areas of strength, opportunities for improvement, and recommendations. Chapter 4 lists all recommendations for easy reference and provides a matrix showing various components or features of the recommendations. Finally, Chapter 5 presents a brief synopsis of the report and the team's overarching impressions. The appendices, which are provided at the end of the report, include the following information:

- Appendix A contains a proposed organizational chart for special education operations.
- Appendix B compares incidence rates and staffing ratios in 59 city school systems across the country.

Improving Special Education Services in the Buffalo Public Schools

- Appendix C lists documents reviewed by the team.
- Appendix D lists individuals the team interviewed individually or in groups and also contains the team's working agenda.
- Appendix E presents brief biographical sketches of team members.
- Appendix F presents a brief description of the Council of the Great City Schools and a list of the Strategic Support Teams that the Council has fielded over the last 15 years.

CHAPTER 3. FINDINGS AND RECOMMENDATIONS

This chapter presents the findings of the Council of the Great City Schools' Strategic Support Team (the team) and its recommendations for improving special education services in the Buffalo Public Schools.

I. Special Education Demographics and Referral/Classification for Services

The information below summarizes various demographic characteristics of BPS students with disabilities, including those who are English language learners (ELLs).³ When available, these BPS data are compared to students at the state and national levels, and with other surveyed urban school districts across the country. In addition, data are analyzed by primary disability areas and by race/ethnicity so the reader can fully understand the context in which BPS services are provided.

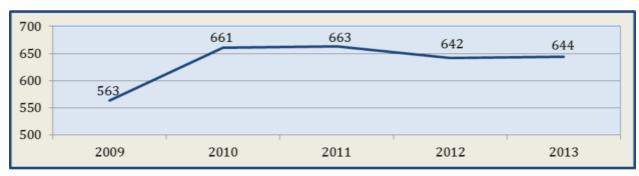
District Incidence Rates for Students with IEPs

The district's incidence rates for students with IEPs vary from year to year among both preschool and school-aged students.

Preschool Students with IEPs

As shown in Exhibit 1a, the number of preschool students with IEPs increased from 563 students in 2009 to 663 students in 2011 before decreasing to 644 students in 2013.

Exhibit 1a. Number of Preschool Students with IEPs (2008-2013)⁴



The preschool data reflects the number of students based on an October 2nd snapshot, and the number grows significantly each year by the end of the school year. Nearly as many new students (652) were referred as of January 2014 as had been referred in the entire 2012-13 school year (659)

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³ Students with disabilities who have individualized education programs (IEPs) and receive special education services are also referred to as students with IEPs.

⁴ Sources: BPS Report to SED - Special Education Snapshot provided by BPS to the Council team.

School-aged Students with IEPs

The number of all school-aged students with IEPs served by BPS decreased by 1,861 students between October 2005 (9,423) and 2013 (7,562). During this period, the disability rate ranged from a high of 20.4 percent (2006) to a low of 16.1 percent (2011), increasing slightly to 16.5 percent in 2013. These data include students in BPS, charter, agency, and nonpublic schools.

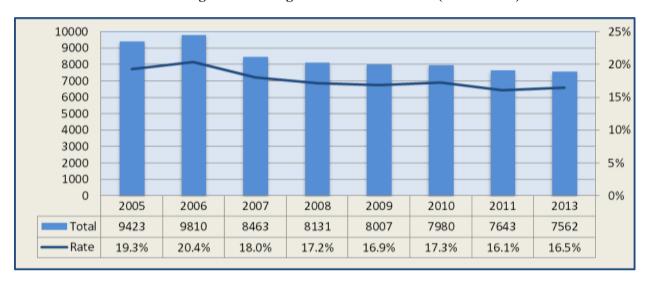


Exhibit 1b. Number/Percentage of School-aged Students with IEPS (2005 – 2013)⁵

Disability Rate for Students Attending BPS Schools

The data provided by the district for school-aged students educated in BPS schools in 2013 showed a disability rate of 14.6 percent (5,232 of 35,788 students). The 16.5 percent figure shown in Exhibit 1b contains all students with IEPs who are educated in BPS schools in addition to those residing in Buffalo who attend charter schools and private/parochial schools and whom BPS places in agency schools. Excluding preschool students and students placed by their parents in private/parochial schools, the disability rate is 15.9 percent for BPS/agency schools and 15.4 percent for charter schools.

However, the disability rate for students educated in BPS was significantly different from other data that district personnel submitted to the Council team. The report, *BPS Priority Schools Identification Data*, for instance, reported a disability rate of 18.7 percent (6,290 of 33,605 students).

BPS Primary Disability Rates Compared to State and Nation

Exhibit 1c shows the percentages of BPS students with IEPs by disability area and compares them to state and national data. These counts include those in BPS regular, charter nonpublic, and agency schools. The following abbreviations are used in the exhibit: learning

⁵ NYSED Special Education School District Data Profile for Buffalo City School District, NYSED By Enrollment, Classification Rate and School District School-Age Student Reports at http://www.p12.nysed.gov/sedcar/goal2data.htm#2011. Data for 2012 was not available. Data for 2013 provided by BPS: OSA, 2/19/14, Infinite Campus Enrollment of school-age children.

⁶ OSA, 2/19/14, Infinite Campus Enrollment of school-age children.

disability (LD), other health impaired (OHI), speech/language (S/L), emotional disturbance (ED), multiple disabilities (MD), and intellectual disability (ID). As one can see, BPS's rates are higher than state and national averages in the following areas: OHI (20 percent, compared to 15 and 13 percent, respectively) and ED (13 percent, compared to 7 and 6 percent, respectively). BPS rates are lower than state and national rates in the areas of LD (34 percent, compared to 39 and 41 percent, respectively), autism (4 percent, compared to 6 and 7 percent, respectively), and other (1 percent, compared to 2 and 7 percent).

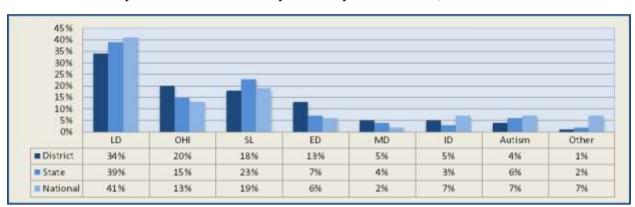


Exhibit 1c. Rates by Most Common Primary Disability Area for BPS, State and Nation⁷

BPS Primary Disability Rates over Time

Between October 2009 and October 2013, most disability rates among specific disabilities (ED, MD, ID, and other) remained stable, i.e., between 1 and 2 percentage points. The rates increased in the areas of OHI and autism (from 2 percent to 4 percent), and the rates decreased in the areas of LD (from 37 percent to 34 percent), and speech/language (from 22 percent to 18 percent). (See Exhibit 1d.)



Exhibit 1d. BPS Rates by Most Common Primary Disability Area⁸

⁷ Sources: BPS Report to SED - Special Education Snapshot provided by BPS to the Council team; State Data - NYSED Information and Reporting Services SEDCAR Data Summaries: Number of New York State Children and Youth with Disabilities Receiving Special Education Programs Services at

http://www.p12.nysed.gov/sedcar/state.htmNational Data - and USDE TA and D Network Part B Child count 2011-12 Historical State-Level IDEA Data Files at http://tadnet.public.tadnet.org/pages/712

⁸ BPS data source same as above.

Rates by Primary Disability Area and Race/Ethnicity

Exhibit 1e shows BPS's three major race/ethnicity groups (African American, Caucasian [white] and Hispanic) and their overall percentages of students enrolled in BPS schools by major disability areas monitored by the U.S. Department of Education and the New York State Education Department (NYSED) under its state performance plan (SPP).

The following disparities are notable: African American students have higher rates in the following disability areas, compared with their 51 percent share of the district's total student enrollment: ED (67 percent) and ID (60 percent). On the other hand, African American students have a notably lower rate in the area of autism (40 percent). White students—with a 21 percent share of the district's enrollment—have a higher rate of autism (35 percent). The variances were less disparate among Hispanic students.

60% 40% 20% 0% All BPS LD OHI ID ED Autism S/L Students African American 51% 67% 40% 57% 52% 45% 60% White 17% 21% 13% 35% 27% 28% 21% 19% Hispanic 17% 17% 22% 18% 21% 15%

Exhibit 1e. By Race/Ethnicity, Percentage of All BPS Students and Students with IEPs by Disability

Selected Risk Ratios

Along with state requirements involving "n" sizes, NYSED measures disproportionate representation and significant disproportionality in the identification of students with disabilities. A relative risk ratio or weighted-relative risk ratio for any race/ethnic group that is 4.0 or higher, or that is 0.25 or lower is considered disproportionate. Using this NYSED standard, BPS does not have any disparity.

However, other states use risk ratios of 2 or higher or 0.5 or lower to define disproportionality to determine when to trigger a review of district policies, procedures, and practices. Using this more common standard, concerns would be raised over the risk ratios of 1.93 for African American students in the areas of ED and 2.0 for white students in the area of autism. In addition, the low risk ratio of 0.34 among African American students in the area of speech/language would raise concern (see Exhibit 1f).

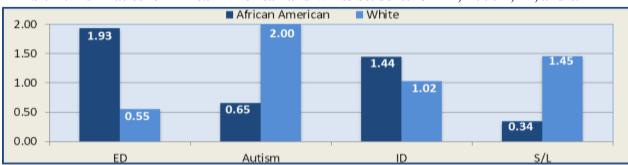


Exhibit 1f. Risk Ratios for African American and White Students for ED, Autism, ID, and S/L

Students with IEPs by School Level and Accountability Category

The Council's team also compared disability rates by grade level and school status for all students with IEPs, and for all students with disabilities in the areas of LD, OHI and ED. These areas were selected because students with these disabilities are most likely to remain in their home school for instruction and most are likely to participate in regular statewide assessments. While students with a primary disability of S/L also participate in regular assessments, they typically require less intensive instructional support.

Overall Rates by Grade Level

Exhibit 1g shows overall rates among all students with IEPs and students with LD, OHI and ED by grade span and school status. These data indicate that schools in good standing had LD, OHI, and ED rates that were lower than priority/focus schools, especially at the secondary level and at secondary schools with elementary-grade levels. Overall rates among students with IEPs had no particular pattern by school status.

- Elementary Schools. Focus schools had a higher rate of students with IEPs (21 percent) than did priority schools or schools in good standing (18 percent). In the areas of LD, OHI and ED, schools in good standing had a lower rate of students with IEPs (53 percent) than did priority or focus schools (63 percent).¹⁰
- Secondary Schools with Elementary Grades. Both priority and focus schools had higher rates of students with IEPs (17 percent) than did schools in good standing (14 percent). In the areas of LD, OHI and ED, focus schools (89 percent) and priority schools (85 percent) had higher rates than schools in good standing (63 percent).
- Secondary Schools. Schools in good standing (19 percent) and priority schools (18 percent) had higher rates of students with IEPs than focus schools (14%). However, in the areas of LD, OHI, and ED, focus schools and priority schools had much higher rates (95 percent and 90 percent respectively) than did schools in good standing (74 percent).

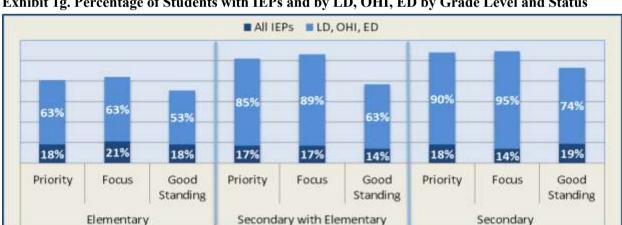


Exhibit 1g. Percentage of Students with IEPs and by LD, OHI, ED by Grade Level and Status

⁹ School 84, which is in good standing, was not included in this analysis because it enrolls primarily students with IEPs (84 percent) and no students who are LD, OHI, or ED, and its inclusion would skew the elementary school

¹⁰ LD, OHI, and ED rates reflect the percentage of students with these disabilities compared to all students with IEPs.

LD, OHI, and ED Rates by School, Grade Levels, and Status

Exhibit 1g above shows overall rates of students with IEPs and students with LD, OHI, and ED by school at each grade span and improvement-status category. These data indicate the considerable variation among schools at all grade levels and at each status category. Exhibits 1h, 1i, and 1j below show additional detail at each grade span.

• Elementary Schools

- Priority Schools. Overall IEP rates had a range of 14 percentage points (25 to 11 percent).
 Rates of LD, OHI, and ED had a range of 55 points (83 to 28 percent).
- *Focus Schools*. Overall IEP rates had a range of 10 percentage points (25 to 15 percent). Rates of LD, OHI, and ED had a range of 56 points (76 to 20 percent).
- *Good Standing*. Overall IEP rates had a range of 20 percentage points (31 to 11 percent). Rates of LD, OHI, and ED had a range of 33 points (65 to 32 percent).

Exhibit 1h. Elementary Grades

• Secondary Schools with Elementary Grades.

- *Priority School.* The district's single priority school had an overall IEP rate of 17 percent and an LD, OHI, and ED rate of 85 percent.
- *Focus Schools*. Overall IEP rates had a range of 5 percentage points (20 to 15 percent). Rates of LD, OHI, and ED had a range of 13 points (98 to 85 percent).
- Good Standing. Overall IEP rates had a range of 7 percentage points (17 to 10 percent).
 Rates of LD, OHI, and ED had a range of 62 points (92 to 30 percent).

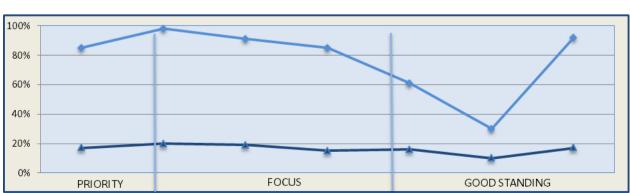
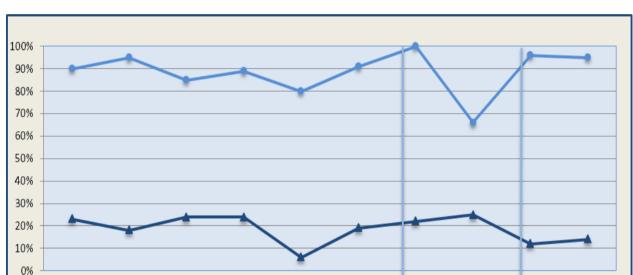


Exhibit 1i. Secondary Schools with Elementary Grades

- Secondary Schools. Three of the six priority schools and both focus schools had overall IEP rates ranging from 23 to 25 percent. In LD, OHI, and ED categories, four priority schools had rates between 89 and 95 percent, a focus school had a 100 percent rate; and schools in good standing had rates of 95 and 96 percent.
 - *Priority Schools*. Overall IEP rates had a range of 18 percentage points (6 to 24 percent). Rates of LD, OHI, and ED had a range of 15 points (80 to 95 percent).
 - *Focus Schools*. Overall IEP rates had a range of only 3 percentage points (22 to 25 percent). Rates of LD, OHI, and ED had a range of 34 points (66 to 100 percent).
 - *Good Standing*. Overall IEP rates had a range of only 1 percentage point (96 to 95 percent). Rates of LD, OHI, and ED had a range of 2 points (12 to 14 percent).



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Exhibit 1j. Secondary Schools

English Language Learners with Disabilities

In this subsection, various data are summarized on ELLs with disabilities.

PRIORITY

Students with Disabilities by ELL/Not ELL

BPS has 4,278 English language learners, accounting for 12.7 percent of the total student population. Some 15.8 percent of the district's English language learners have IEPs. Exhibit 1k shows the rates of students with one of the six major disabilities disaggregated by ELL and non-ELL status. These data show that the rates for ED, ID, and S/L are comparable across both language groups (ELL and non-ELL).

However, there is more variation in the areas of autism (3 percent ELL, 1 percent non-ELL), ED (9 percent ELL, 6 percent non-ELL), LD (34 percent ELL, 41 percent non-ELL), and OHI (23 percent ELL, 15 percent, non-ELL).¹¹

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¹¹ Data for this and the next exhibit were provided by BPS and do not include students in charter and nonpublic schools.

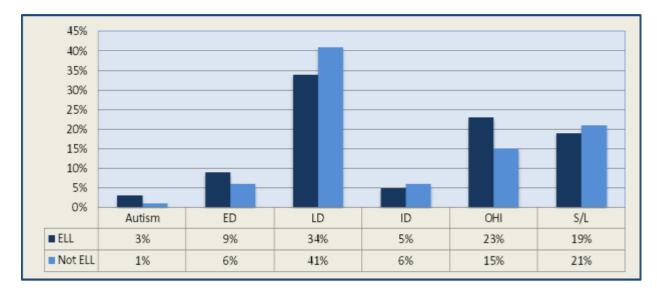


Exhibit 1k. Percentage of Students with Major Disabilities by ELL/Not ELL Status

Percentage of District ELL/Not ELL Students by Disability

When looking at rates among ELL and non-ELL students with IEPs by their primary disability areas, one can see that the disparities between the two language categories are somewhat different from disability to disability. The rates are comparable in the areas of LD, ID, and S/L but more disparate in the areas of autism, ED, and OHI. (See Exhibit 11.)

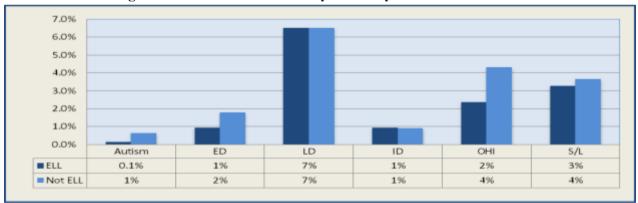


Exhibit 11. Percentage of ELL/Not ELL Students by Disability Areas

Comparison of Hispanic/Not Hispanic ELL Students With/Without IEPs

The disparities become even more marked when comparing ELLs who are Hispanic and those who are not Hispanic. As illustrated in Exhibit 1m, although 35 percent of all ELLs are Hispanic, 73 percent of ELLs with IEPs are Hispanic.

Conversely, 65 percent of ELLs are not Hispanic but only 27 percent of ELLs who have IEPs are not Hispanic. Using a risk ratio metric, Hispanic ELLs are 5.2 times more likely than non-Hispanic ELLs to have an IEP.

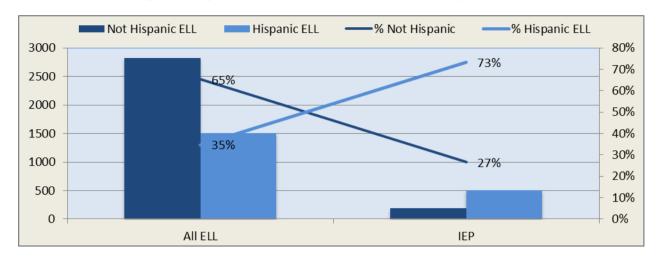


Exhibit 1m. Non-Hispanic/Hispanic ELLs by No IEP and IEP Subcategories

It is worth noting that the district's data collection system for initial referrals does not differentiate between students who are initially referred to the CSE without previous special education service from those who are referred with a previous IEP from an out-of-state school district. For example, two schools had 52 Spanish-speaking students entering this school year from Puerto Rico with an IEP. Although there is some thinking in the district that the data could be skewed based on the large number of students transferring from Puerto Rico with an IEP—and possibly other Spanish speaking countries—there is little reason to think that the risk ratio would be skewed.

Focus group participants indicated that there was an ELL checklist that guided the evaluation and eligibility-determination process, but interviewees did not know whether use of the checklist was monitored in any way.

Referrals for Special Education Evaluations

One of the Council team's data requests related to the number of students referred for an initial evaluation, evaluated, and found to have a disability. Additional data were provided on the timeliness of completing initial evaluations, reevaluations and annual reviews. This section summarizes findings from these data.

Preschool Students

Data on referrals for new preschool students for special education evaluation show that 654 students have been referred in the current school year, as of January 2014—nearly as many as were referred during the entire 2012-2013 school year (659).

School-Age Students

The Council team was informed that many referrals this school year have been initiated by parents who believe their children are frustrated with the new Common Core State Standards and presume their children cannot be successful. There were also concerns that an increasing number of referrals may be related to the new teacher evaluation process.

¹² Personnel are working to include this type of data in the future.

Individuals interviewed also reported that the student support team (SST) process requires a significant amount of time and paperwork in order to support a special education evaluation referral and that there were not sufficient general education interventions available to students who do not qualify for services.

In 2012-13, 1,048 students were referred for a special education evaluation. This number was 163 more students than in the previous school year. At the time these data were shared with the Council team, 40 evaluations from the 2012-13 school year were still pending. Based on evaluations completed in both school years, students were classified at the same rate (73 percent), although a few more students (87) were classified in 2012-13 than in the prior school year. About the same numbers of referrals were withdrawn in both years (28 in 2011-12 and 23 in 2012-13). (See Exhibit 1n.) Of the students referred for a special education evaluation, the percentage of students classified is about the same as in many other school districts reviewed by members of the Council team.

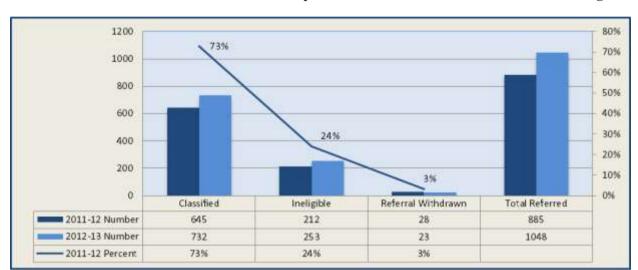


Exhibit 1n. Number of Students Referred for Special Education Evaluations and Numbers Eligible

Comparison of School-Aged Students with IEPs by Initial Eligibility Rates and by Overall Disability Rates

The 2012-13 rates of students with IEPs by primary disability area are comparable to the rates of students initially found eligible in the prior school year in the areas of ID, LD, and S/L (see Exhibit 1o). The rates decreased for autism between 2011-12 and 2012-13 (2 percent to 1 percent), and ED (17 percent to 15 percent), but increased for OHI (21 percent to 24 percent).

The 2012-13 rates were similar to the district's overall rates in the areas of LD but were higher in ED and OHI. The higher S/L rate may be due to the evaluation of young children who were predominantly classified in this area. Lower classification rates were found in the areas of ID and autism, which with a 4 percent rate, was lower than the state and national rates of 6 and 7 percent, respectively.

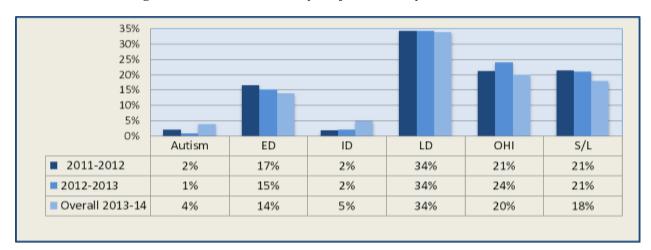


Exhibit 10. Percentage of Students Classified by Major Disability Areas and Overall 2013-14 Rates

Timely Initial Evaluations, Reevaluations, and Annual Reviews

District personnel provided the following information about the timeliness of initial evaluations, reevaluations, and annual reviews for preschool and school-aged evaluations.

Preschool Initial Evaluations

Between July 1, 2013 and February 24, 2014, BPS received 497 consents for preschool special education referrals. ¹³ Of these referrals, about half (54 percent) of the children have had meetings to review their evaluation results. Data were not provided to report their timely completion. Of the remaining children (229), 111 (48 percent) of the evaluations were not late at the time the data were submitted to the Council team.

According to district personnel, about 65 to 75 percent of late cases were because parents' evaluators of choice completed the evaluations late or without sufficient time to schedule a timely meeting. 14 BPS's staff members believed that these evaluations might be late because parents did not make their children available in a timely manner. It was reported that "[t]he remaining 25 to 35 percent are late because of [the] sheer volume this time of year."

School-aged Evaluations

For the 2013-14 school year, the district provided data showing the number of evaluations (initial and reevaluations) and annual reviews that were overdue as of January 22. District personnel had to investigate reasons for these delays because the data showing the reasons why they were overdue were not readily available or presumed to be correct.

Initial Evaluations. Some 65 initial evaluation meetings were not completed in a timely manner. Of these meetings, 33 were for monolingual students and they were completed within one or two weeks of their due dates. Of the 32 remaining students, meetings for seven bilingual students have been completed and those for one monolingual and 24 bilingual students remain. Reasons for delays, including snow days, were provided for six students.

¹³ An additional six consents for evaluations were withdrawn after they were submitted.

¹⁴ Under New York State regulations, preschool children are evaluated by private agencies chosen by parents.

- Reevaluations. Of the reported 156 untimely reevaluations, BPS personnel found ultimately that 23 were timely. The 133 late reevaluations were completed by 34 district schools and by BPS personnel on behalf of agencies, charter schools, and nonpublic placements. Most schools had one or two reevaluations that were late, while 25 BPS schools completed all reevaluations in a timely manner. BPS personnel are investigating why 94 of the late reevaluations were not completed as of February 19. According to district representatives, most noncompliance is related to bilingual assessments.
- Annual Reviews. Of 49 untimely meetings, 13 were not completed and 21 (most for nonpublic placements) were not yet completed when this report was prepared. Three of these meetings were delayed because of snow days and one was postponed due to a parent's request. An additional 15 students transferred to BPS from other districts, including many from other states and Puerto Rico, which were already out of compliance. Pursuant to state rules, students from out-of-state are treated as initial evaluations.

English Language Learners

Concerns were also expressed about the timeliness of special education evaluations for ELLs, since there were only three bilingual psychologists who could handle evaluation backlogs for these students.

Students Exiting from Special Education

Between 2010-11 and 2012-13, the number of students declassified from special education in order to receive only general education services (including those for whom parents revoked consent) increased from 268 to 316. Typically, the largest increase involved students with a primary disability of speech/language—increasing from 202 (2011-12) to 263 (2012-13). The number of students exiting with other primary disabilities remained fairly constant over the period. (See Exhibit 1p.)

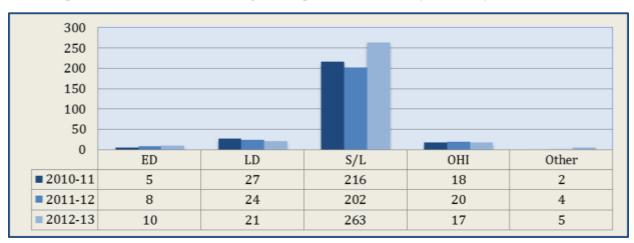


Exhibit 1p. Number of Students Exiting from Special Education by Disability Area

Distinguished Educator Directions

The November 2013 "Action Plan Status Update" contained comments submitted by Distinguished Educators that showed specific deliverables in the review and analysis of students receiving special education services and special education referrals, and exiting priority schools

(Item 7.1). The district reported that it was developing a new monitoring strategy for the SST process similar to a learning walk, and it will provide specific "look-fors and feedback." It was not clear to the Council team how a monitoring strategy like a learning walk would be useful without accompanying data and analysis, including rates of progress among students receiving differing kinds of interventions.

AREAS OF STRENGTH

Areas of strengths in BPS's program related to student classification for special education services are summarized below.

- *CSE Process Decentralized.* Several years ago, the committees on special education (CSE) process was decentralized and is managed by each school.
- **Special Education Number/Rates.** Based on one set of data, the number and percentage of students classified as having a disability decreased between 2005 and 2013.
- *Racial/Ethnic Disparities*. The New York State's special education department found no disparity in BPS's special education rates for students by race/ethnicity, nor did it find that the district used inappropriate policies, procedures, or practices.
- Classified Rates. Of students referred for a special education evaluation, the percentage
 classified approximates those seen in many other school districts reviewed by the members
 of the Council team.

OPPORTUNITIES FOR IMPROVEMENT

Major opportunities for improvement in BPS's special education program in this area are summarized below. Additional opportunities are provided in the next section related to General Education Interventions and Support.

- Special Education Number/Rates. Although the number and percentage of students classified as having a disability have decreased, they are projected by staff to increase this year. The rates increased in the areas of OHI and autism, and decreased in the areas of LD and speech/language. The district's rates are higher than state and national rates in the areas of OHI and ED, but lower in the areas of LD and autism.
- *BPS School Disability Rate*. Two data reports showed significantly different rates of schoolaged students with IEPs enrolled in BPS schools: 16.5 percent (Infinite Campus report) versus 18.7 percent (BPS Priority Schools Identification Data report). The finding suggests that data are not uniformly coordinated, collected, or reported.
- Racial/Ethnic Disparities. African American students are 1.93 times more likely than other
 racial/ethnic groups to be classified with ED, and white students are twice as likely to be
 classified as having autism. African American students are only 0.34 times as likely as other
 students to be classified with a speech/language impairment and are underrepresented in this
 area.
- *ELLs.* Overall, 15.8 percent of all ELLs have IEPs. ELLs account for 12.7 percent of all BPS students. Using a risk ratio metric, Hispanic ELLs are 5.2 times more likely than non-Hispanic ELLs to have an IEP. While there appears to be an ELL checklist to guide the evaluation and eligibility-determination process, its use is not monitored in any obvious

manner. There are clear needs for additional training to differentiate a student's disability issues from his or her English language acquisition issues. In addition, there are clear needs for additional bilingual psychologists and CSE chairpersons to address the growing population of ELLs, and there are needs for additional language-relevant translators to work with students and parents.

- Referrals. In 2012-13, 1,048 students were referred for special education evaluations, an increase of 163 more students over 2011-12. Staff perceived that the growth was related to implementation of the more rigorous Common Core State Standards and the new teacher evaluation process. BPS staff also believed that the higher rates were being driven by increasing numbers of students with IEPs returning to BPS from charter schools, but staff members were unable to produce any data to support this perception. In addition, the increase in the number of referrals is especially significant for preschoolers. By January 2014, 654 had been classified as having a disability—almost as many as the 659 that had been identified in the entire 2013-14 school year. Finally, a particular challenge involves the number of evaluations completed in a timely manner. However, NYSED regulations require that these evaluations be given by outside providers chosen by parents, so much of this process is out of the district's control.
- Evaluations/Annual Review Timeliness. BPS does not appear to have on-time access to data showing the status and timeliness rates of students being evaluated or ready for annual reviews, including data on the reasons for delays or recalculating school-calendar days when schools are closed for snow days. When these data are not readily available, it is more difficult to administer and oversee assessments and meetings for their timeliness, or to analyze patterns that might raise other concerns.
- Addressing Referrals. The Distinguished Educator's November 2013 "Action Plan Status Update" presents specific deliverables for the review and analysis of the percentage of students receiving special education services and special education referrals, and their exit rates in priority schools. The district reported that it was developing a new monitoring strategy for the SST process similar to a learning walk, and it will provide specific "look-fors and feedback." It is not self-evident how such a monitoring strategy, without data on student progress using differing interventions, could support appropriate referrals for special education evaluations.

RECOMMENDATIONS

- 1. Improve consistency, appropriateness, and timeliness of eligibility determinations across the district and ensure that staff members are held accountable for doing so.
 - a. CSE and SST Chairperson Roles. Establish specific procedures that separate the CSE and SST processes and delineate separate chairpersons for each, along with standards for each role and responsibility. For each role, develop a staff allocation formula that takes into account the time required for the chairperson function. To the extent fiscally feasible, either reduce caseloads or provide stipends to ensure that each chairperson has the time available for this purpose and for other responsibilities. For the SST chairperson's formula, consider responsibilities based on the number of students without disabilities who do not meet state standards. Also, evaluate/analyze where the assignment of staff

¹⁵ This formula should replace the SST allocation provided to the Council's team that based allocation on students with disabilities.

- members, particularly school psychologists, is necessary at each school to manage the SST process, and whether there are any options for reducing staff. (More information about the SST/CSE process is provided in the following section: II. General Education Intervention and Supports.)
- b. Standards and Documentation. Develop clear and user-friendly standards for the review of referrals for special education evaluations, clear criteria for determining qualification for services, and worksheets for documenting evaluation results and facilitating the application of criteria.
- c. English Language Learners. Ensure that the standards, criteria, and worksheets designed to meet Recommendation 1b are appropriate for ELLs and take into account various national origins and cultures. Have special education and multilingual education personnel collaborate on this activity. Involve other department personnel as necessary to review current translation services for children and their parents to identify gaps and determine follow-up action.
- d. Early Childhood. The significant increase in early childhood referrals this year has significant implications for the future. With a collaborative group of knowledgeable BPS/community individuals, determine the reasons for the increase, and determine follow-up steps to ensure a thorough screening process, appropriate eligibility decisions, and any need to increase BPS services. With the Council of New York Special Education Administrators (CNYSEA) or other colleagues, determine the efficacy of the current system for evaluating preschool children, and establish whether the more common national approach of district-provided assessments and placements—with appropriate state funding—might be preferable.
- e. Data Analysis. Review data currently available to the district and revise them as necessary in order to track referral and qualification rates by disability and to identify any patterns of concern, e.g., disparate rates for referrals, qualifications by disability areas, and related services (by race/ethnicity, grades, schools). Ensure that data collection includes dates for determining timeliness, and to allow instructional days to be modified when schools are closed for snow days.
- f. Disparity Measures. Develop metrics, indicators, and standards for determining eligibility disparities, especially when small numbers are involved. Collaborate with BPS personnel knowledgeable on research and statistics or discuss with Council staff.
- g. Data Reports. With a collaborative group of central office and school-based staff, identify the reports needed to identify patterns referenced in Recommendation 1e and to determine timely initial evaluations, reevaluations, and annual reviews—and begin implementing them.
- h. Monitoring. Monitor CSE practices against the standards/expectations developed. Use a monitoring process that engages school-based staff members so that they are aware of the issues/problems identified and have a better understanding of the need for follow-up action.
- i. Differentiated Training. Provide mandatory differentiated professional development to all SST and CSE staff members and principals on the standards/expectations, data reporting, monitoring process, new CSE/SST processes, and chairperson roles and responsibilities.

j.	Accountability. Establish an accountability process, including personnel evaluations and monitoring, for implementing the standards/expectations and procedures/practices described above. Implement the process after appropriate training and support are provided.

II. General Education Intervention and Supports

Under NYSED regulations, written referrals for special education evaluations are to include a description of "intervention services, programs or instructional methodologies used to remediate the student's performance prior to referral...or state the reasons why no such attempts were made." ¹⁶ Consistent with this requirement, the district's Board of Education in 2002 established policy 7617, which requires BPS to "establish a plan for implementing schoolwide approaches and pre-referral interventions in order to remediate a student's performance prior to referral for special education." BPS has adopted a response to intervention (RtI) and positive behavior intervention and supports (PBIS) approach to providing interventions within the general education setting that will furnish proactive "strategies to meet the broad range of student needs and to improve student performance."¹⁷

Overview of the District's RTI and PBIS Frameworks

According to a PowerPoint document on the district's RtI webpage, RtI "is a system used to screen, assess, identify, plan for, and provide interventions to students at risk of school failure." The webpage further explains that the effective implementation of RtI is consistent with the implementation of Common Core State Standards and provides students with scaffolding and supports to better access a rigorous curriculum. The implementation of a comprehensive RtI process is intended to contribute to:

- More meaningful identification of learning and behavioral problems,
- Improved instructional quality,
- Providing the best opportunity for all students to succeed in school, and
- Identifying learning disabilities and other disabilities. ¹⁹

The district has been implementing PBIS since the 2005-06 school year in cooperation with Erie 1 BOCES and an outside consultant. The district's PBIS webpage presents program goals to:

- Increase data-based decision-making on behavior and academic instruction and reinforce across all school settings,
- Increase consistent use and effect of research-based behavioral and academic instructional strategies among all school staff at schoolwide, classroom, and individual student levels,
- Reduce use of reactive discipline measures in schools (e.g., office discipline referrals, detentions, suspensions, expulsions) for all students,
- Increase academic achievement levels of all students,
- Implement effective intervention plans for students with the most comprehensive behavioral and emotional needs in order to support and evaluate their success across home, school, and community settings,

¹⁶ Part 200.4(a)(2)(iii)(b)

¹⁷ Policy 7617 at http://www.buffaloschools.org/district.cfm?subpage=98465

¹⁸ http://www.buffaloschools.org/curriculum.cfm?subpage=84358

¹⁹ National Center on Response to Intervention, http://www.rti4success.org/whatisrti

- Increase capacity of general education settings to successfully educate students with disabilities and prevent academic and/or social failures of all students,
- Increase capacity of schools and districts to address over- and under-representation of students by ethnicity relative to discipline, disability status, and academic achievement with access to data on these outcomes, and
- Improve attendance by establishing a culture of attendance, acknowledging outstanding attendance and supporting students at-risk for chronic absenteeism. ²⁰

According to the webpage, BPS has developed PBIS systems (e.g., processes, routines, working structures, and administrative supports) to ensure attainment of valued outcomes, research-validated practices, and data-based decision making. The webpage also provides various resources describing the three tiers of increasingly intensive interventions and support, along with training materials.

Leadership and Support Structure

A director of special education and a representative of the curriculum, assessment, and instruction unit have co-chaired the district's RtI team. The team includes representatives of all content curricular areas and multilingual education.

Student Support Teams

Student support teams (SST) implement the RtI and PBIS processes with a team that includes a social worker, a psychologist, a counselor, and a clerk. Currently, the SST carries out the functions of the CSE process. According to a November 22, 2013 memorandum from the CSE special education director to principals, the priorities of the SST are to:

- Maintain CSE compliance, including initial referrals, reevaluations, amendments and manifestation-determinations along with related time lines for each process.
- Serve as an intervention team that provides students with crisis intervention, guidance conferences, and behavioral supports at the secondary and tertiary level.

There was concern that this function—with one chairperson for both processes—sometimes emphasizes the CSE process and reduces access to SST meetings that would provide supports to teachers and students on academic and behavior interventions and problem solving. According to the Distinguished Educator's November 22, 2013 "Action Plan Status Update," the district's "[n]ot having fully operational SSTs in every building for the purpose of intervention and support may be lending itself to higher referrals to special education simply due to lack of a problem-solving forum." In addition, the 2012 Cross and Joftus Systems Review report stated, "Student support team staff described their responsibilities as staffing school-based committees on special education (CSE)." And during focus group meetings held by the Council team, it was reported that SST referrals usually result in referrals for a special education evaluation. Reportedly, plans are in place to separate the SST and CSE chairperson functions, with psychologists chairing the SSTs, which are anticipated to become multi-tiered system support teams.

²² Page 44.

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²⁰ http://www.buffaloschools.org/EducationalServices.cfm?subpage=57659

²¹ Page 33.

Instructional Coaches

BPS has redesigned the literacy and math coach positions into a single new instructional coach position. Every school has at least one coach, and several coaches are also assigned from the central office. Their involvement is intended to support access to and use of data to guide instruction. Coaches who served in the prior positions were required to reapply for the newly defined positions.

In addition, under the direction of the chiefs of school leadership, new data coaches are responsible for activities that include the following:

- Assisting classroom teachers with the review of formative, summative, and state assessment data.
- Consulting/mentoring classroom teachers to utilize data to inform instructional decisions.
- Assisting with data team planning and working with a research aide to organize, implement, and oversee data required for assigned schools.
- Participating in and providing professional development opportunities for teachers and administrators in the use of data in the classroom.
- Providing annual, monthly, or weekly reports for teachers and grade-level/common planning time meetings.

Under the district's agreement with the union, coaches are unable to work with teachers unless invited by teachers into their classes—a major concern.

Also, there was a perception among staff that coaches may not be adding much value to general/special educators who are co-teaching or to teachers in self-contained classes.

Use of Data for Screening, Monitoring Progress, and Problem Solving

The information in this section, which is relevant to data use for universal screening, student progress monitoring, and problem solving, was either provided by district personnel or found on the district's website.

Universal Screening and Progress Monitoring

The following tools are being used for universal screening and progress monitoring, according to those interviewed:

- *C.I.R.C.L.E.* The Center for Improving the Readiness of Children for Learning and Education (C.I.R.C.L.E.) progress-monitoring tool is used three times each year to measure early literacy skills for pre-kindergarteners.
- **DIBELS.** Dynamic Indicators of Basic Early Literacy Skills Next (DIBELS) is used for students in kindergarten through sixth grade to assess letter-naming fluency, phonemesegmentation fluency, initial-sound fluency, nonsense-word fluency, and oral-reading fluency to help monitor students' acquisition of early literacy skills.²³

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²³ http://www.buffaloschools.org/EnglishDept.cfm?subpage=47262.

- IDEL. Indicadores Dinámicos del Éxito en la Lectura (IDEL) is used. It is similar to DIBELS but takes into account the structure of the Spanish language for students in kindergarten through third grade.
- mCLASS Math. The mCLASS Math includes screening and progress-monitoring measures for students in kindergarten through third grades. According to the district's website, the process is not mandated but is "highly recommended."²⁴

Focus group participants reported that all schools conduct their progress-monitoring of student performance differently, and that some schools use the above tools in addition to end-ofunit tests. Common formative assessments (CFAs) are being written through the district's "Illuminate" system for end-of-quarter benchmarking. Interviewees expressed concerns that there was not a common understanding of the use and purpose of the CFAs, e.g., informing instruction, use for accountability, etc.

In the area of behavior, it was reported that SSTs complete tier-2 forms to document how many students are in the tier and are responding to interventions. There were concerns that the district has not taken steps to ensure that data are collected in a systemic manner for progress monitoring or electronically to facilitate analysis.

These reports were similar to findings from the Cross and Joftus Systems Review, which found "[s]creening, evaluation, and progress monitoring tools are not used consistently and are sometimes unavailable to educators working with ELLs. 25

Problem Solving

The problem-solving process is used to (1) analyze student difficulties, (2) develop plans and monitoring progress, (3) evaluate student instruction/intervention, and (4) modify instructional/intervention approaches as needed. The application of a data-based problem solving and decision-making cycle in and across all three tiers of instruction is considered to be a critical component of this problem-solving process and is integral to the success of RtI.²⁶

Neither the district's website or district representatives nor the focus group participants provided any evidence that a regular, defined problem-solving system was being used as part of the RtI process to address students' academic challenges. The district's website on PBIS includes information about problem solving to address behavioral issues. But the only written information about problem solving was in the district's CSE Guide, which included a section on the multidisciplinary team/problem-solving team. However, the document does not describe the problem-solving process in any detail, and few people interviewed could describe how it was being used.²⁷

²⁷ Ibid. at pages 11 and 12.

²⁴ http://www.buffaloschools.org/MathDept.cfm?subpage=50098.

²⁵ Page 5.

²⁶ "Common Core State Standards and Diverse Urban Students: Using Multi-Tiered Systems of Support," the Council of the Great City Schools at www.cgcs.org/domain/87.

Data Dashboard

BPS has a new data dashboard system with a variety of data, including information relevant to students receiving special education services. The district has put a priority on providing professional development on data-based decision making and using data to inform instruction. Turnkey training, along with instructional videos, are being provided to district staff to support the use of data-driven inquiry, a strategy that has been reinforced through ongoing discussions with principals. Reportedly, these discussions include some references to special education, and district staff indicated that there was a desire for these discussions to be more structured and focused.

Academic/Behavior Instruction and Interventions

The district has webpages that address RtI for both academics²⁸ and positive behavior.²⁹ The webpage for positive behavior is more fully developed than is the webpage for academics. According to the Cross and Joftus report, "Positive Behavioral Interventions and Supports model has been introduced across the district with some success, but many more academic and behavioral interventions are needed." Focus group participants reinforced this finding and added that, although academic and behavioral interventions are generally available for students in kindergarten through sixth grade, teachers struggle to find interventions at the middle and high school levels. Overall, staff members were concerned that the district has not ensured that students in every school have access to a menu of evidence-based interventions for various academic and behavior needs at increasing levels of intensity or that the district has a comprehensive list of all interventions being used in every school.

Academics

The following information emerged from focus group discussions and is related to academic instruction and interventions.

- Core Curriculum and Differentiation. The district uses the Journeys ELA curriculum for all elementary schools and another program for Spanish-speaking students who are English learner. There is no common set of math books used throughout the district. Reportedly, teachers struggle to differentiate instruction in general education classes for diverse learners.
- *Interventions and Special Education Referrals*. Generally, students are supposed to receive about three months of general education interventions, which are intended to be monitored by SSTs, before they are referred to a special education evaluation. There were concerns, however, that such interventions are sometimes not initiated until after a referral is initiated.
- Types of Interventions and Progress Monitoring. The use of an ELA block is designed to accommodate interventions, which the district has organized into an "XYZ Literacy pathway" for first through sixth grades. The pathway identifies students requiring various levels of support. Specific interventions used include Corrective Reading, Reading Mastery, and Fountas and Pinnell. There were concerns, however, that increasingly intensive interventions are not implemented with fidelity. Further, none of these interventions include

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²⁸ http://www.buffaloschools.org/curriculum.cfm?subpage=84358

²⁹ http://www.buffaloschools.org/EducationalServices.cfm?subpage=57659

³⁰ Page 5.

the use of a multi-sensory approach to reading. Reportedly, teachers rely on math teachers to suggest interventions for students. At the high school level, there are more resources to support ELA than math. The district does not have a comprehensive list of all interventions used by schools. Further, there is no evidence that student progress is monitored in a way that would help assess the fidelity of implementation. Finally, the Council team saw no evidence that these interventions were being implemented in a way that would further instruction under the new Common Core State Standards.

- *Consistency of Use.* Reportedly, teachers do not have sufficient access to instructional interventions for students who are not progressing as expected.
 - Various staff members interviewed reported that there was a significant need for interventions that were more intense and frequent.
 - Although training has been provided, interventions were not being implemented consistently across the district for students with and without IEPs. Reportedly, this inconsistency was related to the state's encouragement and the district's intent that schools be given some degree of autonomy.

Behavior Interventions and Support

According to the district's PBIS webpage, BPS has been implementing the research-based positive behavior interventions and support since the 2005-2006 school year. This framework has been implemented in cooperation with Erie 1 BOCES and a consultant. The webpage indicates that systems have been developed for such areas as processes, routines, working structures, and administrative supports needed to consider outcomes, research-validated practices, and data-based decision making.

For the 2013-14 school year, the district developed a new code of conduct based on the PBIS framework and incorporated restorative justice principles as well. The code, "Developing Safe and Supportive Schools, Standards for Community-wide Conduct and Intervention Supports," along with the district's webpage, describe the district's RtI Behavior Model as having the following components.

- *Tier 1 Universal Interventions*. Universal Systems include schoolwide programs that foster proactive safe, healthy, and supportive learning environments and promote social and emotional learning along with developing a connection among school, home and community. A school-based team "drives the implementation of RtI Behavior for the school building." The team is composed of a building administrator, behavior specialists (counselor, social worker, and psychologist), a special educator, general education teachers from various grade levels, support staff, and nondistrict individuals (parent representative, community representative, and student representative in upper grades). High school teams receive training from nationally recognized consultants.
- *Tier 2 Secondary Interventions*. These interventions use a comprehensive developmental approach focusing on skills development, increasing protective conditions for students and families, and preventing risk factors or early on-set problems from progressing. The interventions include check-in and check-out (CICO), social/academic instructional groups, individualized CICO, groups and mentoring along with brief functional-behavior assessments (FBA) and behavior-intervention plans (BIP). These interventions are supported by

³¹ http://www.buffaloschools.org/files/57596/Official%20Code%20of%20Conduct%207.1.13.pdf

secondary-systems teams that employ data on student responses to interventions and create additional strategies as needed.

- *Tier 3 Tertiary Interventions*. These supports are designed for individual students who are identified as having severe, chronic, or pervasive concerns. The interventions include complex FBA/BIPs and wraparound services. According to focus group participants, there has been some use of Say Yes to Education community supports as part of the district's tier 3 supports. In addition, several full-service health clinics are in schools that provide additional support.
- *Student Support Team*. SSTs work with principals, teachers, nurses, mental-health clinicians and external agency representatives to address student behavioral needs. According to focus-group participants, the SST manages the first two tiers of intervention.

Focus group participants reported that PBIS is not implemented fully with fidelity at every school. Training for PBIS does not take into account staff mobility, and there are individuals who have attended numerous training sessions and have received the same information repeatedly. Training is not customized to meet the needs or skills of school personnel, and there is no opportunity for training on social/emotional issues, e.g., support for grief counseling, traumatic stress, etc.

Suspension Data

Data provided by BPS indicated that the numbers of students suspended for six days or less and for more than six days decreased significantly during the period that started with the beginning of the school year through the end of January from 2011-12, 2012-13, to 2013-14 (see Exhibit 2a) In the following section, Teaching and Learning, suspension rates for students with and without disabilities are presented.



Exhibit 2a. Numbers of Students Suspended for 1-6 Days and More than 6 Days over Time

Although the district's initiatives have been effective at reducing suspensions overall, focus group participants reported that implementation is problematic at schools without strong principal leadership to encourage and reinforce teacher support. Reportedly, some students are "constructively suspended" (but not formally suspended) when their parents are told that their children cannot return to school until a parent attends a school conference.

English Language Learners

Focus group participants expressed the following concerns about the use of interventions with ELLs and their referrals for special education.

- Access to Evidence-Based Interventions. There are insufficient interventions available for ELLs at various levels of intensity, and sometimes English as a Second Language (ESL) is considered incorrectly to be an intervention.
- **Process and Training.** Interviewees were unaware of any consistent SST process for determining whether a student's lack of achievement was related to language acquisition, access to appropriate interventions, or the presence of a disability. SSTs and CSEs have not received adequate training to address these issues.

Multi-tiered System of Supports

According to BPS staff, a district team is developing a framework of multi-tiered systems of supports (MTSS) with the assistance of an outside consultant, who has been supporting the district's PBIS efforts. The following information was reported to the Council team.

- *District MTSS Team.* The district's MTSS leadership team includes individuals knowledgeable about academics and the support of positive behavior. The team meets regularly to integrate academic and behavior processes.
- Framework and Implementation. The MTSS team is approaching the work as a general education process and a mechanism for ensuring that referrals for special education evaluations are appropriate. The team is working on an implementation plan, addressing professional development, articulating how many schools will roll out the plan, and receiving feedback from chiefs who have not been involved in the development of the MTSS framework.
- *Execution*. It is anticipated that implementation will begin at the beginning of the 2014-15 school year and that professional development will be provided to build staff capacity. The goal is that, during the first two years of implementation, the model will be operationalized with examples of best practices, and monitoring support will be provided to improve implementation.

Although the Council team was informed that the initiative is in the planning stages, the Distinguished Educator's November 2013 "Action Plan Status Update" included a district statement that the framework had been completed and was presented to Division Heads in December; and that roll out was to begin in January beginning with the priority schools.³² The Distinguished Educator document indicates that the MTSS plan needs significant discussion, collaboration, ownership, and involvement from individuals who supervise principals and who have not participated in planning.

In addition, the Distinguished Educator indicates that the MTSS framework needs to include all district efforts, e.g., CCSS, PBIS, suspension, attendance, ELLs, special education, etc. The Distinguished Educator identified next steps, including asset/resource mapping, the development of a professional development plan, the articulation of curriculum, the

³² Page 26.

identification of cohort schools, and the layout of what, when, and how work will begin, along with an indication of who leads the work and who will monitor and evaluate it.

A BPS staff member informed the Council's team that the district's MTSS leadership team had completed the MTSS roll out plan. However, it had not yet been approved by the curriculum, assessment, and instruction chief. Although the Council requested it, the organization's team was not provided a copy of the proposed MTSS framework or any related documents. Because the team was not provided the documentation it needed to make a determination, it could not tell whether the MTSS planning process includes funding to support the purchase of necessary interventions, training for them, or an evaluation component.

AREAS OF STRENGTH

Areas of strengths related to BPS's implementation of general education interventions and supports for student academic and positive behavior needs are summarized below.

- MTSS Framework Development. BPS is using a consultant to develop a districtwide framework for MTSS. The district is developing a two-year rollout plan to merge support for academic and behavior needs, building on its stronger PBIS initiative that has been in place since 2005-06.
- Coaches. BPS has redesigned the literacy and math coach positions into one new instructional coach position. Every school has at least one coach, and several are also at the central office. Their involvement is intended to support access to and use of data to guide instruction.
- **Reading Curriculum.** There is a districtwide reading curriculum in place along with a common formative assessment that is given three times each year for benchmarking purposes.
- Access to Data. The district has developed a data dashboard that uses benchmark data and is capable of showing student movement between tiers of intervention and has the potential to show student growth. Each school has gone through cohort training to use the Data-Driven Instruction (DDI) process. Central office and school coaches are involved in intensive weekly training to build their knowledge and skills in the area of data support.
- **Reading Interventions.** There are some specific district-sponsored reading interventions available for students in elementary school grades, such as Reading Mastery, Fountas and Pinnell Leveled Literacy, Language!, etc. District staff members reported that resources are being developed for schools to support monitoring and interventions.
- *PBIS Webpage*. The district's PBIS webpage provides many resources for guiding the process. The website states that systems have been developed for such areas as processes, routines, working structures, and administrative supports needed to produce outcomes, research best practices, and use data-based decision-making.
- New Code of Conduct and Suspensions. For the 2013-14 school year, the district developed a new code of conduct based on the PBIS framework and incorporated restorative justice principles. Data provided by BPS indicated that the numbers of students suspended for six days or less and more than six days decreased significantly from the beginning of the school year through the end of January from 2011-12, 2012-13, to 2013-14.

• *Health Services*. Nurses are in every school, and several schools have health centers through partnerships with health agencies that provide social workers who offer mental health services.

OPPORTUNITIES FOR IMPROVEMENT

The following summarizes major opportunities for improvement.

- *RtI Leadership.* Currently, the district's RtI initiative is co-led by special education and curriculum directors. The high-level visibility of special education leadership may reinforce the perception that the framework is primarily a pipeline to special education. For example, the Council team was concerned—after hearing reports from some focus group participants—that interventions are not implemented until a student is being considered for a special education evaluation, and that interventions are used in a way that supports special education referrals.
- MTSS Framework Development. There is contradictory information about the status of the district's development and implementation of its MTSS framework. In addition, it does not appear that school leadership chiefs have been involved in planning activities, and it is not clear that funding will be available to purchase necessary interventions, support training, or implement an evaluation component.
- SST and CSE Chairpersons. Currently, chairpersons for SSTs and CSEs are the same people. This has resulted in less time allocated to the SST process than for the CSE process. The Council team was informed that next school year, the SST and CSE chairperson roles would be separated and that different personnel would serve in each role. Because the chairpersons and CSE teams report to principals, there was concern that without additional accountability by principals, there may be undue pressure on CSE teams to classify students and place them in more restrictive placements.
- *Coaches*. Coaches should be invited into teacher classrooms to assist, yet some teachers resist doing so even when there may be a need for coaching. There was a perception by some interviewees that coaches are not providing enough assistance to general/special education co-teachers and to special education teachers in self-contained settings.
- **Progress Monitoring.** There are no uniform standards or practices for monitoring student progress, and the delivery of academic and behavioral interventions to support short-term student growth is uneven. There is no universal understanding of the purpose and use of the district's formative assessments, e.g., informing instruction, use for accountability, etc. There were concerns that the district has not taken steps to ensure that data are collected in a systemic manner to document specific interventions and student progress on them, and no electronic mechanism is in place to facilitate analysis.
- **Problem Solving.** No information from the district's website, district staff members, or focus group participants was provided on the use of a problem-solving process as part of the RtI process to address academic issues.
- *Differentiated Instruction*. Teachers reported that they are struggling to differentiate instruction for diverse learners in general education classes.
- Academic Interventions. The district does not have a comprehensive list of all interventions used by schools. Interventions vary by school, there are fewer available interventions in the

upper grades, and there is inadequate access to instructional interventions for students who are not progressing as expected. None of the district's interventions include the use of a multi-sensory approach to reading. Very few resources are available for ELLs. And interventions have not been assessed for their compatibility with the Common Core State Standards.

- **PBIS Implementation.** PBIS is not implemented with fidelity at every school or at any tier of intervention. Training for PBIS does not take into account staff mobility or skill, and there are individuals who have attended numerous training sessions and have received the same information repeatedly. Training is not customized to meet the needs of school personnel, and there is no opportunity for training on social/emotional issues. Although the district's initiatives in this area have been effective at reducing suspensions overall, implementation has been hindered at schools without strong principal leadership to encourage and reinforce teacher support. Reportedly, some students are "constructively" (but not formally) suspended when their parents are told that their children cannot return to school until the parent attends a school conference.
- *Professional Development.* The turnkey model used for professional development loses its integrity when newly trained personnel turn around and train others.

RECOMMENDATIONS

- 2. Ensure that BPS's framework for a multi-tiered system of supports and related activities is evidence based and implemented with fidelity.
 - a. Leadership. To reinforce the notion that the MTSS process is based in general education practices (but can also be accessed by students with IEPs, ELLs, and gifted students), have the initiative visibly led by the curriculum, assessment, and instruction chief and proactively supported by district leadership and administrative personnel at all levels.
 - b. Framework and Implementation Plan Feedback. Ensure the framework and implementation plan include feedback from school-leadership chiefs, knowledgeable principals, school-based personnel from different grade level schools, and parent representatives (including at least one from each group).
 - c. Web-based Description of MTSS Expectations. Use a web-based format to post a uniform set of standards and expectations for the implementation of MTSS. If necessary, phase in these standards and expectations, beginning with more general information and proceeding to more specific information as it becomes available.
 - 1) Core Curriculum Expectations and Differentiated Instruction. Core curriculum expectations and use of universal design for learning (UDL)³³ are critical to program

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Through differentiated instruction, teachers instruct students of differing abilities to maximize each student's growth and individual success by meeting each student where (s)he is and assisting in the learning process. To differentiate instruction, one must recognize students' varying background knowledge, readiness, language, preferences in learning, and interests and react responsively. Through a Universal Design for Learning (UDL) approach, curriculum is initially designed with the needs of all students in mind, so that methods, materials, and assessment are usable by all. Traditional curricula present a host of barriers that limit students' access to information and learning where printed text, in particular, is especially problematic for students without a well-developed ability to see, decode, attend to, or comprehend printed text. A UDL-designed curriculum is innately flexible and enriched with multiple media, so that alternatives can be accessed whenever appropriate. UDL takes on the burden of adaptation so the teacher and/or student does not have to, thereby minimizing barriers and maximizing access to both information and learning.

success. UDL is based on strategies that enable curricula to be accessed easily by students with different abilities and needs. It can be well integrated into everyday instructional practices and includes multiple methods of presenting information using media and other methods of engaging students' interest and assessing what students have learned. At a minimum, the district should establish standards for the use of differentiated instruction.

- 2) *Universal Screening/Progress Monitoring*. Universal screening and progress-monitoring tools appropriate for elementary, middle, and high schools should be implemented districtwide. Establish decision rules for student access to tier 2 and 3 interventions, and the basis for determining sufficient progress in each tier.
- 3) **Problem Solving.** Parameters should be put in place for SST problem solving relevant to student academic and behavioral needs as described in evidence-based literature.
- 4) Interventions. Increasingly intensive research-based academic/behavior interventions should be made available short and long term, along with expectations for their support and usage. Map current resources and assess gaps between student needs and research-based interventions in use. Establish a phase-in plan for procuring interventions that will provide a comprehensive menu of options, including multisensory reading interventions,
- 5) Scheduling and Use of Personnel. Models should be developed for scheduling and using the broadest range of trained intervention providers.
- 6) Special Education Evaluation Referrals. Guidance should be provided for determining how much progress a student should be making when provided with appropriate research-based interventions and initiating a referral to special education services when that progress is not evident even after providing targeted interventions. Also, include guidance for dealing with students' lack of progress when interventions are not targeted or implemented properly.
- 7) *Training*. Expectations should be developed for providing and requiring staff participation in MTSS professional development.
- 8) Parental Involvement and access to information should be provided.
- d. Exemplary MTSS Implementation Models. Based on student outcomes, identify and share models of exemplary practice with MTSS, including examples involving students with IEPs, ELLs, and twice-exceptional students. Enable staff to visit exemplary schools inside and outside the district.
- e. Differentiated Training. Identify the critical information that various staff members need about MTSS, including instruction aligned with Common Core State Standards, and develop a comprehensive and differentiated professional development program that covers the following:
 - 1) *Professional Learning Standards*. Training based on national professional learning standards, such as Learning Forward's Standards for Professional Learning.³⁴

³⁴ http://www.learningforward.org/standards#.UMvVD7Yt0kU

- 2) *Multiple Formats*. Multiple formats (e.g., videos, webinars, PowerPoint, narrative text, etc.) and presentation models (e.g., school-based, small groups, etc.) that are differentiated and based on current levels of staff knowledge and skills
- 3) Cross-Functional Teams. Cross-functional teams comprised of individuals who directly support schools in order to provide primary training to the broadest spectrum of administrative staff, teachers on assignment, and instructional staff. Build their capacity to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
- 4) High Quality Trainers. Trainers who are knowledgeable and effective. Identify exemplary internal staff in addition to external trainers.
- 5) Access to and Usage of Training. Provide professional development to all staff members who need it and ensure that it is differentiated by staff experience and skills. Evaluate its effectiveness on student outcomes. Consider mandating training and providing a certificate of demonstrated performance.
- 6) **BPS Website.** Post all training materials on BPS's website.
- f. Evaluation of Effectiveness. Evaluate the effectiveness of MTSS implementation through such activities as the following:
 - 1) Baseline Data. Establish baseline data on current instructional practices and outcomes. Use the report from the Office of Shared Accountability on elementary schools, which supplied student achievement data by special education service model, to produce a comparable report for high schools.
 - 2) Data and Reports. With a collaborative group of central office and school-based staff, identify what data are needed to produce electronic, user-friendly reports on the use of academic and behavioral interventions and their results for individual students. Aggregate and summarize the data by subgroups and combinations of groups, e.g., schools, grades, excused/unexcused absences, suspensions, etc. (for students with IEPs, ELLs, IEPs/ELLs, etc.). Plan follow-up activities on any additional data and reports that are not easily produced or in cases where the data are not easily accessible.
 - 3) Walk-Throughs. In addition to the production and use of data reports referenced in Recommendation 2f(2) that can be used to monitor the effectiveness of MTSS, modify the district's walk-through protocols and checklists in a way that will reflect best practices and measure the extent to which school practices are consistent with the standards and expectations set by the district. Initiate technical assistance, professional development, coaching, and mentoring as necessary to improve practices and implement the walk-throughs effectively.
- g. Timely Communication and Feedback. Establish a process for providing timely feedback to the MTSS leadership team on implementation barriers, and problem-solve solutions—particularly when they are beyond local school control or when schools require assistance to resolve problems.

III. Teaching and Learning for Students with IEPs

In states like New York that have adopted the Common Core State Standards (CCSS), local school districts are expected to implement new rigorous grade-level expectations for instruction in English language arts (ELA) and math. These standards identify the knowledge and skills students need to be successful in college and/or careers. A fundamental goal of the CCSS is the promotion of a culture of high expectations for all students. In a statement on the application of the common core to students with disabilities, the CCSS initiative website includes a statement that reinforces its inclusionary intent:

Students with disabilities ... must be challenged to excel within the general curriculum and be prepared for success in their post-school lives, including college and/or careers." These common standards provide historic opportunity to improve access to rigorous academic content standards for students with disabilities.³⁵

The statement underscores the supports and accommodations students with disabilities need to meet high academic standards and to fully demonstrate their conceptual and procedural knowledge and skills in ELA (reading, writing, speaking and listening) and mathematics. These supports and accommodations should ensure that students have full access to varying ways of learning and multiple opportunities to demonstrate knowledge while retaining the rigor and high expectations of the standards. These expectations for implementation of the CCSS with students with disabilities include the following elements:

- *Instruction and related services* designed to meet the unique needs of students with disabilities and to enable them to access the general education curriculum,
- *IEP annual goals* aligned with and chosen to facilitate students' attainment of grade-level academic standards,
- *Teachers and specialized instructional support personnel* who are prepared and qualified to deliver high-quality, evidence-based, and individualized instruction and support services,
- *Instructional supports for learning* that are based on the principles of universal design for learning (UDL), which foster student engagement by presenting information in multiple ways and allowing for diverse avenues of action and expression, ³⁶ and
- *Instructional accommodations* that reflect changes in materials (e.g., assistive technology) or procedures that do not change or dilute the standards but allow students to learn within the CCSS framework.

The United States Department of Education (USDOE) has established a special education State Performance Plan (SPP) with requirements that include 20 indicators. Based on this plan, each state is required to develop annual targets and monitor school district performance on each

http://www.udlcenter.org/.

³⁵ http://www.corestandards.org/assets/application-to-students-with-disabilities.pdf

³⁶ UDL is defined as "a scientifically valid framework for guiding educational practice that (a) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and (b) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient." by Higher Education Opportunity Act (PL 110-135). See

indicator. Of the 20 indicators, 15 are applicable to school districts and the remaining five are applicable to states. Of the 15 district indicators, six are considered to be "compliance" oriented: suspension/expulsion, racial/ethnic disproportionality for special education overall and for six disability areas, timely evaluations, timely preschool services, and transition services. The remaining indicators are considered to be "performance" oriented, e.g., high school graduation, high school dropout, statewide assessment performance, etc. States are required to make an annual "compliance" determination for each district and take enforcement action, if necessary, based on specified IDEA provisions. Some states have chosen also to consider the performance indicators to be compliance in nature and they monitor districts accordingly.

In response to concerns that the heavy emphasis in state plans on compliance has narrowed district focus away from results for students with disabilities, the federal Office of Special Education Programs (OSEP) announced its intention to change its practice. Under a new proposal, OSEP will include test scores, graduation rates, and post-school outcomes as the basis of a new "Super-indicator" aligned with "Results-Driven Accountability." Although specific details are not yet available, OSEP's director has reported that the agency will use 2013-14 performance results as part of its assessment of state plans. Once the process is clarified, states will apply the federal model to school districts.

In the following sections, BPS's achievement data on early childhood and school-aged students with IEPs are analyzed. These achievement data are consistent with those that the U.S. Department of Education is considering. For young children, data are provided on SPP achievement outcomes; for school-aged students, data are provided on statewide assessments, graduation rates, and dropout rates. In addition, data are provided on the extent to which students with IEPs are educated in various educational settings. These data will take on additional federal importance as states move to implement OSEP's "Results-Driven Accountability" framework.

Early Childhood Special Education Achievement Outcomes

Private agencies provide special education services for BPS children. In some cases, multiple agencies provide related services to a single child, which makes coordination challenging. By March, April, and May, classes fill up and it is more difficult to find open seats.

Furthermore, the state's regulatory scheme makes it difficult for districts to provide direct special education services to children. For instance, School 84 (Health Care Center for Children at the Eerie County Medical Center) educates kindergarten through 12th grade medically fragile students with severe cognitive delays and physical challenges. To facilitate an easier transition from preschool to kindergarten, BPS sought approval from NYSED to have preschool classes located at the school. NYSED indicated, that because private agency placements were not full in the area, the district could not extend its services to these students and the agency denied School 84's request.

One of the indicators in NYSED's State Performance Plan pertains to the achievement of children three through five years of age in three areas: positive social/emotional skills; acquisition and use of knowledge and skills; and the use of appropriate behavior to meet their needs. In each of these three areas, data are calculated on the percentage of students showing substantial growth and functioning within age expectations. BPS rates for the six indicators range between 23 and 36 percentage points below state targets. Data from the NYSED special

³⁷ http://eservices.nysed.gov/sepubrep/mainservlet?f=report1112&school=140600010000&run=Go

education school district data profile report for the 2010-11 school year are shown below in Exhibit 3a.³⁸

Substantial Growth

For children entering early childhood programs below age expectations but who are substantially increasing their rate of growth by age six when they are exiting the program, the following data compare the percentages meeting the standard in 2011-12 to state target percentages for that year.

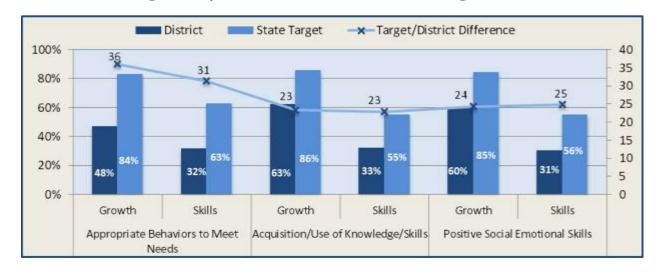
- **Positive Social/Emotional Skills.** 48 percent met standards, which was 36 percentage points below the target.
- Acquisition/Use of Knowledge/Skills. 63 percent met standards, which was 23 percentage points below the target.
- **Appropriate Behavior to Meet Needs.** 60 percent met standards, which was 25 percentage points below the target.

Functioning within Age Expectations

For children who are functioning within age expectations by six years of age or have attained those expectations by the time they exit the program, the following data compare the percentages meeting the standard in 2011-12 to state target percentages for that year.

- **Positive Social/Emotional Skills.** 32 percent met standards, which was 31 percentage points below the state's target.
- **Acquisition/Use of Knowledge/Skills.** 33 percent met standards, which was 23 percentage points below the state's target.
- **Appropriate Behavior to Meet Needs.** 31 percent met standards, which was 25 percentage points below the state's target.

Exhibit 3a. Percentage of Early Childhood Children with IEPs Meeting Performance Standards³⁹



³⁸ www.edresourcesohio.org/profile2012/ProfileDoc.php

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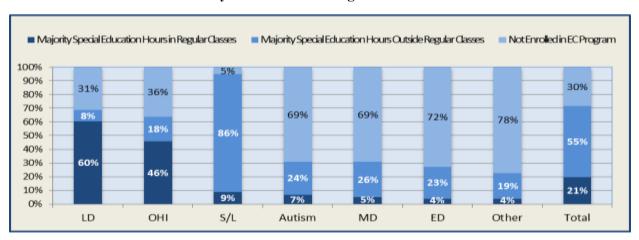
³⁹ NYSED School District Data Profile for Buffalo City School District 2011-12.

Educational Settings of Young Children

According to district data, 588 children from BPS and agency schools are included in the NYSED Student Information Repository System (SIRS) for Early School-Age (ESA) Settings. This information pertains to children who are attending a kindergarten, first grade, or other regular early childhood program for 10 or more hours a week and are receiving the majority of their hours of special education and related services in the regular early childhood program or some other location, or they are not enrolled in a regular early childhood program. In 2012-13, for all early childhood children with IEPs, 21 percent were educated in regular classes for the majority of the school day and 55 percent were educated outside of these classes; and 30 percent were not enrolled in regular early childhood classes. The proportions differ considerably depending on the student's primary disability. (See Exhibit 3b.)

- Majority of Special Education in Regular Classes. Students with a learning disability and other health impairment have the highest rates of being educated in general classes for most of the school day (60 and 46 percent, respectively). According to a district representative, while there is a preference for providing speech/language services in the general education classroom, scheduling is difficult for speech/language pathologists with large caseloads. Nine percent of students with speech/language impairments are educated in regular classes but receive their speech/language services in another location. Rates for the remaining disability areas educated in this setting range between 4 and 5 percent.
- Majority of Special Education Outside Regular Classes. Students classified with speech/language impairments have by far the highest rate (86 percent) for receiving services outside of regular classes. The remaining disability areas range between 8 and 26 percent. Some 99 percent of school-aged students with a speech/language disability are educated in general education settings at least 80 percent of the time. (See Exhibit 3g on page 45.)
- *Not Enrolled in Regular EC Program.* Students with an "other" disability, emotional disturbance, multiple disability and autism have the highest rates for education in an agency setting (ranging from 69 percent to 78 percent), and students with speech/language impairments have the lowest rate (5 percent). ⁴⁰

Exhibit 3b. Number of Students by Educational Setting⁴¹



⁴⁰ Other disabilities include vision impairments, hearing impairments, orthopedic impairments, and traumatic brain injuries.

⁴¹ Unless otherwise noted, the district provided noted data to the Council Team.

School-Aged Students Achievement

In the 2010-11 school year, the rates of students in grades 3 through 8 being educated in specified setting were affected by the Board of Regents' imposition of higher cut scores. ⁴² Also, the rates were affected by 2012-13 school year assessment changes that incorporated the Common Core Learning Standards. ⁴³

Rates from 2008-09 through 2012-13

Overall, test scores in 2012-13 for students with IEPs were very low. The percentage of elementary school students scoring at least proficient in ELA was 2.4 percent and in math was 3.2 percent (see Exhibit 3c.). At the high school level, only 8.5 percent were proficient in reading and 0.9 were proficient in math. This school year was the first year that the elementary-grade assessments measured the Common Core Learning Standards. The scores for elementary-grade students without IEPs were much lower than in prior school years, effectively reducing the achievement gap in ELA (11.8 points) and math (8.3 points) between students with/without IEPs. The gap in the high school grades was 30.4 points in reading and 5.8 points in math. Exhibit 3c and the narrative below summarize the data on students with IEPs in reading and math.

• ELA/Reading

- Grades 3-8. As a result of changes in cut scores and assessments, students with IEPs scored at or above proficient levels at rates that fell from 26.3 percent in 2008-09 to 9.5 percent in 2010-11 and then to 2.4 percent in 2012-13. The achievement gaps between students with IEPs and students without IEPs decreased from 37.2 percentage points in 2008-09 to 11.8 percentage points in 2012-13, again the result mostly of changes in the assessments.
- *Grades 9-12.* Although the rate of high school students scoring at or above the proficient level increased from 20.7 percent in 2009-10 to 30.9 percent in 2011-12, the rate fell dramatically to 8.6 percent in 2012-13. The achievement gap narrowed from 49.5 percentage points in 2009-10 to 30.4 percentage points in 2012-13.

Math

- Grades 3-8. Math proficiency rates, although higher than reading, also felt the effects of changes in cut scores and assessments. Students with IEPs scored at or above proficient levels at rates that fell from 42.7 percent in 2009-10 to 14.4 percent in 2010-11, and then to 3.2 percent in 2012-13. As with reading, the achievement gap in math between students with and without IEPs decreased from 29.3 percentage points in 2008-09 to 8.3 percentage points in 2012-13.
- Grades 9-12. Math proficient or above rates for secondary students with IEPs were far lower than either reading or math rates at the elementary-grade level. Very few students met/exceeded state standards in math at the high school level--only 0.1 percent did so in 2009-10 and 0.9 percent did so in 2012-13. The achievement gap between students with/without IEPs increased from 0.6 percentage points in 2009-10 to 5.8 percentage points in 2012-13, reflecting the very low performance levels of students with and without IEPs.

⁴² http://www.oms.nysed.gov/press/Regents Approve Scoring Changes.html

⁴³ http://www.oms.nysed.gov/press/grades-3-8-assessment-results-2013.html

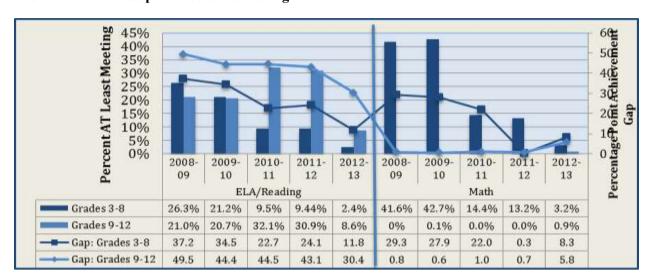
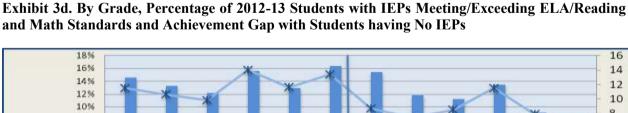


Exhibit 3c. Percent of Students with IEPs Meeting/Exceeding ELA/Reading and Math Standards and Achievement Gap with Students having No IEPs

Rates in 2012-13 by Elementary Grades

For elementary-grade students with IEPs in 2012-13, third graders had the highest rates at the proficient or above levels in both ELA (3.1 percent) and math (6.7 percent). Relatively low achievement gaps in reading and math (11.5 and 8.7 percentage points, respectively) reflected changes in the assessment and low overall performance among students with and without IEPs (see Exhibit 3d.).

- **ELA.** Students in third and eighth grades (3.1 and 3.0 percent, respectively) scored at the proficient or above levels at greater rates than students in other grades, whose rates ranged from 2.7 percent (fourth grade) to 1.4 percent (seventh grade). The achievement gap was highest among eighth graders (13.4 percentage points).
- **Math.** Some 6.7 percent of third graders scored at or above the proficient level in math—the highest performing grade--followed by fourth graders at 4.5 percent. The rates among the remaining grades ranged from 2.8 percent in fifth grade to 1.2 percent in seventh grade. The largest achievement gap between students with/without IEPs was 11.5 percentage points in sixth grade.



8 8% 6 6% 4 4% 2 2% 0 0% 3rd 4th 5th 6th 7th 8th 3rd 4th 5th 6th 7th 8th ELA Math 3.1% 2.7% 2.4% 1.6% 1.4% 3.0% 6.7% 4.5% 2.8% 2.0% 1.2% 2.2% 14.6% 13.3% 12.2% 13.0% 16.4% 15.4% 11.9% 11.3% 13.5% 9.1% NOIEP 15.6% 8.0% 14 11.6 13.4 8.7 7.4 11.5 7.9 5.8

Educational Environments

The 10-year-long National Longitudinal Transition Study-2 (NLTS 2) documented the characteristics, experiences, and outcomes of a nationally representative sample of more than 11,000 youth ages 13 through 16 who were receiving special education services in grades 7 and above in 2001. The study found that, while students with disabilities who spent more time in general education classrooms had lower grades than their nondisabled peers, those students (with disabilities) scored closer to grade level on standardized math and language tests than did students with disabilities who spent more time in separate settings.⁴⁴

For students with disabilities to improve their academic achievement and reduce achievement gaps, they need to have full access to the core curriculum and receive evidence-based interventions that are implemented with fidelity. With the increased rigor of the CCSS and the state assessments, the challenges to provide that access are greater than ever.

The State Performance Plan measures students educated in one of three educational settings and sets targets for each: (1) time in regular education settings of 80 percent or more of the day, (2) time in regular education seeing of less than 40 percent of the day, and (3) in separate schools.

The data below show these settings for BPS, charters schools, and agencies and by disability and grade.

Overall Rates for BPS, Charters and Agency Schools Compared to State Targets and National Rates

District students in BPS, agency, and charter schools together met the 53 percent target for educating students in regular classes at least 80 percent of the day but narrowly missed the 24 percent target for regular classes less than 40 percent of the day.

However, a substantially higher percentage of students (11 percent with charters and 12 percent without charters) are educated in separate schools than the SPP target of 7 percent or the national rate of 3 percent (see Exhibit 3e.)

- 80 Percent or More in Regular Education. 55 percent of district students are educated inclusively, compared with the national rate of 59 percent rate. Not counting charter schools, the BPS/agency rate is 52 percent, just below the SPP's 53 percent target.
- Less than 40 Percent in Regular Education. 20 percent of district students are educated in regular education classes for less than 40 percent of the time, compared with the national rate of 21 percent. Not counting charter schools, the BPS/agency rate is 22 percent, meeting the SPP's higher 24 percent target (the lower rate is better).
- *Separate Schools.* 11 percent of district students are educated in separate schools, compared with the national rate of 3 percent rate, and SPP's 7 percent target. Without charter schools, the district's rate is 12 percent.

⁴⁴ Review of Special Education in the Houston Independent School District, Thomas Hehir and Associates Boston, Massachusetts, page 25.

http://www.houstonisd.org/cms/lib2/TX01001591/Centricity/Domain/7946/HISD__Special_Education_Report_201_1_Final.pdf.

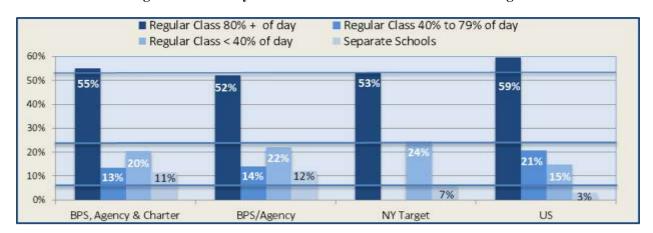


Exhibit 3e. Percentage of Students by Educational Environments and SPP Targets⁴⁵

Educational Environments by Grade Level

While the elementary grades have the highest rate (59 percent) for educating students with IEPs in regular classes for at least 80 percent of the day, the elementary grades also have the highest rate (27 percent) for educating these students outside the regular class for more than 60 percent of the day. The 17 percent high school rate is the highest in educating students in separate schools. (See Exhibit 3f.)

- 80 Percent or More in Regular Education. Students in grades one through five have the highest rate (59 percent) of educating students in general education classes at least 80 percent of the time. Middle and high school rates are 47 and 48 percent, respectively.
- Less than 40 Percent in Regular Education. Elementary students have the highest rate (27 percent) of self-contained classes (in general education less than 40 percent of the time), followed by middle and secondary-school students (20 and 10 percent, respectively).
- *Separate Schools*. High schools have the highest rate (17 percent) of educating students in separate schools, followed by middle and elementary school grades (12 and 10 percent, respectively).



Exhibit 3f. Educational Environment Rates by Grade Level for BPS/Agencies

⁴⁵ US rate source: Institute of Education Sciences, National Center for Educational Statistics, 2009-2010 Fast Facts at http://nces.ed.gov/fastfacts/display.asp?id=59.

Educational Environments by Most Prevalent Disabilities

BPS/agency students with speech/language, learning disabilities, and other health impairments have the highest rates for being educated in regular classes at least 80 percent of the time. Together, these students comprise 49 percent of the total. Students with emotional, intellectual, and multiple disabilities along with autism have the highest rates for separate classes and separate school placements, significantly exceeding national rates (see Exhibit 3g.).

- 80 Percent or More in Regular Education. Almost all students with speech/language impairments (99 percent) are educated inclusively, followed by students with learning disabilities (69 percent), and other health impairments (57 percent). The remaining disability areas range from 12 percent (emotional disturbance) to 6 percent (intellectual and multiple disabilities).
- Less than 40 Percent in Regular Education. For other students, the rates in separate classes are much higher than national rates: the intellectual disability rate (61 percent) exceeds the national rate by 13 points; the emotional disturbance rate (30 percent) is 12 points higher than the national rate; and the learning disability rate (14 percent) exceeds the nation's rate by 6 points.
- *Separate Schools*. The high rates of students in separate schools exceed national averages for students with the following disabilities: intellectual disabilities, 17 percent (9-point gap); emotional disturbance, 39 percent (27-point gap); autism, 42 percent (34-point gap); and multiple disabilities, 44 percent (24-point gap).

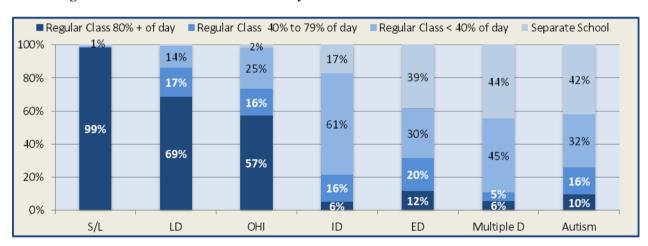


Exhibit 3g. Educational Environment Rates by Most Prevalent Disabilities

Configuration of Services and Achievement for Elementary Grade Students

The district provided elementary-school data comparing ELA and math achievement rates for students by service model. The exhibits below show the percentage of students in 2012-13 by grade level who were educated in co-taught and self-contained settings. Also, the data show the percentage of students educated at each service model, and the rate of elementary students with IEPs in each model scoring at level 2 or who met standards (levels 3 and 4) in ELA and math. Data are not reported for students in the self-contained models for 6:1+2 and 8:1+1 because the numbers were too small, and for 15:1 because data were provided only for 2011-12. Data were not provided for students at the secondary level.

Co-Taught and Self-Contained Class Rates by Grade Levels

BPS provided data on the number of classes by school using integrated co-teaching (ICT) and self-contained (SC) strategies. As shown in Exhibit 3h, 62 percent of the two elementary-grade class configurations are ICT, with rates ranging from 27 to 88 percent. Overall, co-taught class rates are smaller in schools with middle/high school grades (44 percent) and high schools (45 percent). The co-taught class rates at these schools range from 100 percent to 0 percent. (Note that rates should be considered cautiously since some numbers refer to less than 10 students.)

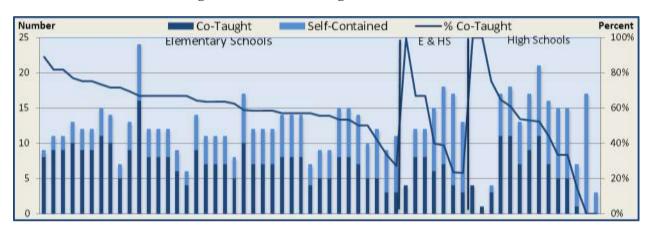


Exhibit 3h. Number/Percentage of Students Co-Taught and in Self-Contained Classes

Elementary School ELA Achievement and Special Education Model

Overall, only one percent of students with IEPs met standards and nine percent earned a level-2 score. As shown in exhibit 3i, only students receiving services from a consultant teacher (CT), services through ICT, or services in the self-contained 8:1+1 program had scores that met standards (8, 2, and 1 percent, respectively). Only students in these three models earned a level-2 score in double digits: CT (18 percent), ICT (14 percent), and 8:1+1 (13 percent). Half of the students with reported scores in 2012-13 were educated in the ICT model. A smaller percentage (22 percent) was educated in the RR model than in the SC model—i.e., 12:1+1, 8:1+1, and 6:1+1--(25 percent). (see Exhibit 3i.).

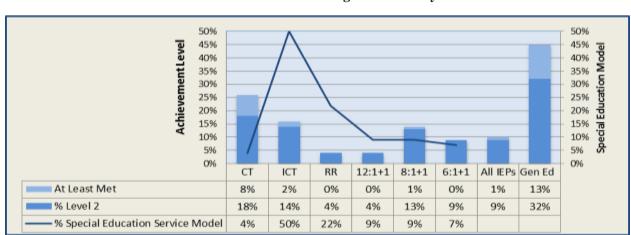
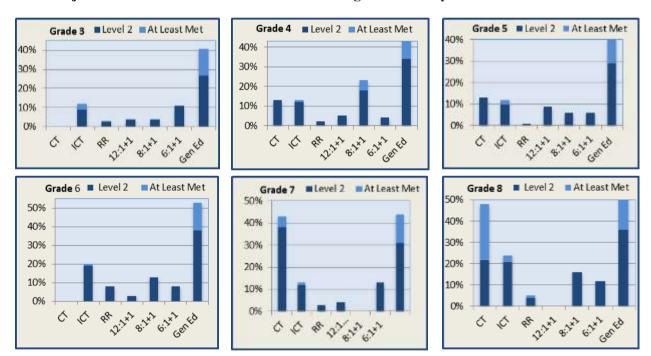


Exhibit 3i. ELA Rates for Level 2 and at Least Meeting Standards by Service Model

When the above data are sorted by grade level, the following patterns emerge (see Exhibit 3j.).

- *CT*. At the seventh and eighth grade levels, higher rates of students in the CT model scored at level 2 or above, compared with other models. While 26 percent of eighth graders met standards in CT, this rate represented only six students.
- *ICT*. At the third and sixth grade levels, a higher rate of ICT students scored at level 2 or above.
- CT/ICT/RR. At the fourth and fifth grades, students in CT and ICT models scored at level 2 or above at about the same rates. Except for third and sixth graders, students with RR services had achievement rates lower than students in CT/ICT services.
- *SC*. Fourth grade students receiving special education services through the SC 8:1+1 model had rates of students scoring at level 2 or above (23 percent) that were higher than students in CT/ICT models (13 percent each). For seventh grade students in a 6:1+1 model, 13 percent earned a level-2 score, the same as students in ICT (including level 2 and above scores).

Exhibit 3j. ELA Rates for Level 2 and at Least Meeting Standards by Service Model and Grade



Elementary School Math Achievement and Special Education Model

Compared to ELA results, a slightly larger percentage of students with IEPs who took regular math assessments met standards or better (see Exhibit 3k.) A substantially larger percentage of students with CT services met standards or better (11 percent), compared with those in any other model (0 to 2 percent).

However, the CT rate represented only 10 students. When combining all students scoring at level 2 or above, rates for students in ICT, 8:1+1, and 6:1+1 models were about the same (15, 15, and 13 percent, respectively), while the rate for students educated in the RR model was 3 percent.

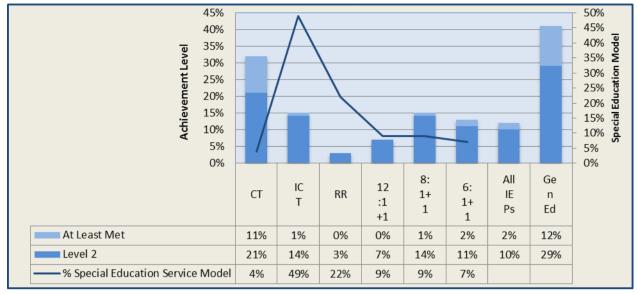
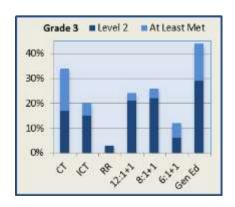


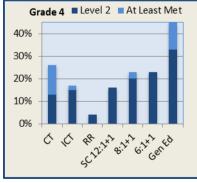
Exhibit 3k. Math Rates for Level 2 and at Least Meeting Standards by Service Model

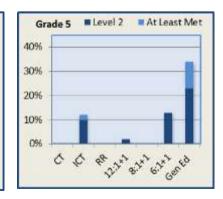
When the above data are sorted by grade level, the following patterns emerge (see Exhibit 31).

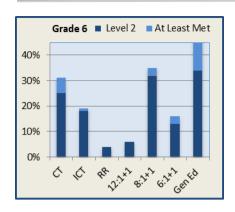
- CT. Except in the fifth grade, students receiving CT services had the highest rates for students at least meeting state standards. Furthermore, at the seventh and eighth grades, students receiving CT services had level-2 above rates that were higher than rates among students in general education. However, these rates only included the scores of 20 students with disabilities.
- CT/ICT. At the third and fourth grades, level-2 rates were similar for students in ICT and CT.
- ICT/SC. Third, fourth, fifth, and sixth grade students in one or two SC models had higher level-2 and above rates than students educated in the ICT model. Again, these SC models included only a small number of students (44).
- **RR**. The RR model showed the least benefit for students educated in general education classes for most of the day.

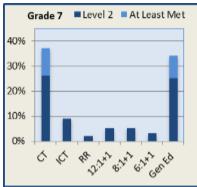
Exhibit 31. Math Rates for Level 2 and at Least Meeting Standards by Service Model and Grade

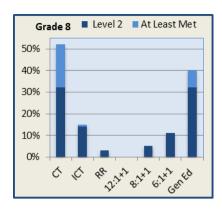












Integrated Co-Teaching Model

Several years ago, BPS began to phase in the ICT model of providing special education services to students. This model was meant to replace the consultant teacher model that had been in effect for most students. It also replaced resource rooms, used to a lesser extent for providing assistance with homework, testing accommodations, etc. Although there was a fairly consistent BPS perception that NYSED strongly influenced the elimination of resource rooms, an agency staff member told the Council team that their concern was focused mostly on the fact that consultation teachers did not appear to be engaged in any meaningful instructional activities.

This move to ICT was, in part, designed to compensate for special educators who did not have core-curricular content knowledge and with the hope that the new model would provide students with differentiated and meaningful access to the curriculum. In addition, it was anticipated that students would have fuller access to academic interventions in school. However, other than interventions available to students in self-contained programs, interviewees reported that students do not have sufficient access to the academic interventions necessary to address their significant academic needs. Several high school interviewees indicated that interventions were not available at their schools. Additional information about the availability of interventions is provided below.

Generally, focus group participants reported that the ICT model works well when it is supported by the school administration and when teachers have had adequate professional development and collaborative planning time. Several district leaders reported that they had not seen the model's benefit, and that special educators—too often—were assisting the general educator rather than actively teaching. There was also considerable frustration from teachers about the numbers of students with disabilities in their general classes who had performance levels far below their peers. The consideration of ICT for students appears to occur without any specific written guidance or criteria, which without accountability may inflate special education teacher allocations.

Challenges

Focus group participants shared the following challenges in the effective implementation of the ICT instructional model.

Changing ICT Teachers. When principals transfer trained ICT teachers to other positions, such as to self-contained classes, or when teachers transfer to other schools, it is more difficult to sustain the ICT instructional model. Some participants reported having an entirely different group of co-teachers each year, which means that schools have to start over with

training. Some interviewees recommended that co-teachers commit to the model for two to three years to maximize instructional effectiveness.

- *Common Planning Time*. Another common theme related to the lack of common planning time for co-teachers. Planning is especially challenging when special/general educators do not have the same schedules, they teach different courses during the day, and common planning time is not scheduled for either one.
- *Unrelated Assignments*. Reportedly, ICT educators are sometimes directed to cover other classes when regular teachers are absent and substitutes are not available.
- *Insufficient Curricular Knowledge*. Especially at the high school level, special educators who are not content-certified in the area of assignment are much less effective ICT partners. Although newer teachers tend to be content certified, this issue was reported as a major problem.
- Class Ratios. There were some reports that when classes are consolidated, students with IEPs comprise more than half the class. Following the Council team's review, an administrator reported and data were provided to the team showing pre-k through eighth grade ICT classes with only a few students with IEPs. According to these data, 14 ICT teachers were assigned to one student, 25 were assigned to two students, and 30 were assigned to three students. These teachers comprise about 17 percent of all ICT, CT, and RR teachers.

Instruction Primarily in Self-Contained Classes

Focus group participants consistently raised issues about the placement of students in self-contained classes, class sizes that exceeded state standards, and other teaching and learning issues.

Consistency of Service Designation

Although NYSED has established self-contained classes with maximum sizes based on various student characteristics, participants reported placements that were not based on these standards.

- There was a perception that students are placed first in 15:1 classes and then in smaller classes if they are not successful in the larger classes. As a result, these classes often have students with a wide range of abilities, a situation that makes instruction difficult.
- When transitioning to high school, it was reported that placement in a 15:1 class is encouraged rather than placement in classes with smaller ratios.

More Restrictive Environment or Special Class

The district's CSE Guide includes a provision for the completion of a *Request for a More Restrictive Environment or Special Class Form*. An LEA representative submits this form to a special education supervisor for review at least five days prior to the CSE meeting. The form is supposed to include documentation of the student's needs, along with a *Student Intervention Record*, *An Educational Benefit Form*, functional behavior assessment, and behavior intervention plan.

A subsequent conversation between the LEA representative and the supervisor involves reviewing the completeness of the data collection. Interviewees indicated that they were not permitted to make CSE recommendations that had not been approved by their superiors. However,

the CSE Guide states that this "procedure in no way supplants or circumscribes the CSE Process." Participants also reported that the form was not completed and submitted consistently.

Classes over Maximum Sizes

Reportedly, there are more classes over the NYSED maximum size this school year than in prior years because current classes are filled to capacity. Because of class shortages, seven students were awaiting placement at the time of the Council team's visit and other students have been assigned to schools across the district.

The Council team was informed that there was no written information describing the process for documenting, validating, and resolving oversize class problems. In the past, the highest-ranking special education administrator was part of the superintendent's cabinet, and it was easier to open new classes; but new classes have not been readily available during the current school year.

BPS special education personnel track data on the number of students in each self-contained class by school (see Exhibit 3m). Based on February 2014 data provided by the district, 56 elementary and 12 high school classes have students in excess of maximum class sizes for self-contained programs.

Classes based on a 15 student to 1 teacher ratio (15:1) have the most class overages. They are located at 19 elementary schools (56 percent) and four high schools (12 percent). Other self-contained classes that have high overages are as follows: 8:1:1 (13 classes), and 6:1:1 (9 classes). Overall, there were 68 class overages (23 percent).

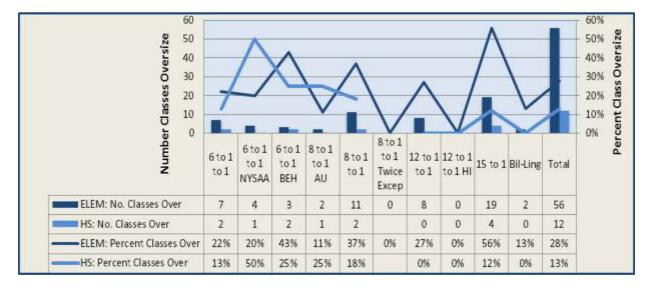


Exhibit 3m. Number/Percentage of Classes over Maximum Size

Exhibit 3n, which shows the number of class overages by grade, indicates that most are at the fifth grade (11 classes or 52 percent) and sixth grade (12 classes or 63 percent). The fewest are in kindergarten (three classes or 11 percent), 11th grade (two classes or 9 percent) and 12th grade (0 classes).

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⁴⁶ Page 18.

⁴⁷ 6:1:1 denotes six students, one teacher, and one paraeducator.

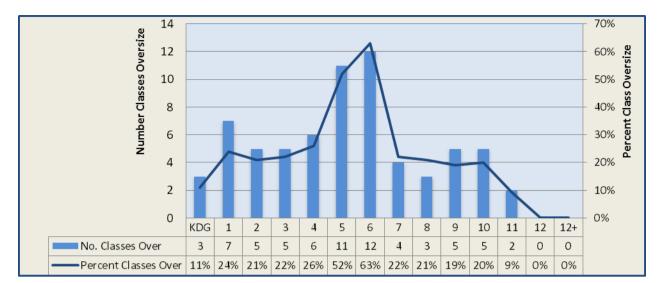


Exhibit 3n. Number/Percentage of Classes over Maximum Size

Other Placement Concerns

Interviewees expressed concerns that classes were housed in schools based on space availability and not on a master plan of equitable and geographic locations closest to student residences.

- *Multiple School Placements*. If a student exceeds the grade configuration in his/her self-contained class, he or she must transition to another school with the same overall grade configuration (e.g., elementary school) to attend other self-contained classes. As a result, students with IEPs were required to transfer to other schools more frequently than their nondisabled peers.
- Notice of/Preparation for Students. Sometimes students were placed without regard to
 current classroom profiles, geographic proximity to their homes, notice to teachers, or
 adequate supplies, e.g., desks. Reportedly, an increasing number of due process/CSE appeal
 requests have been filed to address the transfer of students across town for an available
 specialized class.
- **Teacher Capacity.** When new teachers are assigned or current teachers are reassigned to a new program, they do not always have the knowledge and skills necessary to teach their students, and they receive little support in obtaining them. There is a need for additional training, particularly for instructing students with autism.

Interventions

There appears to be a serious shortage of academic interventions, especially at the high school level and at all levels in math. Interventions are varied by school and are implemented unevenly. There also does not appear to be a comprehensive listing of interventions (academic/behavioral) available by school, including interventions that are based on multisensory methods. Various reading intervention programs are available only for certain self-contained programs. The well-regarded Unique Learning Program is available for students participating in alternate assessments.

Assistive Technology

There appears to be little assistance in the use of assistive technology. For example, staff members indicated that there were no procedures for addressing broken hardware. In addition, according to some focus group participants, there was a lack of accountability for how devices like iPads were used—or not used. One interviewee indicated that devices were locked in a closet and students did not have access to them!

Separate Schools

Reportedly, too many CSEs recommended separate schools because they believed the district lacked sufficient resources to address student needs. There were concerns as well that this recommendation was prompted by school achievement concerns. In the absence of support for more intensive services within the school, district data showed that 815 students (12 percent) have been placed by BPS in separate schools. According to district special education personnel, few of these students return to district schools.

Positive Behavior and Social/Emotional Support

Focus group participants expressed numerous concerns about supports for students with disabilities who also had behavioral challenges. Furthermore, as discussed below, NYSED notified BPS that African American students with IEPs were suspended for more than 10 days at significantly disproportionate rates, compared with peers from other racial/ethnic subgroups. 48

African American Disparity in Long-Term Suspensions

According to NYSED's February 12, 2014 letter to the district, African American students with IEPs were 2.56 times more likely than their peers from other races/ethnicities to be suspended for more than 10 school days during the school year. This weighted risk ratio constitutes significant disproportionality under NYSED's standard of 2.0 or above. The state also informed the district that it is at risk of significant disproportionality regarding suspensions of less than 11 days for African American students (1.66 weighted risk ratio). The district reported that <u>no</u> students received in-school suspensions.

As a result of its significantly disproportionate ratio of suspensions for African American students, the district was required to apply 15 percent of its 2014-15 IDEA funds to early intervention services (CEIS) for students in grades K-12. Also, the district was required to review and, if appropriate, revise policies, procedures, and practices related to disciplinary actions and publicly report any revisions.

In addition, NYSED indicated that it would conduct a monitoring review of the district during the 2013-14 school year to determine if BPS had appropriate policies, procedures, and practices relating to the development of IEPs, the use of positive-behavioral interventions, and supports and procedural safeguards.

⁴⁸ February 12, 2014 letter from NYSED to BPS.

Discrepancies between Data Provided to Council Team and NYSED

The Council team sought data to assess the extent to which students with IEPs were suspended, compared with their nondisabled peers. The 2012-13 data provided by the district to the Council team, however, was markedly different from the BPS data provided to NYSED (and shared with the team). The BPS data provided initially to the Council team, which is shown in Exhibit 30, indicated that of 7,742 students with IEPs, 1,263 (16 percent) were suspended. Also-

- 1-5 Days. 30 percent of students suspended for five days or less had IEPs,
- 6-10 Days. 36 percent of those suspended for six to 10 days had IEPs,
- *Over 10 Days.* Only three students with IEPs were suspended for more than 10 days, rather than the 344 suspensions reported to NYSED, and
- 1-10 Days. A total of 2,176 total students with IEPs were suspended for 1-10 days, compared to the 919 students reported to NYSED.

Suspension Length School Days	IEPs	% IEPs	No IEPs	Grand Total
1-5 Days	1574	30%	3742	5316
6-10 Days	602	36%	1061	1663
10+ Days	3	0.1%	10	13

2179

31%

4813

6992

Exhibit 30. Suspensions of Students with/without IEPs

The district also provided the Council team with three monthly Infinite Campus reports for the 2013-14 school year on short-term (one to five days) and long-term (six or more days) suspensions by school and by gender, race/ethnicity, and special education status. But percentages were provided only for students not suspended, which made it impossible for the Council team to compare rates for the various student subgroups.

Focus-Group Participant Concerns

Total Suspensions

Focus group participants also expressed the following concerns about behavioral supports for students with disabilities.

- *Training, Generally.* There was considerable interest in additional training and resources for behavior support and classroom management, including how to be more proactive with students presenting threatening behavior. Although there are school psychologists, along with two PBIS coordinators, three coaches, and three behavior specialists, interviewees indicated that the district needed more individuals who could provide targeted supports for teachers and their students.
- *SCIP-R Training*. Some participants indicated that they had not been allowed to receive training in Strategies for Crisis Intervention and Prevention Revised (SCIP-R) to help with students having the most aggressive behavior. According to the website of the New York State's Office for People with Developmental Disabilities (OPWDD), SCIP-R is an approved program for training staff in crisis prevention and intervention. The focus of this revised program is to empower staff with methods of assisting and teaching individuals to maintain

self-control and to train staff in engaging in proactive methods of positive behavior support.⁴⁹ Reportedly, some schools have established crisis teams, but they have not been SCIP-R trained.

- Suspension Hearings. Parents expressed concerns about hearings held for students suspended for more than five school days and about the lack of respect for parents and students exhibited by school personnel. They urged the Council team to listen to hearing tapes. However, the team was told that hearings have not been taped for some time.
- *Alternative School.* School 40 provides educational services for students with IEPs who are suspended because of disruptive behavior that is not manifested due to their disabilities. No transportation is provided, a limitation that hinders participation by some students.

ELL Interventions/Support

The Cross and Joftus 2012 report indicated "...concerns that English learners, especially those receiving special education services, do not have access to specialists and staff members who can meet their needs." Focus group participants expressed these same concerns to the Council team. Currently, there are no plans in place to address this issue.

- Fewer Service Options. ELLs with IEPs have fewer service options than their non-ELL peers. Only 15:1:1 or 6:1:1 self-contained classes are available to them, and many agencies will not accept ELLs because they lack appropriate language services. Bilingual support at schools is sometimes insufficient to meet the needs of all students. This issue is of particular concern to parents.
- *Use of Resources.* There were reports that some schools do not use all resources available to students and that instruction may be provided in a language that students do not understand.
- *Cultural Differences*. In addition to language differences, there are cultural issues that impact instruction for students that have different national origins. (See the Council review of ELL programming in the Buffalo schools.)

Extended School Year

Students showing significant regression when school is not in session receive extended school year (ESY) services. Students who participate in alternate assessments receive a full day of ESY service. Personnel working with these students work half-days (morning or afternoon); their schedules overlap somewhat in order to share information and facilitate transitions.

Although the shared work-day ESY model was implemented as a cost-saving measure, it presents administrative challenges with respect to hiring staff for only a half-day, e.g., teachers, counselors, and social workers. Also, there is little coordination between ESY and summer school to determine whether there may be opportunities to coordinate school sites and other support activities.

⁵⁰ Page 5.

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 $^{^{49} \} http://www.opwdd.ny.gov/opwdd_regulations_guidance/guidance_documents/strategies_for_crisis_intervention_a nd_prevention_revised_scip_r$

Professional Development

The Cross and Joftus report found a few best practices regularly observed in classrooms, but instructional rigor needs to be "ratcheted up."

Teachers need more training on and support for high-impact strategies to improve the effectiveness of their instruction. Mechanisms for using student data to identify professional development areas and evaluate the impact of professional development on student learning are also needed. And school leaders need more professional development and supports so that they too can be more effective in their roles. When specific training and coaching is a priority in BPS, it is thwarted in several ways. Comments throughout the review highlighted professional development that is "offered, optional, or encouraged" but never required, even when the training is critical to systematic district performance. ⁵²

Focus group participants reinforced these findings and indicated that the district has not invested in its administrators, teachers, teacher assistants, and other personnel sufficiently to ensure they have the knowledge and skills necessary for instructional rigor to be "ratcheted up" and for students to learn. With the mobility of personnel, the need for continuous professional development is essential. The turnkey method used by the district is based on a model whereby newly trained personnel instruct others. This method does not enable trainers to have a deep understanding of training materials or have a repertoire of experiences to answer difficult questions.

Co-Teaching

The Cross and Joftus report also indicated the following about training for co-teaching: "General and special education teachers also need more and better training on the district's integrated co-teaching model to be able to jointly improve teaching and learning for all students in inclusive settings."⁵³

Many focus group participants reinforced this finding. District personnel shared a new school-based training approach for ICT that included a combination of presentations, a period for implementation, then feedback and discussion. Attempts were made to involve school administrators and coaches in the training sessions. But attendance at external training sessions is not mandated, and all academic support personnel (e.g., school and external coaches, including those who support ELLs) do not have full access to training relevant to ICT and other areas important for teaching students with IEPs.

Modeling and Coaching

Focus group participants shared their desires to have experienced individuals provide classroom-based modeling and coaching so they could observe instructional strategies. They indicated that the use of videos was not sufficient because their classes often looked different from those in the videos, and it was difficult to generalize from video examples. District leaders indicated that a coaching model is in use, but this model was not evident from focus group reports.

⁵² Page 12.

⁵¹ Page 4.

⁵³ Pages 4 and 5.

Special Education School Improvement Specialists

The NYSED's Office of Special Education contracts with BPS for three special education school improvement specialists (SESIS) through the Buffalo City Regional Special Education-Technical Assistance Support Centers (RSE-TASC). The SESIS informed the Council team about the various resources they have to improve instruction for students with IEPs, including a checklist to guide the review of high-quality instructional practices. However, it was not evident that the district has leveraged these resources effectively to support high-quality research-based practices systemwide. The SESIS are in the fifth and last year of the NYSED contract.

Learning Walk Cycles

According to the district's status report included in the Distinguished Educator's November 2013 Action Plan Status Update, the curriculum, assessment and instruction group is "conducting learning walk cycles made up of SPED/content directors to determine the fidelity of the Integrated Co-Teaching model throughout the district." Instructional leaders of each school are expected to monitor ICT and to embed professional development as part of this process. The Status Update indicated that "[t]here continues to be a need to provide more PD to school leadership teams on proper classroom monitor[ing] and use of resources." 55

Postsecondary Transition Services and Activities

This section summarizes graduation rates, IEP diplomas, and students remaining in school, as well as information about the district's postsecondary transition services and activities.

Rates for Graduation, IEP Diploma, and Students Still Enrolled

The following information pertains to students with/without IEPs who graduated, received IEP diplomas, or were still in school at the end the 2010 to 2013 period (see Exhibit 3p).

- *Graduation*. The graduation rates for students with/without IEPs steadily increased between 2010 and 2013. The rate for students with IEPs increased from 25.1 percent in 2010 to 32.6 percent in 2013. The rate for students without IEPs grew from 52.6 percent in 2010 to 62 percent in 2013.
- *IEP Diploma*. The IEP diploma rate dropped from 13.1 percent in 2011 to 9.1 percent in 2013. The graduation gap between students with/without IEPs has fluctuated across the four school years: 32.3 percentage points in 2011 and 27.5 in 2010 and 2012. In 2013, the gap was 29.3 percentage points. As of July 1, 2013, the IEP diploma was no longer available in New York.
- Still Enrolled. There was a small increase in the rates of students with and without IEPs who continued to be enrolled after four years of high school. In 2010, 23.5 percent of students with IEPs and 16.2 percent of students without stayed on; in 2013, 25.5 percent of students with IEPs and 16.7 percent of students without IEPs remained enrolled.

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⁵⁴ Specific Deliverable 7.f. at page 31.

⁵⁵ *Ibid*.

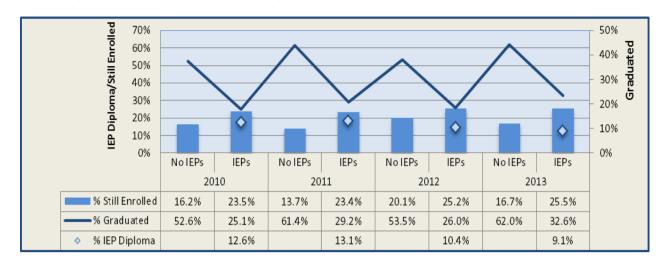


Exhibit 3p. Rates for Graduation, IEP Diploma and Students Still Enrolled

Dropout Rates

The percentage of students with IEPs who dropped out of school fell 6.3 percentage points from 38.8 percent in 2010 to 32.5 percent in 2013. The percentage of students without IEPs fell about 10 percentage points during this same period, increasing the dropout gap between students with/without IEPs from 7.5 to 11.2 percentage points (see Exhibit 3q).



Exhibit 3q. Percentage of Students with IEPs and without IEPs who Dropped Out of School

Focus group participants expressed concern that some students with IEPs were counseled to drop out of high school or that the students did so because of frustration with their lack of achievement and engagement.

Importance of Community-based Work Experiences for Students with Disabilities

National Longitudinal Transition Study-2 data show that students with disabilities have poor postsecondary outcomes in employment, education, and independent living. For instance, based on the latest data from 2009, 60 percent of survey respondents across disability groups indicated that they were currently in a paid job, and 15 percent indicated that they were attending postsecondary education. Large numbers of students with disabilities who are able to either work

or participate in higher education after they leave high school do not participate in these post-school activities. ⁵⁶ According to an American Institutes for Research study,

Previous studies have demonstrated that students with disabilities who have work experiences while in high school are more likely to be employed after high school.⁵⁷ Often the work experience in which they were enrolled led directly to a postsecondary job for a student. For these students, it is important to have occupationally specific CTE programs, with appropriate instructional and adaptive support services and accommodations, available in high school.⁵⁸

The National Collaboration on Workforce and Disability reinforced this finding further by reporting that "[w]hile work experiences are beneficial to all youth, they are particularly valuable for youth with disabilities. For youth with disabilities, one of the most important research findings shows that work experience during high school (paid or unpaid) helps them get jobs at higher wages after they graduate." The National Collaboration published research showing that quality work-based learning experiences include these characteristics:

- Experiences provide exposure to a wide range of work sites in order to help youth make informed choices about career selections.
- Experiences are age and stage appropriate, ranging from site visits and tours, to job shadowing, internships (unpaid and paid), and paid work experience.
- Work site learning is structured and links back to classroom instruction.
- A trained mentor helps structure the learning at the worksite.
- Periodic assessment and feedback is built into the training.
- Youth are fully involved in choosing and structuring their experiences.
- Outcomes are clear and measurable.

Career Development and Occupational Studies Commencement Credential and BPS Activities

Beginning in the 2013-14 school year, New York students with disabilities were able to earn a Career Development and Occupational Studies Commencement Credential (CDOS Credential or Credential), which reflects a student's preparation and skills for post-school employment. Community-based work programs for students with disabilities help them earn the credential. Monthly, the district's Career and Technical Education (CTE) committee, which includes a special education director, meets to develop policies and procedures relevant to the credential.

The district has a few years to comply fully, and students can begin to graduate with the credential this school year.

⁵⁶ National Longitudinal Transition Study-2. Retrieved from http://www.nlts2.org/

⁵⁷ National Collaborative on Workforce and Disability for Youth, 2011.

⁵⁸ Improving College and Career Readiness for Students with Disabilities American Institutes for Research <a href="https://www.google.com/search?q=while+work+experiences+are+beneficial+to+all+youth%2C+they+are+particularly+valuable+for+youth+with+disabilities.andie=utf-8andoe=utf-8andaq=tandrls=org.mozilla:en-US:officialandclient=firefox-a

⁵⁹ http://www.ncwd-youth.info/work-based-learning

CTE Programs and Postsecondary School Outcomes

Based on a report provided by BPS, there were 35 CTE programs, and at least one exists in each high school. The goal is to have at least one differentiated program in each building. Reportedly, these differentiated programs would meet one of the criteria for students to earn the CDOS Credential. CTE conducts a phone survey of students, including those who participated in differentiated CTE programs, six months after they leave high school to track their postsecondary status. Last year the overall response rate was 49 percent.

The latest data available from the NYSED Special Education School District Data Profile for BPS shows that within one year of leaving high school, 29 percent of students who had IEPs were enrolled in higher education or another type of education/training program, 21 percent were competitively employed, and 14 percent were in some other employment (see Exhibit 3r.).

The overall 64 percent rate of students with IEPs that were enrolled in higher education, competitively employed or in some other postsecondary education or training program was 14 percentage points below the state's target of 74 percent.

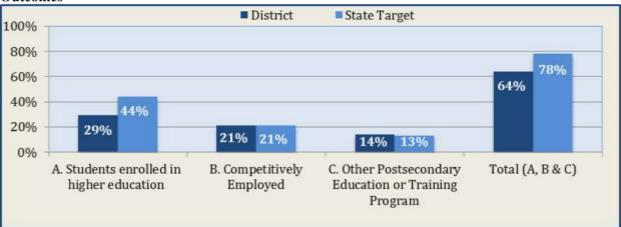


Exhibit 3r. Within One Year of Leaving High School, Percentage of Students Who Had IEPs by Outcomes

Occupational Training Center

The district also has an Occupational Training Center (OTC) that prepares students to perform skills needed to function successfully within a variety of community environments. These environments include, but are not limited to, their place of residence, employment settings, consumer/service settings, and social/recreational activities. ⁶⁰

College Campus Based Transition Program

The College Campus Based Transition Program is a collaborative involving the district, Buffalo State College, People, Inc., and parents. It is a non-degree campus-based program that provides transition support for students with significant disabilities who have completed their education in BPS high schools but continue to be eligible for public school services.

⁶⁰ http://www.buffaloschools.org/OccupationalTrainingCenter.cfm?subpage=1109

Focus Group Participant Feedback

Focus group participants expressed the following concerns about BPS's postsecondary transition services and activities. These concerns were also discussed in the Cross and Joftus 2012 report that described the secondary transition plans and services for BPS students with disabilities as weak.⁶¹

- Access to Services. All students with IEPs who have reached the age for transition services do not consistently have transition assessments, and even if the assessments are completed, they are not adequately reflected in the development of IEP transition planning.
- Work Experiences. Except for students at OTC, there is minimal access to on-site work experience and no evidence of coaching, job shadowing, school-based enterprises, college and career exploration. The perception is that there are fewer opportunities for community-work experiences now than in the past. One school (Hillside) was reported to provide tutoring, mentoring, and opportunities to work during the school day.
- *CDOS Commencement Credential*. Parents are concerned about the elimination of the IEP diploma. They indicated that they needed more information about the new CDOS Credential and how it applies to their children.

Postsecondary Transition Planning

In New York, school districts are to begin transition planning for students with IEPs by 15 years of age. The planning process includes age-appropriate transition assessments, transition services, courses of study that will reasonably enable the student to meet postsecondary goals, and annual IEP goals related to the student's transitional needs. Transition services and supports prepare students for employment and independent living through a coordinated set of activities that promote movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation. The SPP has a 100 percent compliance rate for this indicator. However, NYSED's last publicly reported Special Education School District Data Profile did not include this information about BPS.

According to focus group participants, special education teachers facilitate interest assessments, and school personnel provide students with linkages to adult service-providers. Also, there are monthly in-service meetings to provide information about transition services.

AREAS OF STRENGTH

The following are areas of strength regarding teaching and learning for students with IEPs.

- *BPS/Agency Collaboration*. BPS has a good working relationship with the agencies that provide services to district students with IEPs, particularly preschoolers with disabilities.
- *Inclusive Education*. Overall, BPS, agency and charter schools met the 53 percent target for educating students in regular classes for at least 80 percent of the day, and narrowly missed the 24 percent target for educating students in regular classes for less than 40 percent of the day.

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⁶¹ Page 5.

- *Investment in ICT*. The district has invested heavily in the ICT model of instruction for students who are educated most of the time in general education classes. A high percentage of elementary school students with IEPs are co-taught (62 percent). Percentages for elementary grades vary from 27 percent to 88 percent. Focus-group participants indicated that ICT instruction is more effective when school administrators support the process, teachers are paired with the program based on their compatibility, and teachers have time to work together. There were concerns about the overall fidelity of instruction in this model, however.
- *ICT Support*. A new school-based training approach includes a combination of presentation, a period for implementation, then feedback and discussion. The CAI team conducts learning-walk cycles with special education and content directors to observe the fidelity of ICT instruction, and school instructional leaders are expected to monitor ICT and support training.
- *Curriculum and Interventions*. Various reading intervention programs are available for some self-contained programs, and the Unique Learning Program is available for students participating in alternate assessments.
- *SESIS*. The three special education student improvement specialists (SESIS) have valuable resources and specific knowledge about how to improve student outcomes, including skills in explicit instruction and a specially designed checklist to guide the review of high-quality instructional practices that could be leveraged districtwide.
- *Graduation and Dropout Rates.* Graduation rates for students with/without IEPs have steadily increased between 2010 and 2013. The rate for students with IEPs increased from 25.1 percent (2010) to 32.6 percent (2013). The school dropout rate for students with IEPs fell 6.3 percentage points from 38.8 percent (2010) to 32.5 percent (2013).
- Postsecondary Transition Services. The district's CTE committee, which includes a special education director, meets monthly to develop policies and procedures relevant to the CDOS Credential. The district has a few years to fully comply with this new program, and students can begin to graduate with the credential this school year. The differentiated programs developed by CTE are promising. This program is a modified version of CTE courses, so students can pass the CTE certification requirements. There is a goal to have at least one differentiated program in each high school. At least one school (Hillside) provides tutoring, mentoring, and opportunities to work during the school day. The College Campus-Based Transition Program is a non-degree campus-based program providing transitional support for students with significant disabilities who have completed their education in BPS high schools but are still eligible for public school services. Special education teachers facilitate completion of interest assessments, and school personnel provide students with linkages to adult service providers. Also, there are monthly in-service meetings to provide information about transition services. CTE aggressively tracks students, including those with IEPs, using surveys after six months out of school, with a variety of high-incentive strategies to induce response.

OPPORTUNITIES FOR IMPROVEMENT

The following areas represent opportunities for improvement.

- Agency Services for Preschoolers with IEPs. The state's reliance on private agencies to evaluate and educate preschoolers with IEPs unnecessarily separates these services from the public schools in which most of these children will eventually attend for kindergarten. Exemplifying this problem is NYSED's refusal to allow the district to open a self-contained preschool class for children at a specialized school that is associated with a major hospital because agency schools were not filled. This reliance places the district in a position where it is accountable for ensuring these children receive a timely evaluation and placement, yet it is not in control of the evaluation and service components. This service configuration also provides the district with no ability to directly improve outcomes for preschool students in special education classes that are measured by the state performance plan.
- Outcomes for EC Children with IEPs. BPS rates for the six indicators pertaining to young children with IEPs ranged between 36 and 23 percentage points below the state targets for growth and functioning in positive social/emotional skills, acquisition and use of knowledge and skills, and use appropriate behavior to meet their needs
- Placement of EC Children with IEPs. In 2012-13, through its early childhood (EC) program, the district educated 70 percent of preschoolers with IEPs, and special education/related services were provided either in or outside of EC for a portion of the day. Of these 407 young children, 64 percent were classified with speech/language (S/L) impairments. Only 21 percent of the EC children and 9 percent of those with S/L were educated most of the day in regular classes.
- *Placement of School-Aged Students with IEPs*. The following summarizes the educational settings of the school-aged students with IEPs.
 - 80 Percent or More in Regular Education. 55 percent of students in BPS's jurisdiction are educated inclusively, compared to the nation's 59 percent rate. Not counting charter schools, the BPS/agency rate is 52 percent, just below the state's 53 percent target. Almost all students with speech/language impairments (99 percent) are educated inclusively, followed by students with learning disabilities (69 percent) and other health impairments (57 percent). Comparing ICT to SC classes, ICT accounts for 62 percent of elementary school classes (ICT rates at individual schools vary from 27 percent to 88 percent), and 45 percent of high school classes (school rates vary from 100 to 0 percent).
 - Less than 40 Percent in Regular Education. Some 20 percent of BPS students are educated in self-contained settings (meeting the state's 24 percent target), compared to the nation's 21 percent rate. In various disability areas, the percentages of students in separate classes are much higher than national averages: intellectual disability (61 percent rate exceeds the nation's rate by 13 points), emotional disturbance (30 percent rate exceeds the nation's rate by 12 points), and learning disability (14 percent rate exceeds the nation's rate by 6 points).
 - Separate Schools. 11 percent of BPS students are in separate schools, compared with the nation's 3 percent rate and the state's 7 percent target.⁶² High schools have the highest percentage (17 percent), followed by middle and elementary school grades (12 and 10 percent, respectively). High rates for some disability areas significantly exceed national rates: intellectual disabilities (BPS 17 percent, 9 percentage points higher than the national rate), emotional disturbance (BPS 39 percent, 27 percentage points higher),

⁶² Not counting charter schools, the district rate is 12 percent.

autism (BPS 42 percent, 34 percentage points higher), and multiple disabilities (BPS 44 percent, 24 percentage points higher).

- Overall Achievement of School-Aged Students with IEPs. Overall, based on a report of achievement scores by year provided by the district, 2012-13 scores of at least proficient were very low for students with IEPs at the elementary-grade level in ELA (2.4 percent) and math (3.2 percent) and at the high school level in reading (8.5 percent) and math (0.9 percent). The 2012-13 school year was the first one that involved assessments tied to the Common Core State Standards. Interestingly, because the scores for students without IEPs were much lower than in prior school years, the achievement gap narrowed between students with/without IEPs for elementary grades in reading (a gap of 11.8 percentage points) and math (a gap of 8.3 percentage points) and high school grades in reading (a gap of 30.4 percentage points) and math (a gap of 5.8 percentage points). The district's strategies for improving achievement for students in priority and focus schools did not appear to include any specificity for the subgroup of students with IEPs in those schools.
- Service Model and Achievement. The consideration of ICT for students appears to occur without any specific written guidance or criteria, which, without accountability may inflate special education teacher allocations. There are significant concerns about the extent to which this instructional model is benefiting student learning. A BPS report provided ELA and math scores of elementary-grade-level students by service model. Because the rates of all students who met standards were so low, the Council team also looked at students who met level-2 standards. About 2,300 students with IEPs took a regular elementary-grade-level assessment in 2012-13. Of these students, about 50 percent were educated with the ICT model, 21 percent with the RR model, and only 4 percent with the CT model. As described below, higher rates of students served in the CT model at least met standards (8 percent for ELA and 11 percent for math). However, these students represented only a small number of students (87), and they tended to have less intensive instructional needs. The RR approach had the lowest achievement rates in ELA and math. The BPS report did not include 2012-13 school-year data for the SC model (15:1), and a similar report was not provided for high school students with IEPs.
 - ELA. Overall, 10 percent of students with IEPs earned a score of level-2 or above. Double-digit rates were earned by students in the following service models: CT (26 percent), ICT (16 percent), and 8:1+1 (14 percent). Only 4 percent of students educated in a resource-room model scored at this level.
 - Math. Overall, 12 percent of students with IEPs earned a score of level-2 or above. Double-digit rates were earned by students in the following service models: CT (32 percent), ICT and 8:1+1 (15 percent) and 6:1+1 (13 percent). Only 3 percent of students educated in a resource room model scored at this level.
- *Instruction*. Teachers are struggling with providing instruction aligned with CCSS, keeping up with pacing guides, and providing interventions to address seriously low student achievement and serious learning deficits. These challenges are more significant for students with disabilities. Other issues that impact instruction include: mobility of ICT educators, lack of common planning time for teachers, directives for ICT educators to cover absent teacher classes, insufficient curricular knowledge, and high proportion of students with IEPs in classes. Current instructional methodology, including the use of differentiated instruction, intervention support, short-term progress monitoring, and problem solving with data to inform instruction, have not been adequate to enable students to be career and college ready.

- Self-Contained Programs. Students are not always placed in separate class programs consistently and with regard to established standards. In addition, the procedure for providing information to the special education department prior to team meeting decisions is not consistently followed. Although written information indicates that this discussion does not supplant or circumscribe the CSE process, there was some concern that approval for more restrictive settings was required. Other concerns relate to multiple school placements for students who articulate between grades, insufficient notice of and adequate supplies for new teachers, and sufficient knowledge and skills of teachers. When transitioning to high school, it was reported that student placements in a 15:1 class was encouraged, rather than in classes with smaller ratios.
- Class Size Overages. A number of classes exceed state standards: 56 classes at the elementary-grade level, and 12 at the secondary-grade level. Classes based on a 15:1 ratio have the most class overages, and most overages are at grades 5 and 6. The fewest class overages are at kindergarten and grades 11 and 12. Written information does not describe the process for determining class overages and for documenting, validating, and resolving the problem. In the past, a cabinet-level special education administrator was able to arrange for new classes when needed. However, with the change in administration, the process now takes longer. New classes are based on school space availability and not on a master plan of equitable and geographic locations that consider student residences.
- *Instructional Support*. There is a lack of interventions districtwide sufficient to address various needs, including those based on multi-sensory methodology and those needed for ELLs and secondary-grade students. There also appears to be insufficient support and accountability for the use of assistive technology.
- Separate Schools. Reportedly, too many CSEs recommend separate schools because they believe the district lacks sufficient resources to address student needs. There were also concerns that this high rate is prompted by school personnel who believe that these students bring down school achievement rates. Absent more intensive services and supports in regular schools, BPS data report 815 students (12 percent) were placed in separate schools. According to district special education personnel, few students return to district schools.
- Suspensions. On February 12, 2014, NYSED notified BPS that, based on 2012-13 data, African American students with IEPs were suspended for more than 10 days at a rate that was significantly disproportionate (2.56 times more likely than peers from other racial/ethnic subgroups). To address its significantly disproportionality, the district is required to use 15 percent of its IDEA funds to provide coordinated early intervention services for students in grades K-12, and NYSED will be monitoring the district in this area. Although BPS reported to NYSED that 344 students with IEPs were suspended for more than 10 days, the district provided the Council team with data showing only 3 suspensions of students during this period. Furthermore, these data indicated that 30 percent of students suspended for five days or less had IEPs; and 36 percent of those suspended for six to 10 days had IEPs. In addition, the number of students with IEPs suspended during the same school year was significantly different in the two data reports. The district reported no students with in-school suspensions. When students have a change in placement (more than 10 consecutive days) and are educated at alternate sites, they are not provided transportation. The monthly 2013-14 Infinite Campus reports provided to the Council team showing suspensions by various categories did not include data comparing student groups and schools.

- *ELLs with IEPs.* Focus group concerns underscored findings in the Cross and Joftus report that ELLs, especially those receiving special education services, do not have access to specialists and staff members who can meet their needs. ELLs have fewer special education service options than their English-proficient peers, and bilingual resources are scarce. Meeting students' cultural differences and providing adequate translation for parents were also concerns.
- Postsecondary Transition Services and Support. There is concern that some students with IEPs were counseled to drop out of high school or that students did so because of their frustration with achievement and engagement. Reportedly, all students with IEPs who have reached the age for transition services do not consistently have transition assessments, and even if assessments are completed, they are not adequately reflected in IEP transition planning. Except for students at OTC, there is minimal access to on-site work experiences and no evidence of coaching, job shadowing, school-based enterprises, college and career exploration, etc. even for students at OTC. Parents need more information about the elimination of the IEP diploma and the plans to support students to meet new requirements for the CDOS Credential.
- Extended School Year. Students who participate in alternate assessments receive a full day of ESY. However, personnel work half-days only (morning or afternoon). Although this model was implemented as a cost-saving measure, it presents administrative challenges with respect to hiring part-time staff, e.g., teachers, counselors, and social workers. It also requires students with significant cognitive disabilities to transition between two sets of personnel. There is no coordination between ESY and summer school to determine whether there might be opportunities to coordinate school sites and other support activities.
- **Professional Development.** Information provided to the Council team reinforced the Cross and Joftus finding that instructional rigor needs to be "ratcheted up" and teachers need more training and support for high-impact strategies to improve the effectiveness of their instruction. In addition, school leaders need more professional development and supports so that they can be more effective in their roles. Focus group participants indicated as well that general/special educators need more effective ICT training so they are able to jointly improve teaching and learning for all students in inclusive settings. Attending external training sessions is not mandated, and all academic support staff members (e.g., school and external coaches, including those who support ELLs) do not have full access to training pertinent to ICT and other areas to improve instruction. There is insufficient training by experienced individuals to provide classroom-based modeling/coaching so that teaching and academic support staff can observe effective instructional strategies. More professional development is needed on proper classroom monitoring and use of resources. The SESIS are in their fifth and last year of their contract with the NYSED, but it appears that their work could be more embedded into BPS's overall infrastructure of support and operations. Additional training is needed to support positive student behavior and classroom management, crisis intervention/prevention, and making manifestation determinations.

RECOMMENDATIONS

- 3. Expand options for inclusive preschool programming for young children with IEPs.
 - a. Research. With general/special education leaders and principals, teachers, related services personnel, parents, and community members, reconfigure the district's current programming for preschoolers with/without IEPs, including support for students enrolled

in Head Start. Review research and curricular standards for early childhood learning and the components necessary to produce higher outcomes for young children, especially those with IEPs. Consider this research when revamping programming for children currently educated in agency settings, where children do not interact with nondisabled peers.

- **b.** Gap Analysis and Planning. Identify gaps between the research findings and the instruction/support currently provided to preschool children with IEPs, and develop a plan for addressing these gaps, including professional development from all funding sources. Begin implementing the plan in the 2015-2016 school year.
- 4. Significantly improve meaningful and effective instruction and supports in inclusive settings. Currently, BPS has a very low achievement level for students without IEPs, and even lower rates among students with IEPs. It is unlikely that the achievement of students with IEPs will increase markedly without full implementation of MTSS and full access to evidence-based academic/behavior interventions/supports that are implemented with fidelity. Recommendation 2 addresses activities to support MTSS implementation. To address the achievement of students with IEPs, it is not sufficient to simply change service models, e.g., from integrated co-teaching to resource rooms.

Various activities may be implemented in the 2014-15 school year; however, the Council team does not recommend a systemic change for next school year, given the planning and preparation needed to effect changes of this magnitude. However, given the poor performance of students with IEPs, the team recommends next year to have small groups of principals from schools with similar demographics meet with SESIS, other knowledgeable special education administrators, and school leadership chiefs to review their ICT models to determine if other model(s) for differentiated instruction and targeted interventions might be beneficial. Base implementation on (1) written individualized school plans; (2) approval of the relevant chiefs, principals, and special education administrator; and (3) the application of federal/state procedures required through the CSE/IEP decision-making process.

The planning activities described below are meant to be fully implemented in 2015-16. These activities are not intended to be comprehensive, but they are provided to initiate discussion and further development.

- a. Leadership Team. Have the MTSS leadership team ⁶³ develop a plan for effective inclusive instruction and supports for students with IEPs. Because of their knowledge of and access to research-based materials, include SESIS personnel. Have status reports of ongoing planning and implementation presented to the MTSS leadership team to ensure cohesiveness; avoid fragmented efforts; and leverage/coordinate resources, training, monitoring, data reporting, etc. Engage a skilled external facilitator to support project staff in managing this planning and implementation process.
- **b.** *Implementation Plan Feedback.* Ensure the implementation plan includes feedback from leadership chiefs, knowledgeable principals, and school-based personnel from differing grade levels, along with parent representatives.
- c. Student Characteristics and Learning Profiles. Begin the planning process by taking a relatively short period (one to two months) to collect and summarize the diverse

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⁶³ Use of the extended MTSS leadership team is recommended to ensure that planning processes are not fragmented and they are coordinated to the maximum extent possible.

characteristics of students with IEPs currently educated in consultative teaching, integrated co-teaching, and resource room models. Present data on the effects of each approach on academic skills (reading, math, writing, speaking, listening, etc.); behavior (passivity, attentiveness, aggressiveness, emotionality, etc.); organizational and study skill profiles; language and cultural considerations; and hearing, vision, physical needs, etc. In each area, describe relevant characteristics and gaps with nondisabled peers. Obtain feedback from a broad group of school-based personnel to ensure comprehensiveness of the product. When finalized, consider drafting a learning profile for teachers and/or teams for individual students in order to provide instruction from general and special educators.

- **d. Description of Standards and Expectations.** Using the diverse-learning profiles as reference (Recommendation 4c), identify literature and recommendations from this report, along with other sources on instructional successes and challenges, and develop a set of written standards and expectations in such areas as the following:
 - 1) General. The parameters of (differentiated) instruction/research-based interventions, related services, and social/emotional supports and engagement, language services/support, assistive technology.
 - 2) Core Content Knowledge that special educators need.
 - 3) *Differentiated Instruction*. How teachers are to be supported in differentiating instruction in ways that are meaningful and effective.
 - 4) Interventions. The comprehensiveness of academic/behavior interventions (purchased or publicly available) necessary to meet diverse student learning needs, including crisis intervention and prevention training.
 - 5) Assistive Technology. Clarity on assistive technology, including access, usage, maintenance, training for students and teachers/parents, etc.
 - 6) FBA/BIPs. Development and use of functional-behavior assessments and behavior intervention plans.
 - 7) *Linguistic/Culturally Appropriate*. Evidence-based linguistic and culturally appropriate instruction for students with IEPs who are ELLs.
 - 8) **Problem Solving.** Involvement of professional learning communities and data-driven decision making to address achievement of students with IEPs through the use of a problem-solve process that would address barriers and implementation issues.
 - 9) **Progress Monitoring.** Effective progress monitoring and use of formative assessments to show student progress over relatively short periods of time.
 - 10) Common Planning Time. Collaboration between general/special educators and common planning time for instruction/intervention.
 - 11) ICT Student-Teacher Ratios. Reasonable minimum ratios for students to special educators for the ICT model.
 - 12) Paraprofessionals. Consideration and use of paraprofessionals.
 - 13) Meaningful Parent Participation, including translation services for parents who are English language learners, etc.

- 14) People-First Language usage. 64
- e. Implementation Considerations. To facilitate implementation of these standards and expectations, have the leadership team discuss the following issues, document the conclusions, and develop worksheets to support implementation of strategies for individual students, groups of students, and schools:
 - 1) **Determining Interventions.** A process for determining the intensity of academic/behavioral interventions required and identifying needs in each student profile.
 - 2) Configuration of Resources that maximizes student access to differentiated instruction based on the CCSS and access to interventions based on need. As part of this process, consider the following:
 - a) Differentiation of Instruction for students who have achievement levels in reading and math that are significantly below their classroom peers.
 - b) Maximum Leverage of School Staff, including ways that are different from those currently in place.
 - c) Flexible Groupings. Use intervention centers for students with (and without) IEPs needing similar interventions and other support centers for homework/studying assistance. Change groups based on student needs and successful outcomes.
 - 3) **Scheduling** interventions and collaborative planning between teachers and related services personnel;
 - 4) **Professional Development** needed to implement standards and expectations with a high degree of fidelity.
 - 5) Monitoring of ICT Student-Staff Ratios to ensure they meet established minimum standards.
- f. Exemplary Inclusive Instruction/Intervention Implementation Models. Based on student outcomes, identify and share models of exemplary practice in effective inclusive instruction/interventions, including those involving ELLs with IEPs and twice-exceptional students. Enable staff members to visit the schools and identify staff members who demonstrate the standards and provide training to their peers.
- **g.** Differentiated Training. Based on the professional development needs identified in Recommendation 4.e., develop a comprehensive and differentiated professional development program that includes components referenced in 2.e. Include in differentiated training activities all teachers, coaches and other personnel that support schools.
- **h.** Evaluation of Effectiveness. Evaluate the effectiveness of program implementation with data that include the following:
 - 1) Baseline Data. Establish baseline data on current instructional practices and outcomes. Use the Office of Shared Accountability report on elementary schools, which provided achievement data on special education service models, as a template to report comparable data on high schools.

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⁶⁴ See *Examples of People First Language* at http://www.inclusionproject.org/nip_userfiles/file/People%20First%20Chart.pdf

- 2) Data and Reports. With a collaborative group of central office and school-based staff, expand the data and reports referenced in Recommendation 2.g to include information on (1) the number/percentage of students in various educational settings, (2) the use of academic and behavioral interventions for students with IEPs, (3) the results of these interventions, and (4) summary data on various groups and combinations of groups, e.g., schools, grades, ELLs with IEPs, etc.
- 3) Walk-Throughs. In addition to the data reports mentioned in Recommendation 4.g.(2) to monitor the effectiveness of inclusive instruction and interventions/support, modify the walk-through protocols and checklists to include core practices and their implementation and the extent to which they conform to standards and expectations.
- *i. Timely Communication and Feedback.* Establish a process for timely feedback to the MTSS leadership team (1) on implementation barriers and solutions reached using a problem-solving process and (2) on when schools require additional assistance in resolving issues.
- 5. Specialized Classes and Schools. Improve instruction meant to accelerate the achievement/social-emotional wellbeing of students currently in specialized classes, and reduce reliance on this setting.
 - a. Leadership Team. Have the MTSS leadership team develop a plan for more effective instruction and supports for students in specialized classes, and oversee implementation of the plan.
 - **b.** Student Characteristics and Learning Profiles. Begin the process by taking a relatively short period, i.e., one to two months, to summarize the range of characteristics and learning needs of students currently educated in specialized classes and in separate agency schools. Ensure that the leadership team has the information.
 - c. Description of Standards and Expectations. Based on student profiles, develop the standards and expectations referenced in Recommendation 4.b., and apply them to students being educated in these specialized classes. In addition, consider the following:
 - 1) Significant Achievement Gaps. For students taking regular assessments and having significantly lower reading and math levels, consider how the district is differentiating instruction with the CCSS and providing interventions/supports.
 - 2) Appropriate Interventions/Supports. For students with behavior that is the primary reason for instruction outside of the general education classroom, consider how the district is using interventions and supports to meet their needs and whether those strategies and tools are appropriate for those needs.
 - 3) *Linguistic/Culturally Appropriate*. Consider service configurations that would provide evidence-based linguistically and culturally appropriate instruction for students with IEPs who are ELL.
 - 4) Problem Solving. Consider involving professional learning communities and use of data-driven decision making to address the academic progress of students in specialized classes.
 - 5) *Progress Monitoring*. Consider progress monitoring and use of formative assessments to gauge student progress over relatively short periods of time.

- 6) Extended School Year. Consider parameters for extended school-year programming with respect to half-day versus full-day staffing, along with staffing implications on student learning.
- 7) *Postsecondary Transition*. In conjunction with Recommendation 7, consider research-based postsecondary transition planning, activities, and services likely to lead to successful post-school outcomes.
- 8) *Unique Learning System*. Consider fidelity of the Unique Learning System implementation.
- 9) Integration Opportunities. Consider opportunities for students to learn/interact with nondisabled peers in general education classes and nonacademic/ extracurricular activities. In this regard, explain federal regulatory language with examples of standards/expectations but do not solely mirror the requirements.
- 10) Placement Parameters. Consider the placement parameters for each specialized class, based on the intensity and types of supports needed. Consider whether the need for a programmatic assistant in 15:1 classes would strengthen instruction and reduce need for a smaller student-teacher ratio.
- 11) Schools of Choice. Consider issues of school choice for students with IEPs in specialized classes.
- 12) Equitable Distribution of Classes. Consider how specialized classes are to be equitably distributed (across all schools, within school status categories and among feeder patterns), allowing for maximum continuity in schools from year to year and distance from home schools.
- 13) Placement Process. Consider how the district will communicate with school personnel and parents, and arrange for appropriate materials, etc.
- 14) Administrative Input. Clarify procedures for discussions between school personnel and special education administrators for potentially more restrictive student placements and/or personal assistants. Indicate that it is appropriate to informally discuss issues such as teaching methodology, coordination of services, or to develop a proposal or response to a parent proposal that may be handled at a later meeting. Expedite communications of these procedures with school-based personnel. Emphasize that decisions made by CSE and annual review teams should be based on information discussed at the meetings and should always include meaningful parent participation. 65
- d. Implementation Considerations. To implement these standards and expectations, have the leadership team discuss the following areas (and others as identified), document their conclusions, and develop worksheets as necessary to support implementation for individual students, groups of students, and schools:
 - 1) **Determining Interventions.** Establish decision rules to ascertain from a student's learning profile the type of intervention he or she needs, its intensity, and the basis for exiting the intervention.

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⁶⁵ 34 C.F.R. §300.501(b)(3).

- 2) *Flexible Groupings*. Define how students may be grouped more flexibly for parts of the school day with students from other classes (including students without IEPs) when they have common instructional needs.
- 3) Significant Class Diversity. Contemplate the district's options for instructing students in self-contained classes with more than one grade level and with students who have significant differences in reading/math levels.
- 4) Scheduling Interventions. Schedule collaborative planning between teachers and related services personnel.
- 5) Overage Classes. Determine a process for opening new classes when needed to reduce or avoid classes that are over the state limit.
- 6) Extended School Year. Have administrators responsible for summer school and extended school year services (including security, food, janitorial, etc.) collaborate on how to reduce costs by maximizing the use of common school sites and services.
- 7) District/Agency School Partnerships. With private school administrators who are interested in collaborating to support BPS students, consider options for district/agency partnerships.
- 8) **Professional Development.** Define what standards and expectations for professional development need to be developed and implemented.
- e. Exemplary Special Class Implementation Models. Based on student outcomes, identify and share models of exemplary special classes, including those involving ELLs with IEPs. Enable staff to visit the schools, and identify staff members who reflect these standards and who could provide training to their peers.
- *f. Evaluation of Effectiveness.* Evaluate the effectiveness of program implementation with activities that include the following:
 - 1) Baseline Data. Establish baseline data on current instructional practices and outcomes. Use the Office of Shared Accountability report on elementary schools that included student achievement data by special education service model as a template to report comparable data for high schools. Ensure that all self-contained models are included. Cross reference with Recommendation 5g(1).
 - 2) Data and Reports. With a collaborative group of central office and school-based staff, expand the data and reports mentioned in Recommendations 2f and 4g to include information on use of academic and behavioral interventions for students with IEPs in separate classes, monitor progress, and summarize data by groups and combinations of groups, e.g., schools, grades, ELLs with IEPs, etc.
- g. Walk-Throughs. In addition to the use of data reports referenced in Recommendation 4f, modify walk-through protocols and checklists to reflect expected standards and practices.
- 6. Reduce out-of-school suspensions for students with disabilities. Recommendations 2 through 5 include activities related to the provision of interventions/support for academic achievement and positive behavior to reduce out-of-school suspensions. In addition, consider the following:

- e. Balanced and Restorative Justice. Review research on the use of balanced and restorative justice sponsored by the U.S. Department of Justice and successfully used in other school districts.⁶⁶
- f. In-school Suspension. Review research on the configuration and parameters around effective in-school suspension alternatives and determine how district schools would be able to implement these options, including how to continue the provision of instruction and other IEP-required services.
- g. Data Collection. Produce <u>accurate</u> data reports showing students with IEPs by varying number of in-school and out-of-school suspension days by day ranges, e.g., 0 to 5, 5 to 10, and over 10. Along with these numbers, include measures supporting comparisons between students with/without IEPs, and with IEPs by race/ethnicity, and by grade.
- h. Disparity Measures. Develop measures to track disparities, especially when there are small numbers of suspended students. Collaborate with BPS personnel knowledgeable about measurement and statistics.
- *i. Monitor Outliers*. Based on established disparity measures, have each school leadership chief (in collaboration with the special education office and others responsible for achievement/behavior of students with IEPs) review the instruction/interventions and supports provided at each school and initiate follow-up training and assistance if patterns warrant. Establish a process for regular reporting to the leadership team.
- *j. Transportation to Alternative Schools.* With legal counsel, review the U.S. Department of Education's guidance on the district's obligations to transport students when this service is listed on their IEPs. ⁶⁷
- 7. *Improve postsecondary transition outcomes, and services and activities.* Consider the following actions to improve postsecondary transitions for students with IEPs.
 - a. Students Not "On Track' to Graduate. With the leadership team, initiate a strategy to identify and support all ninth grade students who are "not on track" to graduate, and define "not on track" as students entering high school two or more years below grade level: 68
 - 1) Data. Identify ninth grade students who are not likely to accumulate at least five semester-long credits, are likely to fail more than two core courses during the freshman year, and/or have disproportionately high absentee rates.
 - 2) *Interventions*. Identify and implement research-based strategies for each student not on track, e.g., mentoring, research-based interventions, and other supports likely to reverse the student's performance trends. Have principals of schools with high dropout rates (and their feeder schools) work with stakeholder groups to develop targeted plans.⁶⁹

⁶⁶ http://www.ojjdp.gov/pubs/implementing/contents.html

⁶⁷ Questions and Answers on Serving Children with Disabilities Eligible for Transportation November 2009, H-1, at http://idea.ed.gov/explore/view/p/,root,dynamic,QaCorner,12; see also C.G. vs. Henderson County Board of Education, Tennessee Department of Education (2003).

⁶⁸ Based on December 2009 report, *What Matters for Staying On-Track and Graduating in Chicago Public Schools:* A Focus on Students with Disabilities, by the University of Chicago Consortium on Chicago School Research and the National High School Center at http://ccsr.uchicago.edu/content/publications.php?pub_id=137.

⁶⁹ See the National Dropout Prevention Center for Students with Disabilities website at http://www.ndpc-sd.org/ for suggestions on research-based practices.

- 3) Credit Recovery. Provide credit recovery assistance to students with IEPs, along with other IEP-required special education services and other supplemental aids.
- b. Postsecondary Transition Plan. With representatives of the leadership team and others knowledgeable about transition services and activities, develop a systemwide plan to increase the effectiveness of postsecondary transitions for all students with IEPs. Include ways to increase community-based training with job support, especially for those students who are unlikely to be employed after their schooling. Address the effective use of interest assessments, and design activities (like dropout/credit recovery) to reduce the number of students with IEPs who drop out of school.
 - 1) Access to Community-Based Job Sites. As part of the planning process, review research showing that quality work-based learning experiences include the following:
 - Experiences that provide exposure to a wide range of work sites in order to help youth make informed choices about career selections.
 - Experiences that are age and stage appropriate, ranging from site visits and tours to job shadowing, internships (unpaid and paid), and paid work experience.
 - Work-site learning that is structured and links back to classroom instruction.
 - A trained mentor that helps structure the learning at the worksite.
 - Periodic assessment and feedback that is built into the training.
 - Youth who are fully involved in choosing and structuring their experiences.
 - Outcomes that are clear and measurable. 70

Based on this research, review the extent to which all students with IEPs who are not likely to graduate with a regular diploma have access to work-related activities consistent with the above criteria, and follow up with planning to address these students' needs. Communicate with and meet with interested parents about changes to the IEP diploma and the impact of those changes on students. In addition, consider access to transportation and supports of job coaches.

- 2) Student-directed IEP Meetings. Consider the use of student-directed IEP meetings to facilitate independent functioning and self-advocacy skills among high school students. See Student-Led IEPs: How to Make it Work⁷¹
- 3) *Tracking Students Post-School Outcomes*. Students, including those with IEPs, should be aggressively tracked through surveys after six months out of school, using a variety of response-inducing strategies. Review these data and disaggregate them by school to guide future transition planning.

Additional recommendations on transition services and web-based access to information about transition are provided in the next subsection, IV. Support for Teaching and Learning.

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⁷⁰ Work-Based Learning Jump Start, National Collaborative on Workforce and Disability for Youth. Retrieved from at http://www.ncwd-youth.info/work-based-learning.

⁷¹www.ncset.org/institutes/proceedings/2002_01_23.pdf

IV. Support for Teaching and Learning for Students with IEPs

This section summarizes BPS's support for the teaching and learning of students with IEPs. Although the phrase "It takes a village" may be overused, it suitably applies to school systems and schools with respect to the collaboration that is needed to support students with disabilities, most of whom are educated in regular classes for some or most of the school day. In addition, information is provided in this section on the administration of special education and related services at the school level. Finally, this section covers: school accountability measures, personnel performance evaluations, data reports, procedural manuals for CSE and Section 504/ADA, IEPs and the IEP system, requests for due process hearings, parental involvement, and the BPS website.

Central-Office Organization

According to the district's organizational chart provided to the Council team by BPS personnel, the chief financial officer/chief operating officer, general counsel, and deputy superintendent positions report directly to the superintendent. The deputy superintendent's position was recently filled on an interim basis. Four school leadership chiefs report to the deputy superintendent, along with the five chiefs for curriculum, assessment and instruction, student support, strategic alignment and innovation, technology, and talent management.

School Leadership Chiefs

Each of the four school leadership chiefs has oversight responsibility for 15 to 16 schools. The schools are not arranged by geographic zones or by grade level, but they include a combination of priority, focus, and in-good-standing elementary and secondary-grade schools. The chiefs are charged with increasing achievement and conducting principal evaluations. Priority activities include monitoring data-driven instruction, ensuring principals engage in common planning time with staff, and participating in classroom walk-throughs. Each chief has a part-time supervising principal as well as an instructional specialist and a director that coordinates with staff from other central-office departments, including the special education office. Also, each chief has four full-time instructional coaches who support the school-based coaches. As discussed below, each chief does not have access to a designated special education administrator to collaborate on special education instructional and operational issues for each set of schools.

Curriculum, Assessment, and Instruction

One assistant superintendent for curriculum, assessment, and leadership development reports to the CAI chief position, which is vacant. In addition, one of the two assistant superintendent positions is still unfilled. With no obvious title or department name delineating areas of oversight, the two assistant superintendents are identified as Focus Areas 1 and 2.

- Focus Area 1. This vacant assistant superintendent position has 12 direct reports and direct oversight responsibility for core and non-core curricular areas. In addition, supervisors for early childhood and professional development report to this assistant superintendent.
- Focus Area 2. The second, assistant superintendent position has responsibility for seven diverse areas: special education, athletics, multilingual education, adult and alternative education, career and technology, federal programs, and grants procurement. In addition, the

assistant superintendent has been assuming some of the responsibilities for the vacant CAI chief position. The area of special education has three directors reporting to the assistant superintendent; and one of the director positions is vacant. Prior to the introduction of the current organizational structure, responsibilities of the student support services chief included special education. The current organizational structure places the assistant superintendent one level away from the superintendent's cabinet, and the two special education directors are two levels away from the cabinet.

According to several district leaders, the assistant superintendent of focus area 2 has been well received, and special education is now being viewed more proactively than reactively. The assistant superintendent is asking critical questions and working with her staff to think about their roles differently. However, given her responsibilities, the assistant superintendent has significant priorities that compete with the effective administration and operation of special education. It is inconceivable that the assistant superintendent is able to devote the time necessary for effective leadership in this area.

Special Education

As mentioned above, there are three special education director positions, including one that is vacant. Responsibilities that were under the vacant position have been shifted to the other director. One director supports instruction/ behavior and the other supports the CSE, placement, and other functions. In addition, there are two administrators that spend part of their time supporting special education: the Occupational Training Center principal, and the revenue enhancement director. There is no centralized support for school-based psychologists or social workers other than several chairpersons who take the lead in organizational meetings. As discussed below, the revenue enhancement director supports speech language pathologists.

Instruction/Behavior Classroom Support

The director and two supervisors are expected to support the district's 58 schools in the area of instruction and behavior, including the unique instructional needs of ELLs with disabilities. Two secretaries, including one who works half time for the unit and half time for the director of revenue enhancement, supports the unit. Although the Council team was told that one of the supervisors focuses on reading and the other on behavioral supports, the responsibilities of all three administrators are varied. For example, although talent management is responsible for general education teacher and paraeducator positions, the instruction/behavior unit is responsible for filling all special education teacher positions. This responsibility takes a significant amount of time. Additional responsibilities include

- Attending meetings,
- Participating in the diagnostic tool for school district effectiveness (DTSDE) school review process,
- Coaching to teachers and participating in instructional rounds with school leadership chiefs,
- Observing teachers, including guided observations, and assistance with Teacher Improvement Plans (TIPs),
- Monitoring individual personal-care aids, including developing justifications for recommendations,

- Facilitating staffing for classes each spring,
- Leading professional development for such areas as ICT,
- Attending special education-related meetings in Albany,
- Assisting principals with formal and informal APPRs, including some for charter schools for special educators, and
- Assisting the revenue enhancement director in overseeing the operation of the extended school year.

The director and two supervisors do not have a consistent set of schools to support. Instead, each responds to school requests as needed. The support available to schools is viewed as insufficient and was described by interviewees as a "band aid." Focus group participants indicated that they would like the administrators to provide stronger support for schools and to communicate in person rather than via telephone. There was a strong interest in having a sufficient number of administrators so they could be aligned with a school leadership chief and his/her cohort of schools. This model would enable each administrator and chief to collaborate, identify trends in data, provide more proactive assistance, and provide more consistent and meaningful communications.⁷² In addition, this collaboration would address the concern shared by focus group participants that bureaucratic protocols sometimes interfere with active discussion between administrators and principals who do not view administrators as having a "like rank."

CSE/Placement Support

The director of CSE support, one supervisor, and district CSE personnel are housed at School 12, which is located apart from administrators providing instruction/behavior support. The CSE director primarily communicates with school leadership chiefs and principals through emails and telephone calls. This director and supervisor have responsibility for about 50 individuals who work in the following areas: charter/nonpublic CSEs, preschool CSE/placement, agency CSE/placement, specialized class placement, bilingual, due process/complaints, data coordination, and grants. The director and supervisor work jointly to manage all areas under their purview, making it somewhat unclear where their lines of responsibility begin and end. In addition, several other staff members report to the director. Information about each of these areas is provided below.

- Charter and Non-Public Schools. Three CSE chairpersons, three psychologists, and two social workers are responsible for processing and conducting assessments for all initial referrals, reevaluations, annual reviews, and IEP amendment meetings. In addition, one speech/language pathologist provides support for students in charter, non-public, and agency schools. There are about 987 students with IEPs in 16 charter schools and about 165 students in 21 non-public schools. The chairpersons create agendas, develop and finalize IEPs, communicate with parents and school staff, etc. Staff report having difficulty keeping up with the work requirements relating to the number of students being served.
- Agency School CSE/Placements. The unit that supports students placed by the district in agency schools is staffed by three CSE chairpersons, two psychologists, two bilingual psychologists, one speech therapist, and one bilingual social worker. There are approximately

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⁷² This issue appears to be similar for the area of multilingual education.

925 students with IEPs who attend 12 agencies. In addition to regular CSE duties, the chairpersons facilitate initial meetings for students placed with an agency, communicate with parents of students transferring from other districts, manage parent complaints, and work closely with agencies for upcoming meetings, etc.

- **Preschool CSE/services:** In addition to typical CSE duties, six preschool CSE chairpersons identify therapists to provide services for children pursuant to their IEPs. Currently, there are about 1,402 preschoolers who were born in 2009, 2010, or 2011 receiving services. As of the end of January 2014 there were more preschool evaluations for the school year than in the entire 2012-13 school year. The unit has one vacant clerical position. Because services are dependent on data entry for children and their service needs, this vacancy poses a serious problem.
- Specialized Class Placement. Three placement CSE chairpersons are responsible for the following: placing students needing self-contained classes, monitoring self-contained class overages, "moving up" students for the new school year, projecting self-contained class needs for each new school year, registering new BPS students, communicating with parents, etc. Interviewees had various concerns about the placement process. The unit receives about one to four requests for placements daily, but staff members do not maintain a log of placement requests.
- *Bilingual CSEs.* Two bilingual psychologists are responsible for all bilingual evaluations for students in charter, non-public, and agency schools. In addition, these psychologists work to transition preschoolers and BPS students attending schools other than the six that have high bilingual populations and that have other bilingual CSE supports. One bilingual social worker also provides support.
- District Team. The district team has two CSE chairpersons and a psychologist who handle
 requests for due-process hearings by coordinating teachers, parents, administrators, attorneys,
 etc. They are responsible for resolving concerns, working with hearing officers, facilitating
 settlements, etc.
- Quality Assurance. Another CSE chair is responsible for quality assurance by developing
 and distributing policies and procedures, training new CSE chairpersons, monitoring
 compliance with CSE processes at schools that do not have a CSE chair due to retirement or
 leave, and working with CSE teams/administrators to ensure timely evaluations and CSE
 meetings.
- **Data Coordinators.** One data coordinator is responsible for providing mandatory special education data to NYSED, correcting data errors, producing compliance reports, etc. A second data-coordinator position has been vacant for over a year.
- PBIS Coaches and Behavior Specialists. Two PBIS coordinators, who also serve as
 external coaches, and three additional coaches, who are Board of Cooperative Education
 Services (BOCES) employees, report to the director. In addition, three behavior specialists
 report to the student support services chief and the unit director.
- Special Education School Improvement Specialists. Three SESIS provide services through a state grant for quality improvement in schools identified as not making AYP on state assessments because of low results by students with IEPs.

Revenue Enhancement

As of the Council team's visit, the revenue-enhancement director oversees the district's Medicaid billing program, as well as speech/language services, occupational therapy, physical therapy, ESY, assistive technology, Section 504, and hearing/vision. The director also heads West New York coordinating activities for Medicaid. The director has been involved with Medicaid activities for 22 years and took over supervision of related services when another employee retired. Recently, the director was given additional responsibility for ESY.

As shown on the district's special education organization chart that was provided and explained to the Council team, the revenue-enhancement director reports part-time to the curriculum, assessment and leadership development assistant superintendent who oversees special education and part-time to the chief financial officer/chief operating officer (CFO/COO). During the revenue-enhancement director's conversation with the Council team, it was evident that the reporting structure was not clear to all parties. The revenue-enhancement director believed she was to report full-time to the CFO/COO, whereas the assistant superintendent that oversaw special education at the time believed that the director reported to both the CFO/COO and herself. The Council team was informed that parties were meeting to discuss and resolve the reporting confusion. Also, the revenue-enhancement director and the special education directors coordinate with each other only minimally.

Physical/Occupational Therapy. A physical therapy/occupational therapy (PT/OT) coordinator facilitates services mostly through contractual agencies. This process has been in place for some time. Although it is believed that it is a cost-effective practice, there has not been a recent cost-benefit analysis. The agencies conduct PT evaluations, which are reviewed by the PT coordinator. With seven OTs, five conduct evaluations and two provide services.

- *Speech/Language Pathologists*. Most of speech/language pathologists are licensed with master's degrees; while those who are not can provide therapy, the district cannot request Medicaid billing for their services.
- *Hearing/Vision Teachers*. These teachers typically instruct students using an itinerant model, but a few of these students are in self-contained classes. Some of these teachers serve as sign-language interpreters.
- Medicaid Reimbursement. Two coordinators support activities designed to maximize compliant Medicaid billing, which includes billing for students in charter and non-public schools. The district was found to be compliant on a recent Medicaid audit based on 100 randomly selected files. Parental consent for billing Medicaid is requested for all students, including new students so that consents are in place for students newly identified as needing special education services.
- *ESY*. Administration of the extended school year program includes all relevant activities, such as staffing, school identification, assigning aides, arranging lunches, transportation, related services, etc.

Transition Support

In addition to his oversight of the Occupational Training Center (OTC), the center's principal is responsible for 6:1:1 NYS Alternative Assessment classes, the Unique Learning curriculum, and the New York State Alternate Assessment. In the absence of a districtwide

coordinator of postsecondary transition services and activities, many staff members consider him to be the default administrator. He also is considered to be the default transition administrator. Information about various aspects of the postsecondary transition is on the OTC website rather than on the district's special education department webpage.

School-based Support for Students with IEPs

In various ways, school-based personnel support the CSE process and specialized instruction and related services for students with IEPs. The organization of these employees, their ratio to students with IEPs, and their professional development are discussed below.

CSE Operation

The CSE function was decentralized a few years ago, and CSE chairpersons, psychologists, and social workers were relocated from a centralized location to schools. CSE personnel now report to and are evaluated by school principals. The change was initiated to facilitate a closer relationship between schools and these employees, and was completed at the end of 2008-09. However, district leaders had a change in attitude over the last several years that resulted in teachers, administrators, and district officials taking greater responsibility for students with disabilities. They attributed this change, in part, to the decentralized CSE model. However, there was also concern that related-services staff were asked to serve other functions during the school day that took them away from their primary duties.

Currently, the same individual chairs the SST and the CSE. There was significant concern that the SST and CSE processes are less effective when chaired in this manner. Reportedly, there are plans in place to separate the chair functions of these two processes and to have a minimum ratio for the SST chair in the upcoming school year. There is a document that shows allocations for SST chairpersons, which are based on the number of students with disabilities enrolled in a school. However, the allocation refers to the SST function in a way that includes the CSE function.

CSE Clerk Typists

CSE clerk typists who had supported about two schools each now support about four schools each. In the past, these employees were housed at the schools they served, but they no longer travel to schools. As a result, there is a very cumbersome process in place for getting information to the typists, and there is a belief that the work has slowed down considerably. Furthermore, there is an overly complicated process for obtaining postage from School 12 to mail information to parents. It does not appear that the structure in place was meant to support the processing of CSE materials; nor does it appear that coordinating CSE functions is organized for maximum effectiveness.

Special Education Teacher and Paraeducator Staffing Ratios

BPS student-to-special education teacher and paraeducator ratios are compared below to data from 59 other mostly urban school districts.⁷³ (See Exhibit 4a.) The data do not give precise comparisons, so the results need to be used with caution. District data are not uniform (e.g.,

⁷³ Most of the data were provided by school districts that responded to a survey conducted by the Urban Special Education Leadership Collaborative; the Council team or members of the team obtained the remaining data during district reviews.

including or excluding contractual personnel) and are affected by varying levels of placements in and outside of a school district. The data include all students with IEPs, including those placed in charters, agencies, and non-public schools. Because of this, the ratios for students with IEPs in BPS schools are likely to be lower than those reported. However, these data are the best available and are useful as a rough guide to staffing ratios. Appendix A has detailed data on each school district.

BPS has an average of 10.3 students with IEPs (including those with speech/language impairments only) for every special educator. This average is 4.4 fewer students than the 14.7 teacher-student average for all districts for which we have data and ranks BPS as ninth among the districts. In comparison, with 439 paraprofessionals, BPS has an average of 17.6 students with IEPs for every paraprofessional. This is 2.3 students more than the 15.3-student average of all districts and ranks BPS as 41st among the reporting districts. Combining special educators and paraprofessionals, BPS's 6.5 students-to-staff ratio is lower than the 7.95 ratio among all districts.

Exhibit 4a. Average Number Students for Each Special Educator and Paraprofessionals

Areas of Comparison	Special Education Teachers Paraprofessionals		
Number of BPS Staff FTE	753	439	
BPS Student w/IEP-to-Staff Ratios	10.3:1	17.6:1	
All District Average Ratios	14.7:1	15.3:1	
Range of All District Ratios	7–37:1	5.26–56:1	
BPS Ranking Among Districts ⁷⁴	9 th of 59 districts 41 st of 59 districts		

Review of Need for Personal Assistance

A reported increase of about 15 paraprofessionals has coincided with the decentralization of CSEs. A request for a personal assistant must be submitted with supporting documentation at least two weeks prior to a CSE meeting. A special education supervisor reviews the request and discusses the circumstances with school personnel. The supervisor observes the student to see if there is a behavioral basis for the request and reviews medical documentation for a physical basis for the request. For these requests and in instances when a student transfers into BPS with an IEP that requires an assistant, the supervisor forwards the request to the assistant superintendent for consideration and follow-up processing.

Use of Paraprofessionals

The following concerns relate to the use of paraprofessionals:

- *Two Position Types*. There are two positions for paraprofessionals (aide and assistant), which separate instructional support from personal care. This bifurcation of responsibilities is not effective or cost efficient.
- *Engagement*. Reportedly, paraprofessionals have been observed texting while sitting in the back of the classroom and not engaged with students.

⁷⁴ Ranking begins with districts having a low average number of students to one staff person.

- *Absences.* There are a relatively large number of paraprofessional absences. When substitute paraprofessionals are not available, substitute teachers have been used at a higher cost than a paraprofessional substitute would cost. The substitute teachers do not consistently attend to students' personal care or accompany them in the swimming pool.
- *More Adults to Students*. There have been classes with more adults than students. Reportedly, this has occurred when a student transfers in with an IEP requiring a personal paraprofessional.
- *Professional Development*. There was a strong need expressed among interviewees for professional development for paraprofessionals.

Psychologists, SLP, Social Work, OT and PT Ratios

Staffing ratios and other data on related-services personnel are summarized below and detailed in Exhibit 4b. The district did not submit data on nurses, who are provided through a contractual agency.

- Speech/Language Pathologist (SLP). With 109 speech/language pathologists (SLPs), there is one for an average of 71 students with IEPs. This average is less than the surveyed district average of 125 students, ranking BPS tenth among the 59 reporting districts.
- *Psychologists*. With 62 psychologists, there is one psychologist for an average of 155 students with IEPs, compared with the surveyed-district average of 186 students. With this average, BPS ranks 27th of the 49 reporting districts.
- *Social Workers.* With 48.5 psychologists, there is one psychologist for an average of 160 students with IEPs, compared with the surveyed-district average of 295 students. With this average, BPS ranks 23rd among the 37 reporting districts.
- Occupational Therapists (OT). With 75 OTs, there is one for an average of 103 students with IEPs, compared with the much higher district average of 406 students. BPS ranks third among the reporting 56 districts.
- *Physical Therapists (PT)*. With 29 PTs, there is one for an average of 267 students with IEPs, compared with the surveyed-district average of 1,079 students. BPS ranks 36th among the 56 reporting districts.

Exhibit 4b. Ratios of Students with IEPs to Staff for Related Service Providers

Related Service Areas	SLPs	Psychologists	Social Workers	OTs	PTs
Number of BPS Staff FTE	109	62	48.5	75	29
BPS Student w/IEP-to-Staff	71:1	155:1	160:1	103:1	267:1
All District Average Ratio	125:1	186:1	295:1	406:1	1079:1
Range of All District Ratios	26–596:1	31–376:1	26-673:1	64–1685:1	128-2941:1
BPS Ranking ⁷⁵	10 th of 59	27 th of 49	23 rd of 37	3rd of 56	36 th of 56

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⁷⁵ Ranking begins with districts having a low average number of students to one staff person.

Overall Rankings

Exhibit 5c shows the number of districts having greater or fewer students with IEPs per personnel in each relevant area, compared with BPS. These data shows the following.

- *Relatively High Ratios*. Of the districts reporting, 40 have more paraprofessionals per student than does BPS and 18 have fewer; 14 have more social workers and 23 have fewer, and 35 have more physical therapists and 20 have fewer.
- *Relatively Low Ratios*. Of the districts reporting, two have fewer occupational therapists per student than does BPS, and 53 have more; three have fewer special education teachers per student and 53 have more; 12 have fewer speech/language pathologists and 45 have more; and 18 have fewer psychologists and 32 have more.

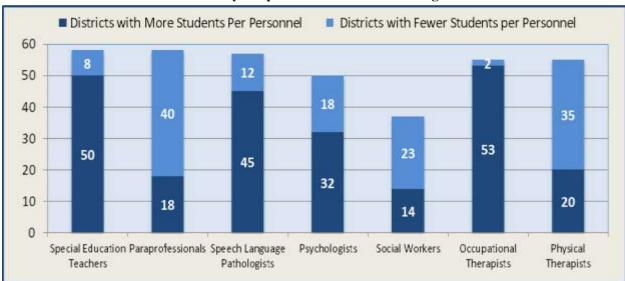


Exhibit 4c. Number of District Survey Respondents and BPS Ranking

Professional Development

Very little professional development or ongoing communication is available for psychologists and social workers. More is available for CSE chairpersons and speech/language pathologists.

- *CSE Chairpersons*. All CSE chairpersons meet monthly for a few hours. There was a request for minutes of the meetings so that chairpersons could share information with other school-based personnel.
- Psychologists. A psychology chairperson holds a monthly lunch meeting for psychologists.
 However, attendance has dropped to under 10 because principals do not always approve their release.
- *SLPs*. The revenue-enhancement director holds quarterly mandatory meetings with the speech/language pathologists.

In addition to the above, there is an opportunity for CSE chairpersons, SLPs, psychologists, and social workers to attend well-regarded district-sponsored workshops. Individual principals decide whether these personnel can take a "professional development" day

to attend outside training. In all cases, personnel pay for the training. Focus group participants indicated a need for additional professional development.

Personnel Shortages

Focus group participants told the Council team about substantial challenges hiring personnel in some areas like special education teachers, paraprofessionals, clerks, bilingual personnel, etc. However, the team understood that most special positions were filled. As discussed above, one of the special education directors, rather than talent management staff, oversees the hiring of special education personnel. Many believed that special education either ought to handle this hiring or have more input over it. There was also a strong belief that the district ought to collaborate more aggressively with Buffalo State College and its large special education teacher preparation program.

Additional Areas

The following additional areas are addressed below: school accountability measures, personnel-performance evaluations, data reports, procedural manuals for CSE and Section 504/ADA, IEPs and the IEP system, due process/complaints, parental involvement, and the BPS website.

School Accountability Measures

The data dashboard is a robust tool that includes some data that are disaggregated by subgroups, including special education. However, school accountability processes, including the dashboard, do not include such important elements as suspensions for subgroups of students with IEPs (or by race/ethnicity), significantly discrepant referrals for special education or for more restrictive settings or dropout recovery/rates.

Personnel Performance Evaluations

The following concerns were shared regarding the performance evaluation process:

- *Targets.* SLOs and LMAs for students with IEPs may be set too low so that targets can be met. There is a lack of clarity and consistency about how targets should be set and who has ultimate authority for establishing them (principal or teacher).
- *Clarity*. The way in which the combined efforts of ICT special/general educators are assessed is not clear.
- *Impact on Special Education*. There is the potential for increased referrals for special education evaluations and more restrictive placements as a way to reduce accountability for these students.
- **Related Services Personnel.** There is confusion about related-services personnel who are not evaluated under the 3012C legislation and the type of evaluations they are to receive. Their evaluation protocol is unclear, and there do not appear to be any plans in place to make it more effective.

Data Reports

Monthly reports containing special education data are distributed to various administrative groups and the Board of Education, and other reports are generated as requested. However, focus group participants reported that data are not easily accessed, and data are not regularly used to evaluate programs and supports in place for students with IEPs. The Council team also experienced difficulty in getting data on the timeliness of initial evaluations, reevaluations, and annual reviews for preschool and school-aged students. In addition, two suspension reports had inconsistent data. Also, there does not appear to be a centralized or coordinated administrative approach to responding quickly to special education data requests. Instead, data are collected from multiple sources in different parts of the central office organization and are not uniformly reported.

CSE Guide

The CSE Guide provided a great deal of useful information to the CSE team. The Guide states that it should not be construed as complete. Interested parties seeking additional information are provided a link to the full regulations of the Commissioner of Education Part 200 and 201. Focus group participants described written guidance as a large binder that is not comprehensive and said that the referral process differs from school to school, e.g., responsible individuals and time frames. In addition, the district has an Annual Review Manual. Neither the CSE Guide nor the Annual Review Manual is posted on the district's website.

Section 504/ADA Team Manual

The district revised its Section 504/ADA Team Manual in February 2011. Based on a quick review of the document, the following important provisions from the 2008 ADA amendments were not included:

- *Major Life Activities*. New major life activities pertaining to concentrating, thinking and reading. These areas are especially relevant to students.
- **Substantial Limitation.** The determination of a student's physical or mental impairment's substantial limitation on a major life activity must occur without regard to any mitigating effects such as medication.

IEPs and IEP System

Focus group participants shared the following issues about IEPs and the IEP system.

- *IEP Summary*. The IEP system does not produce an IEP summary, a document that would provide the most relevant information for general educators and other relevant staff. Many other districts have an IEP system that generates such summaries without additional data input. These districts have found the summary to be useful to staff.
- March Annual Reviews. CSE teams have meetings to develop annual reviews only during the month of March. Various focus group participants described the challenges involved in drafting IEPs for all students on their caseloads at one time, and holding so many meetings (in addition to other CSE and other responsibilities) in such a short period. For example, one participant was told that she had two school days in which to write 15 IEPs and hold all required meetings. Reportedly, these meetings were held on a staggered basis in the past. Although many other districts hold annual review meetings by the IEP anniversary date,

these dates would all be in March (except for transfer students) because of the district's practice.

• *Training*. There is concern that IEP requirements change frequently, but there is not sufficient training to communicate the changes.

Due Process Hearing Requests

The district has a process that provides for a CSE appeal, which gives parents and the district an opportunity to resolve issues. The number of due-process hearing requests has decreased over the last few years. Last school year there were 17 requests, which was a smaller number than the 41 from prior years. Parent-attorney fees have been reasonable, and settlements have included related services, home instruction, and independent evaluations. None of the cases required the district to reimburse a parent for a private placement. The district has an attorney who is extremely knowledgeable about special education. The Council team was informed that the attorney should be able to continue addressing these issues in his new role as labor relation's director.

Parent Involvement

BPS has a strong and knowledgeable Special Education Parent Advisory Committee (SEPAC), District Parent Coordinating Council (DPCC), and Multilingual Education Advisory Council (MEAC). However, there is a strong parental belief that district information is not readily shared with them and that their partnership with the district could be stronger and less antagonistic. For example, although Buffalo State University has a homework center for children and parents, the information has not been communicated widely. It is believed that stronger district/parent collaboration could strengthen communications generally, especially for parents who are English language learners. Although the Council team did not include all the recommendations submitted by SEPAC in this report, many of them were incorporated and they generally appeared to be thoughtful and helpful.

In addition, there are concerns that there were not sufficient translation services for parents. Reportedly, the district's use of contractual services for translations is inadequate to meet the language/cultural needs of parents.

BPS Website

The BPS website includes a small amount of information relevant to special education for district staff, parents, and the community. For example, the special education webpage does not include current contact information or links to publicly available information and resources.

AREAS OF STRENGTH

The team noted the following areas of strength with respect to BPS's support of teaching and learning of students with IEPs.

- *Communication*. There are monthly meetings with district leaders responsible for supporting schools and the academic achievement of students, including meetings of the principals and directors of special education.
- Strong Administrative Team. The expertise and temperament of the assistant superintendent who has oversight for special education appear to be well suited for implementing necessary

special education changes. She recognizes many of the issues and challenges facing the department and special education across the district. In addition, the 5.5 special education administrators, including the two directors, who have responsibilities of an unusually large scale with minimal support take their roles seriously and are held in high regard.

- CSE and SST Functions. The CSE function was decentralized a few years ago and the chairpersons and members are no longer housed centrally. Instead, they are housed at schools with principal oversight. The CSE chairs meet monthly, and the speech/language pathologists meet quarterly. Plans are in place to separate the SST and CSE processes and their chairperson roles. However, staff allocations and roles are not yet clear. There is an opportunity for CSE chairpersons, SLPs, psychologists, and social workers to attend well-regarded district-sponsored workshops.
- Student to Specialized-Personnel Ratios. Overall, it appears that the district has staff ratios in most areas that exceed or are near ratios of the districts for which we have data. BPS's 6.5 ratio of students to special educators and paraeducators combined is smaller than the 7.95 ratio for all other districts surveyed. The district's ratio is based on lower student-to-special educator ratios rather than paraprofessional ratios, which reflects an emphasis on staffing with more qualified personnel. Compared to all districts with comparable data, the ratio is especially low for occupational therapists, and is somewhat lower for speech/language pathologists and psychologists. The ratios are higher for social workers and physical therapists.
- Access to Data. The district has a robust data dashboard with some data sorted by subgroups, including special education. This has supported more data-driven decision making. Monthly reports with special education data are distributed to various administrative groups and the Board of Education, and other reports are generated as requested.
- **Teacher Evaluations.** In alignment with the 3012C legislation, teacher evaluations are now more comprehensive, and they better reflect instructional practices and student outcomes.
- Written Guidance. The CSE Guide and Section 504/ADA Team Manual provide useful information to CSE and Section 504 teams.
- CSE Appeal Process and Due Process. The district has a CSE appeal process that enables
 parents to resolve issues prior to requesting a due-process hearing, and the number of due
 process hearing requests has decreased over the last few years. The district's knowledgeable
 special education attorney is likely to continue to support the district in his new role as labor
 relations director.
- Parent Involvement. BPS has a strong and knowledgeable Special Education Parent Advisory Committee (SEPAC), District Parent Coordinating Council (DPCC), and Multilingual Education Advisory Council (MEAC). Although the Council team did not include all of recommendations submitted by SEPAC in this report, the recommendations were thoughtful and helpful.
- Medicaid. The district was found to be compliant on a recent Medicaid audit based on 100 randomly selected files. Parental consent for billing Medicaid is requested for all students, including new students so that consents are in place for students newly identified as needing special education services.

OPPORTUNITIES FOR IMPROVEMENT

The following areas offer opportunities for improvement.

Central Office Collaboration and Support

- CAI Chief and Assistant Superintendents. On the district's organizational chart, the CAI chief has two assistant superintendents for curriculum, assessment, and leadership development but no apparent name for their respective offices, which makes it difficult to refer to their areas of responsibility. (One assistant superintendent position is vacant.) Although the current assistant superintendent has responsibility for all special education functions, she is responsible for six other diverse areas with significant priorities competing with her effective oversight of special education. She has also assumed various duties of the vacant CAI chief position. It is inconceivable that the assistant superintendent is able to devote the time necessary to exercise effective leadership in each area of responsibility. Furthermore, the assistant superintendent does not sit on the superintendent's cabinet, and it is difficult to understand how the CAI chief (when filled) can be cognizant of and able to represent fully all relevant issues at cabinet meetings.
- Special Education Organization. Special education functions are neither staffed nor organized in a manner that enables them to be executed efficiently and effectively. The situation is exacerbated further by a vacant special education director position. Only 5.5 administrators directly oversee day-to-day special education operations for BPS, which includes a multitude of responsibilities for students with IEPs residing in Buffalo who are in charter schools, placed by their parents in nonpublic schools, and placed by BPS in agency schools.

The administration of special education is distributed across four organizational units (instruction/behavior support, CSE/placement, revenue enhancement, and the OTC principal) and there is no sense of cohesion. Critical areas lack necessary and structured central-office collaboration and support for policy development, procedures, quality review, technical assistance, and operational support. Areas include services for students with autism, instruction for dual-identified students (ELL/IEP), postsecondary transition, interpreter services, psychologists, social workers, etc.

• Director/Supervisors for Special Education Instruction/Classroom Behavior Support. The director and two supervisors of special education who provide instructional/ behavior support to schools are not aligned to the four chiefs of schools, so they are unable conveniently to collaborate, plan, and discuss special education issues relevant to the schools for which each chief is responsible. In addition to its multiple responsibilities, the unit is charged with staffing special education teacher positions.

Assisted only by a part-time secretary, special education administrators do not support any defined set of schools. Furthermore, rules for communications sometimes interfere with active discussions between administrators and principals, who do not view administrators as having "like rank." These conditions result in a reactive mode of operation. A small amount of time is available to devote to instructional supports, including the need to expand capability to educate students directly rather than relying on agency placements. Separated from this unit is the OTC principal who has programmatic responsibility districtwide for the NYS Alternative Assessment classes, the Unique Learning curriculum, the New York State

Alternate Assessment, and is considered by some to the default administrator for postsecondary transitions.

- Director/Supervisor for District CSE/Placement. Only one director and one supervisor oversee about 50 centralized personnel responsible for: charter/nonpublic CSEs, preschool CSE/placements, agency CSE/placement, specialized class placement, bilingual, due process/complaints, data coordination, and grants. Three individuals staff the specialized class placement unit, which is not connected to the director and two supervisors of instruction. They are housed in a separate facility, away from the director/supervisors for special education instruction/behavior. This results in marginal interaction and collaboration between the two units on such issues as specialized placements, supports for positive behavior, instruction, etc. Staff members do communicate by telephone and email but they cannot do so as well as if in person when they are housed in different sites and must address issues on their own rather than jointly. The CSE centralized function appears to be understaffed, especially with vacant clerical and data coordinator positions, and it is having difficulty keeping up with timely evaluations, particularly for preschoolers who reached last year's total referral numbers by January of the current school year.
- Revenue Enhancement Director. The revenue-enhancement director has responsibilities that include finance (Medicaid reimbursement), special education/related services (speech/language services, occupational therapy, physical therapy, ESY, assistive technology, and hearing/vision), and Section 504. The reporting line for the director is unclear (to the CFO/COO alone or 50/50 with the CFO and the curriculum, instruction, and leadership development assistant superintendent). There is no apparent regular collaboration, planning, or structured communication among all of the special education directors, the revenue-enhancement director, and their supervisors. All PT (evaluation and service) and OT service personnel are contractual by design. However, there has been no recent cost-benefit analysis to support the efficiency and cost effectiveness of this service model. The district is unable to submit billing for some speech/language pathologists, because they are not appropriately licensed for Medicaid, and there are some concerns that billing is not possible for all social workers.

School-based Operations

• CSE Operation. It does not appear that the process for handling CSE materials and coordinating CSE functions is organized for maximum effectiveness. Many are concerned that principal supervision of CSE team members sometimes influences their decision-making, particularly with respect to decisions on eligibility and placement in restrictive settings and duties that may interfere with regular responsibilities. Although the district intends to have separate chairpersons for CSE and SST next school year, allocations for separate positions have not yet been made. Little communication or professional development is available for psychologists and social workers. There are regular meetings with speech/language pathologists; and although CSE chairpersons meet monthly, there is a need for written minutes to document communication for school-based personnel who were not at the meetings. CSE clerk typists who had supported about two schools now support about four schools each. There is also a very cumbersome process for getting information to those staff members and obtaining postage; there is a perception that work has slowed down considerably.

- Usage of Paraprofessionals. Although the ratio of one paraeducator to an average 17.6 students with IEPs is higher than the average of 15.3 students with IEPs among surveyed districts, there is some concern about oversight and accountability for determining the how many IEP-based assistants are needed. The number of such assistants has increased over time, and there are examples of classes with more adults than students. In addition, there are two paraprofessionals positions (instructional support and personal care). This structure is not effective or cost efficient because some students require both types of support that could be provided by one assistant. Also, there are times when more costly substitute teachers are used to replace less costly but absent paraprofessionals.
- *Personnel Recruitment*. There has not been a collaborative, cross-departmental approach to recruiting special education/related services personnel. There is also a districtwide need for additional bilingual staff.

Additional Areas

- **School Accountability Measures.** There is a need for data metrics that are disaggregated for the special education subgroup.
- **Personnel Performance Evaluations.** Guidance is needed for (1) setting appropriately rigorous SLO/LMA targets, assessing ICT teachers and related services personnel and (2) balancing increased referrals for special education services and more restrictive placements, along with personnel accountability for those placements.
- *Data Reports*. Data are not easily accessed or regularly used to evaluate programs and supports in place for students with IEPs.
- CSE Guide/Annual Review Manual. The CSE Guide does not include all information required for the administration and operation of special education and related services. Also, the Guide and Annual Review Manual are not easily accessible on the district's website for all district staff, parents, or other stakeholders. Nor does the website provide links to additional information and resources other than the full regulations.
- Section 504/ADA Team Manual. The document does not include all provisions relevant to the 2008 ADA Amendments that expanded school-district obligations under Section 504.
- *IEPs and IEP System*. The IEP system does not generate an IEP summary, which would provide the most relevant information for general educators and other staff. The district's practice of holding all annual IEP reviews in March creates a significant workload for personnel that affect instruction and other responsibilities.
- *IEP System Training*. Sufficient training is not provided to communicate IEP-system changes.
- **Parent Involvement.** There is a perception by parents that district personnel do not readily share relevant information, and that the parent/community partnership with the district could be stronger. It is believed that stronger collaboration of district/parent organizations could strengthen communication generally, especially for parents who are English language learners. Reportedly, the district's use of contractual services for translations is inadequate to meet the language or cultural needs of parents.
- **BPS** Website. BPS's website includes only a small amount of information on special education for district staff, parents, and the community.

RECOMMENDATIONS

The following recommendations are offered to improve services.

- 8. Improve support for teaching and learning of students with IEPs with the following measures.
 - e. Leadership. Create a leadership position that would prioritize and focus on the wide array of special education/related-services administrative and support responsibilities. Given the scope of these responsibilities, the individual assigned to this position should not be responsible for other priorities that would divert attention from the core special education work. Have the individual report directly to the chief of curriculum, assessment, and instruction, but also include him or her as part of the superintendent's cabinet and as a participant in meetings of the deputy superintendent to contribute special education issues that might not be otherwise considered.
 - f. Titles and Department Names. For clarity, differentiate the titles of the assistant superintendents and directors along with the departments they oversee so their roles and responsibilities are easier to recognize.
 - g. Special Education Organization. Charge three directors of special education with the responsibilities described below. Give them titles that reflect their responsibilities. If at all possible, house all personnel together in order to enhance their ability to communicate. (See Appendix A for proposed organizational chart.)
 - 1) Leadership Team Involvement and Planning Feedback. Charge the leadership team with planning and implementing a new special education organizational structure. Ensure the implementation plan includes feedback from school leadership chiefs, knowledgeable principals and school-based personnel from schools with differing grade levels, and parent representatives.
 - 2) Director for Instruction/Behavioral Support. Have this unit be responsible for supporting school-based instruction/interventions for students with IEPs and behavioral interventions for students with/without IEPs. Have at least one administrator assist the director in administering this unit, and assign at least one secretary/clerk to support the director and staff.
 - a) Four School Liaisons. Have four liaisons assigned to collaborate with the school leadership chief and his/her schools. This would enable each chief to have a single point of contact for special education and related issues, e.g., CSEs and placement, and to identify and address issues proactively. It is important for liaisons to have a manageable number of schools assigned to them, so that they are better able to provide the necessary supports. Additional roles might include making placement changes, participating in school reviews, and monitoring personal assistants.
 - b) Specialists. Have three specialists with skills in providing instruction/interventions and supports needed by students based on the learning profiles described in Recommendations 4b and 5b, and the provision of postsecondary transition services. Charge these specialists with building their familiarity and use of research on the most promising instructional approaches.

Have them assist school liaisons and school personnel as needed on such activities as observations, coaching, and professional development. In addition, have these specialists oversee alternate assessments, extended school programming, and Unique Learning System and other specialized interventions. Revise the number of specialists needed based on a detailed accounting of their roles and time required to meet their goals. In addition, house the SESIS with the specialists if the contract for their services is renewed. Have the SESIS participate in training on sharing instructional tools that would employ a common language and maximize available resources. Finally, include in this unit the hearing/vision teachers currently assigned to the revenue-enhancement director.

- c) Behavior Specialists. Consider housing the two PBIS coordinators, three coaches, and three behavior specialists in this unit. These employees are well established and are not viewed as solely "special education." Given the challenging behavior exhibited by some students with IEPs, their disproportionate suspension rates, and the race/ethnicity disparities articulated by the NYSED, having these behavior specialists assigned to this unit could help other special education administrators and schools through the use of PBIS. If a decision is made to group these staff members with other organizational units, ensure that staff members collaborate with special education personnel regularly in both structured and informal manners.
- d) BPS Placement Specialists. Have the three individuals currently responsible for placement report to the director for instruction/behavioral support in order to better coordinate these two related functions. Have placement personnel, liaisons, and other specialists collaborate on providing supports in circumstances where there is the potential that students might be removed from schools to a more restrictive environment or moved to a school with a less restrictive environment. Maintain a log of placements and track them for their timeliness and other issues, and monitor resolution.
- 3) Director for District CSE Support. Charge this unit with the responsibility of supporting all CSE personnel. With two administrators to assist the director, have them oversee the personnel discussed below. Identify data necessary to track CSE functions, and develop reports to assess practices, timeliness, and other issues.
 - a) Administrator for District CSEs. Have an administrator be responsible for districtwide CSE personnel for charter/nonpublic schools, agency schools, preschool, and bilingual staff. Have additional CSE personnel who are not assigned to one of these groups float among them to address unexpected increases in referrals and support appropriate screening activities and assessments. Expedite hiring of a clerk to fill the vacant position in order to support the entry of preschool data.
 - b) Administrator for School-based CSEs. Have an administrator be responsible for collaborating with the following CSE personnel: chairpersons, speech/language pathologists, psychologists, social workers, and physical/occupational therapists. Also, have this administrator collaborate with student services and nurses. (See Recommendation 1 on the separation of SST and CSE chairpersons.) Have the administrator collaborate with the four special education liaisons on

communicating on school-based issues and meet with various CSE personnel to facilitate research-based practices and obtain feedback on assessment and service issues. Consider providing stipends to several lead employees in each CSE personnel group with a large number of staff in order to improve practices and to support Medicaid billing and federal/state special education compliance. Have the results of meetings dealing with school-based procedures documented so they can be shared with school staff.

- 4) Director of Operations. Determine the reporting line for this director, and based on these responsibilities, determine the benefits of a continuing bifurcated reporting to finance and to special education. Primary reporting to the assistant superintendent of specialized instruction and support is preferred. Have at least one secretary/clerk support the director and staff. Have the director be responsible for the following areas.
 - a) Medicaid Reimbursement. Have the director brief the leadership team about issues affecting Medicaid reimbursement for speech/language pathologists and social workers to maximize billing and to support needed follow-up actions.
 - b) Quality Assurance. Consider expanding the unit by one or more individuals to support and monitor the implementation of school-based special education standards and practices. This group of personnel now monitors only the CSE function for quality.
 - c) Due Process District Team. Maintain this team as currently formed.
 - d) Data Coordinators. Fill the vacant data coordinator position. Use the coordinators to support the data-related work of the department and manage the data referenced in these recommendations.
 - e) Additional Functions. Consider having this unit and appropriate personnel assist with the management of the budget, grants, IEP system, and other operational processes. Ensure that current and new school-based personnel are provided sufficient IEP-system training on a continuing basis.
- 5) *Training*. Provide additional training necessary for each staff member to carry out his/her respective responsibilities.
- h. Communication with Schools. Establish standards and expectations for the above personnel to communicate with central office, school leadership chiefs, principals, and school-based staff in a way that would maximize feedback in a meaningful and not overly bureaucratic manner.
- 9. Ensure there are sufficient numbers/types of special education/related services personnel at schools and at the central office to support students with/without IEPs and to carry out essential functions.
 - e. Staffing Ratios Review. Consider bringing the following staffing ratios into greater alignment with other districts: (1) lower ratios for the combined numbers of special educators/paraeducators and for occupational therapists and (2) higher ratios of social workers and physical therapists. These ratios do not mean that these areas are not staffed appropriately. However, they deserve further review. As part of this process, consider the activities below.

- f. Special Education Positions. Given the very low achievement for students with IEPs, the Council cautions the district against reducing the overall number of special education positions in 2014-15. Recommendation 4 provides a process for reconfiguring services to individual schools next school year.
- **g.** *Paraprofessional Positions*. Consider having in place in the 2014-15 school year a single position for paraprofessionals, so one individual can provide both instructional support and personal care for students. The provision of services in both areas should not require the use of two different assistants.
- h. Related Services Criteria. Ensure that criteria for determining students' related-services needs are clearly articulated in writing and that they are applied as intended, especially for the area of occupational therapy.
- *i. Equitable Distribution.* Articulate clear standards for allocating special educators, paraprofessionals, and related-services personnel to schools and ensure that the standards are equitable and transparent.
- j. Clerk Typists. Charge the leadership team with considering whether the current use of clerk typists provides the best type of support. Consider possible alternatives to the position, including stipends for school-based personnel to carry out the responsibilities of clerk typists.
- **k.** *Filling Vacancies.* Investigate delays related to filling open vacancies when qualified individuals are available.
- *Monitoring.* Have the leadership team develop a process for monitoring implementation of the activities proposed in this report.
- 10. Communicate broadly with BPS personnel, parents, and the community about the special education process and resources to promote both student achievement and social/emotional well-being, and encourage meaningful parental participation.
 - a. Special Education Policies, Procedures and Practices. Expand upon the CSE Guide to develop a comprehensive, web-based compilation of all policies, procedures, standards, and expected practices on the administration and operation of special education/related services and the instruction of students with IEPs. Provide links to information on forms, publicly available resources, professional development materials, and training videos. Highlight information that would be of interest to parents, and provide the information in Spanish and other high-use languages. Provide differentiated training to all stakeholders on this information.
 - b. Section 504/ADA Team Manual. Expand Section 504/ADA of the Team Manual to include information on the 2008 ADA amendments, e.g., expanded list of major life activities, consideration of mitigating factors, and use of service animals. In addition, provide information on commonly raised issues, e.g., accommodations for allergies, diabetes, asthma, etc. Use a web-based platform to compile and disseminate the information, and include links to more detailed information and resources. Provide differentiated training to all stakeholders on the information.
 - c. *IEP Summary*. Consider developing an IEP summary that would be generated electronically. Ensure that the summaries have the type of information that is relevant to general educators and other personnel who do not need to have an entire IEP, and the type of information that parents would like to have in a shorter version.

- d. Parent Engagement. Leverage the current relationships with representatives of the Special Education Parent Advisory Committee (SEPAC), District Parent Coordinating Council (DPCC), and the Multilingual Education Advisory Council (MEAC) to create more effective ways of obtaining their regular input on (1) meaningful communications with parents, collaborative training activities, and (2) mechanisms to promote the effective involvement of parents in IEP/special education and instructional processes. Also, use their guidance in designing and building a special education webpage (Recommendation 10g).
- e. Union/Special Education Leadership Communication. Schedule regular meetings between representatives of the Buffalo Teachers Federation and the special education leadership to foster better communication on and resolutions of high-interest issues when possible.
- f. Communication. Use multiple methods of communicating the district's implementation of the recommendations in this report to the broader BPS community. Status reports and ongoing outcomes should be included.
- g. Webpage. Consider hiring a consultant to upgrade and maintain the district's webpage on special education. Post information relevant to BPS personnel, parents and the community, including such information as BPS contacts, manuals/guidance, postsecondary transition activities, links to training, and publicly available information. Consult with the leadership team and parent representatives on webpage information they would consider useful.
- h. Scheduling Annual Reviews. Reconsider the practice of having all annual review meetings in March. If it is preferable to have meetings throughout the year to facilitate parental involvement and/or alleviate personnel workloads, establish a mechanism for phasing in the meetings prior to due dates and phasing in annual review meetings throughout the year. In either case, establish a process by which current and prospective staff members communicate their expectations for the following school year.
- 11. Communicate clear expectations for school leadership chiefs and principal accountability for the administration and operation of special education at the school level. Ensure that accurate data are readily accessible to chiefs, principals, school personnel, and central office personnel.
 - a. Alignment of Plans. Align all improvement plans, e.g., Distinguished Educator's Action Plan, BPS Public School Choice, Corrective Action Plans, etc. Incorporate, reinforce, or cross-reference the planning tool the district uses to implement those Council team recommendations/activities that the district accepts.
 - b. Use of Data. Have the superintendent meet regularly with the leadership team to review data relevant to the implementation of these recommendations/activities. Include relevant principals in the review of school-based data. For example, include the following school-based data elements and have accountable staff members explain the disparities in graduation rates (at beginning of year), dropout rates (periodically when data are available), credits earned, failures and "D" grades, unexcused absences, suspensions (inschool and by race/ethnicity), office referrals, use of MTSS, referrals for special education evaluations and the percentage of students found eligible by disability area, and SPP performance indicators. Track the implementation of follow-up activities. The Baltimore City Public Schools have used this process with good results.

- c. Data Dashboard. Review the BPS data dashboard and expand it to include measures that would allow comparisons between schools and between subgroups of students, including students with IEPs, suspensions (by race/ethnicity), referrals for special education, placements of students in more restrictive settings, and dropout recovery/rates.
- 12. Identify a project manager—to report to the deputy superintendent or to the curriculum, assessment and instruction chief—to support the review and execution of recommendations. Have the project manager report on the collection of relevant data, track implementation of the recommendations and demonstrable outcomes, identify implementation barriers that require interdepartmental collaboration or the superintendent's involvement, and make any recommendations to the superintendent on adjustments or additional activities.

CHAPTER 5. SYNOPSIS AND DISCUSSION

The Buffalo Public Schools asked the Council of the Great City Schools to review the special education programs in the school district and to make recommendations on how to improve services to students with disabilities. To conduct its work, the Council assembled a team of special education experts with strong reputations for improving services in their own districts. The team made a site visit to Buffalo, conducted numerous interviews, reviewed documents, and analyzed data. To be sure, it is not easy to ask for one of these reviews because they are widely known as hard hitting and thorough. The Buffalo Public Schools have received a number of very tough reviews from the Council over the last 15 years that often made everyone uneasy. The Council devotes extensive time and energy to developing proposals for how urban school systems across the country can improve in the areas being reviewed, and that is what we have done with this report.

There are a number of areas, of course, where the school system and its stakeholders are doing a good job with students with disabilities. The central office has many talented special education administrators who are dedicated to providing the best possible services, and the schools have a large number of teachers and staff members who work to do a very difficult job well. In addition, the Buffalo Public Schools have a strong and knowledgeable Special Education Parent Advisory Committee (SEPAC), a dedicated District Parent Coordinating Council (DPCC), and an active Multilingual Education Advisory Council (MEAC). We would urge the district to collaborate more and to better coordinate their work with these important stakeholders; they are an important resource to the school system and are generally pushing educators in the right directions.

Moreover, according to one set of data, the relatively high identification rates of students with disabilities have been steadily decreasing since 2005. The school system is also using an outside consultant to help develop a districtwide MTSS plan, and is addressing the separation of the SST and CSE chairperson functions. The school system has a PBIS program, has recently revamped its code of conduct, and has a nurse in every school—all positive initiatives. In addition, the school system has a districtwide reading program and a pretty good data dashboard that has substantial potential. Finally, the Buffalo Public School district has met its state inclusiveness targets for educating students with disabilities in regular classes for at least 80 percent of the day (although criteria for placements in more restrictive settings was unevenly applied), and the district was found to be compliant on a recent Medicaid audit. So there are a number of features of the city's school system that provide a strong foundation on which to build.

But build it still needs to do because much of the service-delivery system for students with disabilities is not in good shape. In fact, it requires substantial reform and improvement. For instance, the school system has many talented and dedicated special education staff, but they are very disjointed and inefficiently deployed. In addition, while identification rates are decreasing overall, the recent surge in the numbers of pre-school pupils who were referred at the beginning of the current school year raises concerns. And while overall identification rates among African American children do not exceed state guidelines, they are identified at higher rates in the areas of emotional disturbance (ED) and intellectual disabilities (ID). The Council team was also concerned that English language learners appear to be identified at higher rates than their

proportion of the district's enrollment. The Council team was also concerned about the high rates of identification in the district's priority and focus schools.

Furthermore, the school system has an emerging data dashboard that has promise, but the district personnel do not have access to timely data on the status of students being evaluated for a disability or on the status of annual reviews—or reasons for delays. Simply put, data on special education in the district are hard to come by, fractured, inconsistent from one source to another, and piecemeal. The findings in this area have serious ramifications for both programming and reporting—and they presented substantial challenges for the Council team conducting this review.

In addition, the Council team was told that the district had an emerging MTSS plan—a good thing—but it had not yet been approved by senior staff, who did not want to share the drafts, so we could not determine whether or not the plan was good or whether there was funding in place to acquire the interventions that a good MTSS system requires. In general, the issue of quality is an important one in the school system because the overall performance level of students, especially students with a disability, is quite low, suggesting that programming and instruction are weak across the board.

Moreover, the Council team had concerns that some interventions were being put into place too late, i.e., after students were being considered for a special education evaluation, not before. It was also clear that the district did not have a good handle on all the interventions being used by schools or that evidence-based interventions were being implemented with fidelity. In general, teachers indicated that they struggled with differentiated instruction in general education classes.

The Council team also found co-teaching models that were not effectively or efficiently delivering in the ways expected, professional development that was inadequate to build staff capacity, compliance with some federal requirements that was questionable, and programming that was rarely evaluated for its effectiveness with students—along with many other concerns.

To address these and other issues, the Council team proposed a series of multi-layered recommendations to address organizational problems, staffing issues, data irregularities, professional development weaknesses, and programmatic-quality concerns. The school system has a number of challenges before it—and special education is only one. Still, the school system's efforts on behalf of students with disabilities could be substantially better than it currently is, given the high quality of many of its staff and teachers—and the direction in which they are trying to go. More than anything else, the district's special education efforts need substantially greater coherence and definition, for the system has unwittingly created a number of disincentives to more effective performance.

The Council of the Great City Schools stands ready to assist the school system, its leadership, and its staff as they work to improve the quality of instruction for the city's children. The Buffalo school system is not alone in its struggles to provide better services for students with disabilities.



COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Professional Development

2014-2015

Task Force Goal

To improve the quality of professional development for teachers and principals in urban public education.

To alleviate the shortage of certified teachers and principals in urban schools.

To improve the recruitment and skills of urban school principals.

Task Force Chairs

Deborah Shanley, Brooklyn College CUNY Dean Felton Williams, Long Beach School Board Craig Witherspoon, Birmingham Superintendent

Member

Airick West, Kansas City School Board

CGCS/HGSE EXECUTIVE EDUCATION PROGRAM

CONFIDENTIAL DRAFT FOR DISCUSSION

Program for New Superintendents, Chief Officers, and Rising School Leaders
Harvard Graduate School of Education & Council of the Great City Schools
July 10, 2014

Overview

The Council of the Great City Schools (CGCS) and the Harvard Graduate School of Education (HGSE) are exploring the idea of a new executive education program for early career superintendents, their chief academic, financial, and operating officers, and aspiring line and staff administrators. New superintendents, together with their chief officers and staff, are often under tremendous pressure to start their work with an aggressive agenda for reform and improvement, but often lack a clear mandate or path forward. They must quickly address critical issues – including capacity building and strategic planning – that drive student achievement, and they must do this in a highly-charged political landscape, responding to the expectations of their school boards and other stakeholders. Without a clear first-year plan, superintendents and their leadership teams can face rocky political terrain, preventing them from successfully focusing on student achievement and leading to faster turnover.

In addition, superintendents and their senior teams often find themselves hampered by an administrative bench that is too shallow or ill prepared to follow through on the action plan that leadership is charged with pursuing. This lack of staff capacity undermines the ability of many urban school systems to improve most rapidly or effectively.

CGCS and HGSE see the need for a program to support early-career superintendents entering new positions, together with their new chief officers, and the need to boost the capacity of senior staff members to whom much of the work is often delegated. In addition, we see an urgent need to build a stronger pipeline for aspiring CAOs, COOs, CFOs, Directors of Research, and other senior staff.

CGCS convenes and provides support to leaders of the largest urban public school districts in the United States. The organization's Urban School Executive Program (USEP) already provides rising line administrators with professional development and technical assistance based on lessons learned from the hundreds of Strategic Support Teams the organization has provided to its members. Still, no such program exists for rising executive staff and line positions in academically related areas that are focused on improving student achievement.

HGSE has trained superintendents who have gone on to lead some of the nation's largest school districts, and has supported sitting superintendents and their teams through existing executive education institutes offered through HGSE's Programs in Professional Education (PPE). PPE institutes are led by faculty (including former urban superintendents), built on educational research, and designed to transform both educational practice and leadership.

CGCS and HGSE's PPE propose to work together to design and provide capacity building opportunities to new superintendents, their chief officers, and aspiring staff and line administrators preparing them to respond to the multiple demands of their roles and supporting them to be successful leaders.

Participant Group

The program would focus on the needs of large, urban districts in the United States. Through three strands, the program would serve:

- 1. Brand new superintendents, superintendents new to a larger district, and superintendents who are entering a new position and seeking to retool,
- 2. Up to four members of the superintendent's leadership team, including their chief academic officers (CAOs), chief financial officers (CFOs), chief operating officers (COOs), and either their chief information officers or their chief talent officers, and
- A separate cadre of rising chief staff and line officers who need intensive professional
 development to support their work and who have the potential to become first-rate academic,
 financial, operating, or other administrative officers or who have the potential to eventually
 become superintendents. OK

In the first year it is offered, the program would seek to serve a cohort of at least 25 superintendents and chief officers, with a goal of eventually meeting the needs of up to 50 leaders per cohort (once the reputation of the program is established). The program would also provide intensive professional development to rising chief officers after the first year.

Proposed Program

The one-year program would launch with a three-day institute in July, just after superintendents are hired but before they start their new roles. Sessions would be held on the HGSE campus. The institute would initially bring together both strands of participants – superintendents and their leadership team – and would provide opportunities for participants to engage with their new teams, with HGSE faculty, expert practitioners, and with their new cohort of peers from across the United States. District teams might also include principal supervisors and other executive staff members. After the institute, HGSE and CGCS would continue to support the participating superintendents through resources and ongoing technical assistance and meetings (coordinated with existing CGCS gatherings). Upon the conclusion of the program, participants would receive a joint letter of acknowledgement from HGSE and CGCS recognizing their participation in the program, the form of which will be subject to the final review of both organizations.

The second component of the program would be devoted to building and strengthening pipelines of aspiring CAOs, COOs, CFOs, HR directors, Directors of Research, and others. This component would focus on staff members immediately below these chief positions and aspire to move up to senior positions

with the appropriate training and experience. This part of the program would also last one year. Individuals completing the program would receive a joint letter and would be supported by CGCS and the HDSE afterwards.

Learning Goals and Outcomes

Through the institute and ongoing engagements over the course of a year, the program's curriculum would address the specific needs of new superintendents and their leadership teams:

- Creating a clear strategy for moving their school districts and students to higher performance after a thorough analysis of current capacity and outcomes
- Developing a first year plan, sifting through conflicting priorities, and building political support
- Learning how to communicate effectively both inside the organization and externally to the public and the media
- Defining and articulating a theory of action for reforms
- Developing networks of support and resources to pursue a best-fit strategy
- Sorting through the research and the experience of others on what works and what doesn't
- Understanding and working under political constraints and realities
- Building and sustaining staff capacity
- Working with elected or appointed boards, and gaining a clear understanding of how leaders will be evaluated and held accountable--and for what
- Managing crises including crises of one's own making and crises brought on by others
- Knowing when things are going off track and learning how to restore equilibrium
- Managing performance and evaluating people
- Working with the media in good times and during crises

The initial three-day institute would be designed to address the systemic pressures on and needs of leadership teams, as well as the individual needs of superintendents and their senior teams. In addition to providing time for line administrators to plan with their new superintendents, the three-day institute would seek to develop leadership capacity through a focus on job-specific needs, including:

- Defining and managing instructional programs for better results, including how to handle political pushback (e.g., public understanding of the common core)
- Managing assessment systems
- Focusing on key performance indicators and data-based decision-making
- Managing financial crisis and bond issues
- Public persuasion –helping CAOs, COOs, and CFOs enhance their ability to work with the public and their boards
- Managing above and below one's position in the organization
- Taking care of one's self

The program would seek to build skills so that leadership teams can work in (and lead) cross-functional teams successfully, working across silos on broad problems—led by superintendents who are well prepared and supported.

Program Leadership

The program, through its development and delivery, would benefit from the leadership of Michael Casserly, Executive Director of the Council of the Great City Schools, and Deborah Jewell-Sherman, HGSE Professor of Practice and former superintendent of Richmond Public Schools. Casserly and CGCS have delivered critical support for new urban superintendents and their staffs, advising them and providing constructive feedback on their work. Jewell-Sherman has taught and advised aspiring superintendents and system-level leaders through HGSE's Urban Superintendents Program and Doctor of Education Leadership Program, and has served as faculty chair for PPE's National Institute for Urban School Leadership and Women in Education Leadership programs.

Alumni

HGSE and the Council anticipate creating a virtual network to support and connect the alumni of this program. We also envision the alumni of this program contributing substantively to teaching and leading future workshops. We could also imagine alumni hosting site visits for current participants.

Costs

Fees to each participant, including tuition, all instructional materials, and program events would be \$---- (Forthcoming per input from Betty Asamoah, PPE Financial Officer, and the Council). Our goal would be to work with school districts to include the fee for enrollment in the program in new superintendents' contracts. Other cost components would need further work.

A pilot phase grant (two to three years for the first few cohorts) would allow the program to sustain costs and develop curriculum while serving smaller initial cohorts. Once demand for the program is established, the goal would be for the program to be self-sustaining with cohort groups of approximately 50 individuals.

Harvard University-Council of the Great City Schools Leadership Institute New Superintendents

What You Will Learn

Productive, articulate, responsive leadership is expected as soon as a new superintendent, chief executive officer, or chancellor assumes office. Multiple institutional pressures do not always permit the luxury of learning on the job. The Harvard University-Council of the Great City Schools Institute provides a practical and conceptual orientation to the superintendency, particularly in large urban school systems. It familiarizes new superintendents with the opportunities and hazards they will likely face and prepares them to respond to the many responsibilities and constituencies of their new roles.

Program Overview

In sessions ranging from leadership to financial management, the Institute focuses on the critical issues of the first months and years of the superintendency. It provides a chance for new school superintendents to reflect on their own situations and to consult with experts about their special concerns and circumstances. Most importantly, the five-day Institute introduces superintendents to an extraordinary peer group of colleagues from across the country.

Program Objectives

Intensive, interactive sessions address key topics critical to the first year of the school superintendency, including:

- Leadership explores the importance of core values and beliefs; moral conviction and its application to achievement gaps; theories of action and how one knows what will be most effective; managing the change process; the uses and limits of power and authority; when to go it alone and when collaboration is imperative; accountability and how to define and apply it; how to best communicate with the public and internal stakeholders; crisis management (including crises of one's own making) and strategic communications; the politics of the superintendency; establishing norms and expectations; how to tell when things are going off track and how to reestablish equilibrium; and innovation, its promises and limitations.
- The Context of Leadership takes on issues of organizational culture and traditions; the legacy of prior leaders and what to keep and what to change; the demographics of faculty, staff, and students and how they affect your theory of action; school board expectations and why you were hired; key stakeholders inside and outside the organization and how to build coalitions; organizational and community needs and what happens when they are out of sync; managing parent and community meetings; and how to pick your fights and which ones to avoid.
- Governance addresses differing models of school district governance and their implications; working with elected versus appointed school boards; collaborating effectively with the board on its priorities and your joint theory of action; how to manage and communicate with your board ("managing up"); keeping the board focused on the district's main goal: improving student achievement; how to deal with turnover among board members and outliers on the board; working with the board on meeting agendas; how to keep the board from consuming your time; helping the board provide constituent services; and managing the school board's relationship with administrative staff.

- Strategic Planning investigates the merits and liabilities of strategic planning; what good strategic plans looks like, what they include; what they aim to accomplish, who to involve, and how they are used; how to look at previous strategic plans; developing a first-year plan of action; balanced scorecards and other indicator systems to assess how your new district is doing; and evaluating the effectiveness of plans.
- Building Your Administrative Team introduces new superintendents to such topics as recruiting, onboarding, and supporting strong individuals and teams; how to decide who to keep and who to move; dealing with the school board politics of staff selections and deployment; talent versus loyalty; dealing with staff who seem immune to change; holding staff accountable; effective organizational structures and designs; using cross-functional staff teams on major priorities; hiring, retaining, and firing issues; how to delegate responsibility and distribute and enhance staff leadership; deciding who and how many people to bring with you to the new district; defining your cabinet; and avoiding your own ego in staff selections.
- Unions and the Media deals with relations with organized labor and the press. It covers the differing imperatives of the superintendent and union leadership and the press; the relationships and interactions of the school board, the unions, and the media; ongoing communications with the unions and the press; managing change with a reluctant union; handling grievances; collective bargaining and contract negotiations; planning and strategy for negotiating multiple contracts with differing unions; compliance with the contracts and how to manage that compliance; negotiating strategy; sustaining contract gains; and securing concessions and their costs.
- Academics and Instructional Leadership presents lessons on moving a school district forward
 academically and improving student achievement; defining your academic theory of action;
 building capacity among district and building level staff and teachers to improve outcomes for
 students; high leverage instructional strategies and what the research says about what works and
 what doesn't; measuring your instructional progress and the use of data; working with your chief
 academic officer; and why some school systems show academic gains and some don't.
- Financial and Operational Management focuses on the role of the superintendent in ensuring effective management and stewardship of the district's financial resources and operations. It covers how to look at and manage financial data along with cost and revenue indicators; strategies for improving efficiencies and effectiveness; transparency with the public, parents, taxpayers, and elected officials; short-term and long-term budgeting; going to the voters for a bond issue or levy increase; how to manage bond proceeds and the bonding agencies; risk management; tradeoffs with scarce resources; and working with your chief financial officer. It also explores how to effectively manage your operating systems, including your transportation, food services, information technology, and security operations.
- Managing Your Life as a Superintendent and Issues of Ethics is devoted to work-life balance; keeping your sense of perspective and sanity; handling family time and expectations; being a public figure; crafting and managing your own contract; defining how and when you will be evaluated, by whom and on what; salary negotiations and the limits of propriety; relationships with peers and direct reports; personal assets and flaws and knowing oneself—the inner work of decision-making; the ethics of outside consulting, conflicts of interest, confidentiality, and

relations with vendors; organizations, networks, and people to rely on for advice, support, and camaraderie; and knowing when to exit.

Who Should Attend

- First-time superintendents
- Superintendents who have just been appointed to a new district or are in their first year on the job
- Enrollment is limited to approximately 50 new superintendents

Dates and Duration

- The program is expected to launch around June 21, 2015
- The new superintendent program would last five days

Harvard University-Council of the Great City Schools Leadership Institute Aspiring Chief Academic Officers

What You Will Learn

Effective, informed, and responsive leadership is expected as soon as a new chief academic officer assumes office. Unfortunately, there are few opportunities for aspiring chief academic officers and curriculum and instructional leaders to prepare for the job and learn what it entails to succeed. The Harvard University-Council of the Great City Schools Institute provides a practical and conceptual orientation to the chief academic officer position, particularly in large urban school systems. It is designed to prepare aspiring instructional leaders to move into these positions effectively and helps school districts build a pipeline of future leaders.

Program Overview

In sessions ranging from leadership to instructional budget preparation, the Institute focuses on the critical issues of the first months and years of the chief academic officer position. And it provides a chance for new chief academic officers to reflect on their own situations and to consult with experts about their special concerns and circumstances. Most importantly, the four-day Institute introduces aspiring chief academic officers to an extraordinary peer group of colleagues from across the country.

Program Objectives

Intensive, interactive sessions address key topics critical to the development of aspiring chief academic officers and leaders, including:

- Leadership focuses on what chief academic officers do and how it differs from other instructional staff positions; how to define an instructional vision and theory of action; how to conceive of an instructional theory of action and how to determine whether it matches the needs and capacities of district staff, teachers, and students; how to judge what to do with legacy programs; how to manage change; the role of chief academic officers in working with stakeholders, parents, and community organizations and building support for reform and improvement; how chief academic officers work in tandem with their superintendents to improve academic achievement; what systems thinking looks like at the CAO level; managing instructional crises; and how to navigate the political challenges of the job.
- Organization and Staffing addresses of effective organizational structures within the offices of
 chief academic officers; the pros and cons of managing principal supervisors and school chiefs;
 hiring, retaining, and firing staff along with how and when to do each; managing subject-matter
 staff and content experts; how to assess the strengths and weaknesses of current staff; building
 staff capacity to do the work; evaluating staff and principals; staff deployment and teaming; how
 to delegate responsibilities; defining and implementing districtwide academic accountability;
 creating learning communities; and strategies for effectively interacting and working with other
 departments.
- Managing the Instructional Program deals with preparing and assessing the effectiveness of district curriculum and whether you need one; implementing college and career-ready standards; assessing the effectiveness and suitability of commercial products and how to tell whether or not they align with standards and curriculum; ensuring the seamlessness of programs; judging the

effectiveness of legacy programs; achievement gaps and high-leverage strategies for reducing it; using supplemental and intervention programs effectively and appropriately; universal design principles; opportunities for early "wins" in improving academic achievement; defining and evaluating effective professional development and what it looks like; monitoring classroom instruction and principal support of it; research on what works in improving student outcomes and what doesn't; understanding why the instructional program has the effects it has; interacting with and collaborating with information technology leaders and staff; and textbook adoption and procurement.

- Preparing and Managing Budgets handles the all-important task of financial management
 responsibilities of the chief academic officers. It includes issues related to working with the chief
 financial officer; budgeting; selling your budget to the superintendent and school board;
 managing your budget over the course of the school year; federal and state financial and program
 compliance; and return-on-investment strategies.
- *Use of Data* is devoted to how to use data to inform instructional practice, shape decision-making around professional development, supplemental needs, and academic interventions; how to coordinate the instructional work with research and assessment staff; using program evaluation to improve academic effectiveness; managing assessment systems; and knowing when the instructional program has stalled or going off track.
- Managing Your Life as Chief Academic Officer and Issues of Ethics undertakes how to manage your personal life during periods of high professional stress; knowing your strengths and weaknesses and how not to let the former get in your way and how to compensate for the latter.

Who Should Attend

- Senior curriculum and instruction staff, content directors, principal supervisors, and others who aspire to become chief academic officers of their districts.
- New chief academic officers who have just been appointed to a new district or are in their first year on the job
- Enrollment is limited to approximately 50 individuals

Dates and Duration

- The program is expected to launch around August 5, 2015
- The new superintendent program would last four days

URBAN SCHOOL EXECUTIVE PROGRAM



Urban School Executive Program (*C'USE*) 1301 Pennsylvania Avenue, N.W., Suite 702 Washington, DC 20004

The Council of the Great City Schools' *Urban School Executives (C'USE) Program* is designed for mid-level managers who meet the highest professional standards and have the attributes, if given the opportunity, to assume senior executive positions as Chief Information Officers and take on the challenges that large urban school districts face.

The *C'USE Program* is based on the lessons learned from reviews that the Council has conducted in large urban school districts that illustrate the systemic political, strategic, organizational, leadership, management and operational issues and challenges that Chief Information Officers face.

C'USE requirements include the following--

- Candidates attend the Council's annual meeting of Chief Information Officers to hear current challenges, and participate in discussions and work session on current issues.
- Candidates participate in monthly group discussions that relate to current issues and challenges.
- Candidates develop a high-level written 90-day, one year and longer-term strategic business plans that address the systemic issues and challenges they would face as Chief Information Officers and present 15 minute overviews of their plans at the Council's annual meeting of the Chief Information Officers in the following year.

C'USE Certificates of Achievement will be presented to those judged by subject-matter experts as qualified to assume senior executive positions as Chief Information Technology Officers and references will be provided when those positions become available.

For More Information Contact:



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Urban School Executive Program 1301 Pennsylvania Avenue, N.W., Suite 702 Washington, DC 20004 (6.6.14)

Seminars leaders are required to prepare and forward a list of readings and set of questions to lead discussions on their chosen topics to classmates two (2) weeks prior to the scheduled dates. The readings and discussion questions will also be posted on the Council's EduPortal®eLibrary and EdWires.

The seminar leaders should recognize that all of the topic areas are in some way related to each other and the topics should be discussed not as discrete subjects but as components of the old Deming "Plan-Do-Check Act" cycle which has resurfaced over the years. The intended purpose is to transition or transform IT from just an operational "keep the lights on" role to a business acumen, visionary and consultant to the leadership role.

2014 *C'USE* Seminar Topics

- **Change management strategies** that use both formal in informal communication channels to coordinate plans, goals, priorities and report results and metrics to stakeholders.
- **Department business plans** with detailed actions that are aligned to support district goals, priorities and initiatives. (Johnson #1)
- **Strategic plans** that provide the resources necessary to support the equipment, systems, and instructional environments at a level that will assure reliability, capacity, and effectiveness. (Rae #1) (Johnson #3) (Hogan #1)
- Enterprise systems architectures that align data flow and work processes and eliminate fragmented systems, expensive system duplication and inconsistent data. (Laneau #2)
- Organizational structures that position Chief Information Officers that are positioned to strategically
 advise, coordinate, control, and standardize diverse technology initiatives. (Rae #2) (Philip #3) (Johnson
 #2) (Hogan #2)
- **Governance processes** that set strategic priorities, allocates resources and manages the district's project portfolio. (Laneau #3)
- Framework of **standards** that eliminates overlapping and competing instructional systems, aligns technical support at schools, and improves efficiency and that supports students and schools.
- Risk mitigation strategies versus crisis management.
- Integrated operations, cross-functional teams, collaborative problem solving and monitoring of progress.
- Comprehensive and ongoing training plans to skill-up staff and allow for cross-training of key functions.

- **Portfolio management** to select and control major projects so that authorized projects represent a balanced and optimized approach that meets the district's strategic objectives. (Philip #2)
- Business case methodologies to ensure projects are selected based on objective analyses of their value (cost/benefit analysis), risk (comprehensive project risk assessments), cost (including the total cost of ownership and return-on-investment), and timeliness. (Philip #1)
- **Performance measures, benchmarks, or peer comparisons** to establish best practices, maximize operational efficiency, or identify potential cost savings or systems improvements.
- Business continuity and technology *disaster recovery plans* to protect a district's information assets.
- *Instructional future needs and requirements* to lead and instructional systems architecture of aligned systems.
- Federal, State and local laws (FERPA, HIPPA, COPA, CIPA ...) for *safe and secure teaching, learning, and work environments.* (Laneau #1)
- **Business system user needs and future opportunities** (Student, assessment, Learning management, web resources, student support, content).
- 3 5 year **technology master plans** that support the business, educational and infrastructure needs of the system. (Rae #3) (Hogan #3)

ENGLISH LANGUAGE LEARNERS AND BILINGUAL EDUCATION TASK FORCE

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on English Language Learners and Bilingual Education

2014-2015

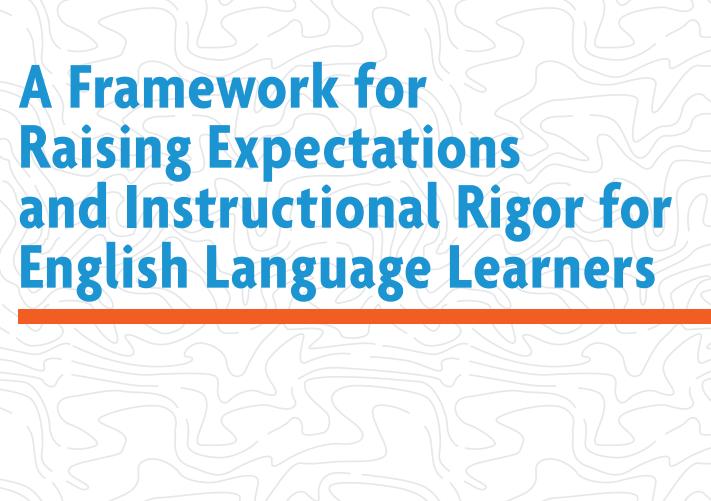
Task Force Goal

To assist urban public school systems nationally in improving the quality of instruction for English Language Learners and immigrant children.

Task Force Chairs

Keith Oliveira, Providence School Board Valeria Silva, St. Paul Superintendent

FRAMEWORK FOR RAISING EXPECTATIONS AND INSTRUCTIONAL RIGOR





About the Council

The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 67 large city school districts, its mission is to promote the cause of urban schools and to advocate for inner-city students through legislation, research, instructional support, leadership, management, technical assistance, and media relations. The organization also provides a network for school districts sharing common problems to exchange information and to collectively address new challenges as they emerge in order to deliver the best education for urban youth.

Chair of the Board

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Immediate Past Chair

Valeria Silva, Superintendent St. Paul Public Schools

Executive Director

Michael Casserly Council of the Great City Schools

A Framework for Raising Expectations and Instructional Rigor for English Language Learners

August 2014



Acknowledgements

English Language Learners are one of America's fastest growing student groups, and their numbers are most concentrated in our Great Cities. In addition, the academic needs of these school children are complex and varied.

Fortunately, the achievement of these students is being taken seriously by urban educators across the nation. They have coalesced around a series of activities to ensure these children learn English and thrive in their studies of all subjects.

This document is one more piece of evidence of how urban school leaders are working to ensure success for all our students. It addresses two critical challenges. One, it outlines a framework for acquiring English and attaining content mastery across the grades in an era when new college and career-ready standards require more reading in all subject areas. And two, it presents criteria by which school administrators and teachers can determine whether instructional materials being considered for implementation are appropriate for English Language Learners and are consistent with the Common Core State Standards. Nothing like this has been tried before.

The intellectual horsepower that was involved in pulling this document together was impressive. Behind every concept and sentence was a team of extraordinarily talented and committed individuals who I thank from the bottom of my heart. They include: Teresa Walter, Maryann Cucchiara, Rebecca Blum-Martinez, Lily Wong-Fillmore, and our own Gabriela Uro and Debra Hopkins. Also contributing their expertise were Farah Assiraj, Nicole Knight, Angie Estonina, and Lynne Rosen. The countless hours this team of amazing people devoted to this task was exceptional. We also thank the school systems, universities, and organizations that permitted these individuals to work collaboratively on such an important initiative.

Finally, we thank The Bill & Melinda Gates Foundation for their support of this initiative. The work could not have been accomplished without our former program officer Melissa Chabran and our current program officer Sandra Licon. Their guidance was critical to the success of the work. Thank you.

At this point, we hope that school officials and teachers across the country will use this document and the proposals and criteria in it to strengthen instruction for our English Language Learners and ensure they have materials that meet their needs.

Executive Director Council of the Great City Schools

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Preface

The Council of the Great City Schools is a membership organization of 67 of the nation's largest urban public school districts. These districts collectively enroll over 1.2 million English Language Learners (ELLs) or about 26 percent of the nation's total. The Council has a strong track record of initiating and working on policy, research, and programmatic efforts at the national and local levels to improve academic achievement among ELLs. Among other initiatives, the organization has produced groundbreaking reports and studies on how urban school systems improve the academic attainment of ELLs and comprehensive surveys on the status of ELLs in the nation's urban schools. In addition, the Council works directly with its member school districts to improve and support their instructional programs for ELLs through technical assistance, professional development, on-site reviews, meetings, and a national network of practitioners.

In conducting its work, the Council has found that many urban school districts report significant difficulty finding high quality, rigorous, grade-level instructional materials that are written for ELLs at varying levels of English proficiency. This dearth of materials presents a substantial problem for urban districts that enroll sizable numbers of ELLs, and it is particularly acute at the secondary grade levels, where the complexity of content and text is higher than at the elementary grades. The adoption and implementation of the new Common Core State Standards (CCCS), as well as new state-level English Language Development (ELD) standards, have only made this instructional need more obvious. This need was further documented by the Council's own field survey to gauge the perceived quality of instructional materials for ELLs. The results of this survey corroborated what has been common knowledge among urban educators for some time, i.e., quality instructional materials for ELLs are in short supply and the need has been exacerbated by the adoption of the CCSS.

The adoption of these new standards underscores the importance of having rigorous and explicit guidance, both for defining a new instructional framework for ELD and for selecting instructional materials that are complex, standards-aligned and able to meet the specific needs of ELLs within a district's chosen program model. ¹

Therefore, the overarching purpose of this document is to define a new vision for English Language Development, to share examples of instructional delivery models, and to provide step-by-step guidance for selecting instructional materials that will accelerate the acquisition of academic language and grade-level content for all English learners in urban school districts. This document may be used alone, or in combination with other evaluation protocols adopted by districts, as deemed appropriate by each district's instructional leadership.

¹It is important to consider qualitative measures of text complexity as reflected in the Text Complexity section in the ACT Reading Between the Lines report, 2006 (p.14) http://www.act.org/research/policymakers/pdf/reading_report.pdf and in the numerous resources provided by Achieve the Core achievethecore.org > ELA/Literacy > Curricular Tools > Text Complexity Collection.

Before selecting instructional materials for ELLs, however, districts must have a clear vision of how their instructional program for ELLs ensures attention to the instructional shifts and rigor of the Common Core², providing both the language development and the scaffolded grade-level content required for ELLs to be successful. To aid districts in this task, we have developed a framework for English Language Development (ELD) that is anchored in the language demands of the Common Core; we call this the *ELD 2.0* Framework. The next section describes the underlying pedagogy related to language acquisition, language development, and rigor, and also defines the specific components of the *ELD 2.0* Framework. While the two major components of the framework are defined explicitly, the delivery of the model is described more generally, in order to allow districts to fit the *ELD 2.0* Framework within their own program design.

Re-Envisioning English Language Development (ELD)

The Common Core State Standards (CCSS) apply to general education, as well as to any instructional programs specifically designed for and/or targeted to ELLs. So districts and states are not only grappling with how to facilitate implementation of CCSS for all students, but they must also address the specific needs of students for whom English may be newly developing. As they respond to the required shifts within both the general education curriculum and ELL programs, districts need to accomplish two important goals:

- Access to Common Core. Districts must ensure that ELLs across all levels of language proficiency can access and fully engage with the more rigorous grade-level English Language Arts (ELA) and mathematics standards called for in the Common Core and College and Career Ready standards.
- **English Language Development.** Districts must ensure that ELLs are developing their English and closing the academic language gap. The ELD/ESL curriculum and instruction for ELLs must be must be designed and delivered in a manner so that *all students* can meet the language demands of the Common Core.

A number of efforts are underway to further elaborate what the instructional shifts in English Language Arts and mathematics mean for all students, and particularly for ELLs. Parallel efforts are also underway as new state-level ESL/ELD standards are aligned to the Common Core. There are few efforts, however, that explicitly and *in a practical way* connect the changes that need to occur in the design and delivery of ESL/ELD and the language development instruction that must also occur across the content areas for students to fully realize the expectations of the disciplines. For ELLs, this means that both targeted services/instructional programs for ELLs *and* general education must share the responsibility for developing discipline-specific content knowledge and academic language proficiency.

²For more information regarding these instructional shifts, see http://www.corestandards.org/other-resources/key-shifts-in-english-language-arts/

Key challenges and factors that must be considered in building a common understanding and guiding principles for ESL/ELD programs include the following:

- English language learners are a diverse group of students with varying backgrounds, experiences, cultural contexts, academic proficiencies, and levels of English proficiency. Some may be just beginning to add English to their language proficiencies; others may be nearing English proficiency. Schools must, therefore, take these factors into consideration as they plan and provide instruction that will enable all ELLs to develop and extend English proficiency as they also achieve the academic standards established for their grade levels.
- English Language Development may be defined differently across school districts, or may use differing names: English Language Development (ELD), English as a Second Language (ESL), English Language Acquisition (ELA), etc. Despite this diversity of terminology and definitions, districts would benefit from developing a consensus around key components of ELD vis-à-vis the new standards (Common Core or College and Career Ready).
- Instructional Delivery varies with regard to how and by whom English language development and/or core instruction is provided. These differences in delivery design across the districts are determined by a number of factors, including state law, resource allocation, and/or particulars specified in district compliance agreements with the Office for Civil Rights (OCR) or the Department of Justice (DOJ).³
- Strategic Use of Native Language varies among the districts' instructional programs for ELLs, and may be used to support English acquisition and access to grade-level content. If programs include the development of native language literacy as a goal, they must include rigorous academic language development in the native language, providing access to increasingly complex language.

Theory of Action for ELLs and the Common Core

We conceive of a complete language learning experience for ELLs that is grounded in a theory of action that affirms that English Language Learners are capable of engaging in complex thinking, reading and comprehension of complex texts, and writing about complex material. If teachers are given time to analyze the CCSS and plan effective lessons based on the standards and using grade-level appropriate, complex texts, ELLs will acquire the reasoning, language skills, and academic registers they need to be successful across the curriculum and throughout the school day. Teachers, in turn, need support and guidance from instructional leaders who understand the important shifts needed to engage ELLs in complex thinking, talk, and tasks anchored in complex, grade-level texts.

Anchored in the language demands of the new standards and following the above theory of action, a redesigned ELD framework — called *ELD 2.0* — has been jointly developed by member district practitioners and ELL experts to assist districts in ensuring that ELD is purposeful and fully integrated into newly adopted content standards. This redesigned framework includes two key components: a *focused language*

³The Office for Civil Rights acknowledges that "Educators have not reached consensus about the most effective way to meet the education needs of LEP (Limited English Proficiency) students" and thus, OCR allows school districts broad discretion concerning how to ensure equal education opportunity for LEP students: "OCR does not prescribe a specific intervention strategy or type of program that a school district must adopt to serve LEP students …" http://www2.ed.gov/about/offices/list/ocr/eeolep/index.html.



study (FLS) time, where ELLs are grouped together to concentrate on specific elements of the English language that their native English-speaking peers already know, and the discipline-specific and academic language expansion (DALE) that is on-going and integrated into the different content areas, which ELLs, along with their native English-speaking peers, must study throughout the school day.

Assisting ELLs with the particular structures of English, as would take place in the *focused language study*, is meant to support their language growth. However, the majority of their *discipline-specific academic language expansion* will occur within their grade-level, content-specific classes. This is where they spend the majority of their time and where language is used for real purposes, namely in the acquisition of concepts and skills within authentic material. It is helpful to remember that ..."language is learned, not because we want to talk or read or write about language, but because we want to talk and read and write about the world...especially for children, language is the medium of our interpersonal relationships, the medium of our mental life, the medium of learning about the world" (Cazden, 1977:42).

ELD 2.0 Framework

In contrast to earlier models of English language development, which were often approached in a decontextualized and/or over-simplified mode, *ELD 2.0* clearly articulates and attends to the development of full and robust English proficiency across all language domains and all subject areas. It lives within — not apart from — overall efforts to raise the rigor of language and content instruction, ensuring that all students achieve the expectations of the Common Core. *ELD 2.0*, therefore, must be embedded in and delivered through effective instructional practices that are guided by the instructional shifts and content standards of the Common Core. Instruction must fully engage ELLs, accelerating language acquisition and learning across the day. The re-designed framework has two critical elements:

- Focused Language Study (FLS): This element calls for dedicated time for focused instruction in how English works, providing ELLs with an understanding of the basic structures of language in all four domains for a variety of registers, especially the academic register needed to engage in academic discourse across all content areas. FLS would likely be part of what districts call ESL/ELD and may be provided to ELLs in a variety of configurations, for example, as part of the ELA class or as a stand-alone ESL class.
- Discipline-specific and Academic Language Expansion (DALE): This element calls for the development and expansion of discipline-specific and academic English across the day by all teachers and integrated into all subjects. The language learning that occurs during a student's experience with the different content areas (i.e., social studies/ history, science, math, English language arts) is especially valuable for ELLs because it extends and stretches their language development in new and various directions. It also deepens a student's understanding of how language can be used for diverse purposes and in different ways. This is the only way that ELLs learn to use language in the different academic registers.

The subject area content is embedded in distinct uses of language that convey certain ways of thinking about the important concepts and ideas in that particular field (Shanahan & Shanahan, 2008; Fang & Schleppegrell, 2010). Within these content areas language is used in distinct ways, not only because each content area deals with different subjects, but also because each subject describes and engages in different processes, concepts and argumentation. (Shanahan & Shanahan, 2008; Fang & Schleppegrell, 2010)

So, subject area teachers must learn how to assist ELLs in the academic registers and ways of thinking and expressing ideas in their fields. Subject area teachers must also help ELLs with the concepts specific to their field and assist ELLs in paying close attention to *language usage* in each field; for example, how the use of the present tense can often signify a timeless present, not just what is happening right now, as in "Trickles of water flow together to form a brook." (Dorros, A. 1991), or how the use of modals can signal possibility or uncertainty on the part of the author—"The two processes could well be independent." (Biber, et al., 2002: 178). This kind of close reading can begin in the content area class and then can be reinforced in the focused language study period.

The table on the following page displays the key elements of *ELD 2.0*, which are interrelated and together form a framework upon which effective ELD can be built.

Theory of Action/ELD 2.0 References

Biber, D., et al. (2002). Longman Student Grammar of Spoken and Written English. London: Longman.

Cazden, C. (1977). "Language, Literacy and Literature." In The National Elementary Principal, 57(1): 40-52.

Dorros, A. (1991). Abuela. New York, NY: Penguin Group.

Fang, Z., & Schleppegrell, M. J. (2010). Disciplinary literacies across content areas: Supporting secondary reading through functional language analysis. In Journal of Adolescent and Adult Literacy, 53(7): 587-597.

Shanahan, T. & Shanahan, C. (2008). Teaching disciplinary literacy to adolescents: Rethinking content-area literacy. In *Harvard Educational Review*, 78(1): 40-59.

Key Elements of the ELD 2.0 Framework

Key Elements of the ELD 2.0 Framework							
	WHAT	HOW					
Focused Language Study (FLS)	a. Focused English Language Development: A dedicated time for very targeted ELD. Instruction focuses on HOW English works — those elements that are already typically known to native English speakers but must be systematically developed by ELLs. (Fillmore & Fillmore, 2012.) b. Focus on functional/purposeful use of language — appropriate to varying language proficiency levels c. In some districts, ESL/ELD serves as the English Language Arts (ELA) course for ELLs. These ESL/ELD courses are aligned to both the Common Core or general ELA curriculum and the ESL standards. d. Instruction is directly linked and applicable to functional aspects of schooling, as well as language needs across the content areas	 a. Students may be grouped by English proficiency levels (important for students at beginning levels and best when students are mixed within a limited range of levels, not isolated in a single-level group). b. A specified number of minutes (e.g., 30-60) is allotted in elementary grades, or a class period(s) is allotted at the secondary level, either as a stand-alone class or in combination with ELA, depending upon students' English proficiency levels and other instructional needs. c. Instruction may be provided by: ESL teacher (push-in, pull-out) Classroom teacher (as a small group) Co-teachers (each with a small group at similar language levels) 					
Discipline-specific and Academic Language Expansion (DALE)	 a. Language development takes place in an integrated manner within the appropriate grade level b. Instruction for language expansion is embedded in and informed by content across the subject areas c. Content area instruction includes attention to the lesson's language demands, challenges, and opportunities d. High-utility, cross-discipline academic language development is an instructional focus e. Discipline-specific language development supports and benefits all students, beyond ELLs 	 a. Instruction is in the context of grade-level content and focuses on deliberate language development through Complex Thought, Texts, Talk, and Tasks (Cucchiara, Fillmore & Fillmore, 2012) b. DALE is never decontextualized; rather, it is integrated to facilitate development of discipline-specific language and concepts within grade-level content-area classes c. Instruction may be provided by Content-area teacher Co-teachers: Content-area teacher and ESL teacher planning and teaching together 					

Effective Instructional Practice. Effective instructional practice involves curriculum design, well-defined and organized programs, cross-functional collaboration, and effective teaching and is guided greatly by the demands and shifts of the Common Core and the new standards in various disciplines. The descriptors of 'how' *ELD 2.0* is delivered aim to capture the great variability that exists in how Council member districts provide language instructional support and ensure access to the core curriculum for ELLs. Effective instructional practices for ELLs depend on a number of important factors, including:

- a) High quality, rigorous instructional materials that align with your program/delivery model, engage ELLs, and accelerate grade-level content and language development aligned to the Common Core (See the *Appendix* for guidance in matching instructional materials to your program model.)
- b) Attention to the instructional shifts indicated by the Common Core
- c) Provision of scaffolding and other supports as appropriate for ELLs; for example, districts may be implementing SIOP, QTEL, or GLAD as a way to provide comprehensible input; however, these strategies would still need to exist within the context of the district's *overall instructional design* for development of academic language and grade-level content for ELLs
- d) Supportive school structures, i.e., instructional coaches, professional learning communities, extended learning (before/after school, tutorials), leadership development
- e) Evidence-based and programmatically coherent supplemental support for students
- f) Quality professional development that is timely, effective, sustained, and designed to build district- and school-level capacity

The effective implementation of the *ELD 2.0* framework, alongside effective Common Core-driven instructional practices for ELLs, will be contingent upon how districts and schools create systemic supports that take into account all of the factors listed above, integrating *ELD 2.0* into their own delivery models.

Program Models & Delivery Options

It is critically important that districts clearly articulate program models and delivery options for both English Language Arts (ELA) and English Language Development (ELD) before determining what instructional materials are needed, for whom, and why. (See also the Appendix) It is only after establishing and articulating the context in which the materials will be used that a district can effectively evaluate instructional materials, determining those that best suit their specific context.

District English Language Arts (ELA) Context: In selecting Core ELA materials, a district will examine its current context to determine what is needed: Is the district creating CCSS aligned units of study, curriculum maps, or frameworks? What is the overarching approach to literacy at various grade levels? Are there systems in place for strong and sustained professional development? Does the district take the stance that instructional materials are used *in support of* quality teaching — or are they intended to *guide* quality teaching? The answers to these questions may help determine whether a district will select a core ELA program that offers a more structured, comprehensive approach or a more flexible ELA program comprised of carefully chosen text sets and resources.

District ESL/ELD Context: In selecting ESL/ELD materials, a district will determine the key elements and objectives of its English language instructional program to ensure that ELLs acquire academic English and achieve grade-level academic standards. How do the ELD/ESL program objectives align to ELA and content standards? When and in what class(es) is the ELD/ESL instruction imparted? Which instructional staff members are responsible for providing ELD/ESL instruction or support? How is native language used to support literacy, content knowledge, and English acquisition?

Districts may organize and structure ELA/ELD instruction in any number of ways, depending on staffing and scheduling resources, and considering first language, proficiency in English, or prior schooling experience. Instruction may be grade-level specific, or may be grouped across grade levels according to language proficiency level. The district approach may also vary by grade level (elementary, middle, and high school may use the same or different approaches) or by typology of ELLs, e.g., students with limited formal education. For example:

Combined ESL/ELD Class (ELD instruction is embedded within/a part of ELA):

Most often designed for ELLs at earlier levels of English proficiency, this class combines both ELA and ELD. The ELD class serves as (replaces) ELA for ELLs. These classes are aligned to grade-level-specific Common Core standards, guided by ELD standards, and may occur at elementary or secondary levels.

- **Elementary**: Scheduled time in which ELLs receive ELD instruction that incorporates ELA standards (and perhaps other content instruction)
- Secondary: Dedicated ESL/ELD courses in middle and high school

Separate ESL/ELD Classes (ELD instruction occurs separate from/in addition to ELA):

Students receive grade-level, Common Core-aligned ELA instruction, which may be specifically designed for ELLs or in a heterogeneous class with non-ELL students. In addition, students also receive dedicated ESL/ELD instruction as a complement to (not replacement for) ELA. In this model, students are often grouped by language proficiency for *Focused Language Study* (FLS). Focused ESL/ELD may occur at elementary or secondary levels.

- **Elementary:** Focused ESL/ELD provides for dedicated instruction in FLS through pull-out, push-in, co-teaching, or by the classroom teacher in small group instruction. In addition, students receive standards-aligned grade-level ELA instruction.
- **Secondary:** Middle or high school students have two scheduled classes: one is focused on ESL/ELD, and the other provides standards-aligned, grade-level ELA instruction.

Implementing ELD 2.0 Within Your Delivery Model: Two District Examples

Following are brief examples of how two large urban districts are implementing the *ELD 2.0 Framework* within their program model.

District A has utilized the *ELD 2.0 Framework* to examine how to better address the inherent language demands and discourse patterns of the Common Core State Standards and Next Generation Science Standards. The Council's framework delineating Focused Language Study (FLS) and Discipline-specific Academic Language Expansion (DALE) has been formative in the district's reconceptualization of ELD.

Recognizing that language and content are essential components in both ELD instruction and content instruction, and aligning with its state ELA/ELD Framework, **District A** has determined that students at every grade level across the language proficiency continuum will receive both:

Designated ELD (FLS): A protected time where ELD teachers can zoom in on focused language study connected to core content. During Designated ELD, language is in the foreground, and the focus is on how English works. Instruction is targeted to the three proficiency levels of the state ELD standards (emerging, expanding, bridging).

Integrated ELD (DALE): English Language Development that is embedded in core content instruction across the day and delivered by general education teachers with ELD training. During Integrated ELD, content is in the foreground, and the focus is on interacting in meaningful ways in service to accessing gradelevel content.

District B has developed its ELL programs according to the parameters agreed to in the Compliance Agreement entered into with the Department of Justice and the Office of Civil Rights. They are currently reenvisioning their ESL curriculum to better prepare ELLs for college and career pathways, and the key elements of ELD 2.0 establish the conceptual framework for English language development and content instruction. Thus, all ELLs in **District B**, regardless of language proficiency, will receive instruction that centers on complex text and "juicy sentences" delivered by teachers as follows:

Focused Language Study (FLS) will be delivered by English as a Second Language (ESL) teachers and will provide explicit, direct, and systematic instruction in how English works within complex text. The focus will be on building academic English, specifically addressing gaps in language and literacy through grade-level instruction.

Discipline-specific and Academic Language Expansion (DALE) will be provided by state-qualified content area teachers who have received appropriate training on sheltering practices. Delivered via Sheltered English Immersion (SEI), this instruction will also use complex text addressing grade-level content, ensuring that important science, social studies, mathematics, and other content is comprehensible and that ELLs acquire the academic language and registers of each of the content areas.

Evaluating Instructional Materials: A User's Guide

Once you have defined and articulated your delivery model and the type of instructional materials needed to design and deliver effective instruction, you are ready for the next step of the process. As you review the following sections in preparation for the evaluation and selection of instructional materials for ELLs, consider each step of the process to be a gateway. Though you may begin with a daunting number of submissions to consider, you can gradually and efficiently winnow the submissions until you arrive at the instructional materials that best meet the specific needs of your students and of your program model.

Step One.

Evaluate materials based on overarching considerations relative to your ESL/ELD philosophy and delivery model. There may be many sets of materials in consideration at this stage; only those materials that match your overall philosophy & model move to the next stage of evaluation.

Step Two.

Evaluate materials based upon nonnegotiable criteria related to ELLs. There should be fewer sets of materials at this stage; only those materials that *meet all* non-negotiables move on to the next stage.

Step Three.

Evaluate remaining options via a close review of additional considerations, using a district-specific or grade-by-grade rubric to identify and select the materials that best meet your specific requirements.

Step One: Overarching Considerations

Districts across the nation are engaged in a range of efforts to implement the Common Core State Standards (CCSS). A key aspect of the implementation is the overhaul of instructional materials so that they are aligned with the new standards and able to support the rigorous instruction called for in the CCSS. Working with ELL experts, linguists, and practitioners from 15 or more school districts, we have developed a step-by-step process to guide the evaluation and selection of instructional materials for ELLs. The process begins with an evaluation based upon general concerns, assumptions, and expectations that serve as a unifying foundation.

Confirm that materials have been designed and validated for use with ELLs.

Publishers often indicate that their materials have been developed with ELLs in mind or for specific use in programs for ELLs. A series of names of writers and/or researchers may be mentioned as having collaborated, but in order for schools and districts to confidently rely on these claims, there is a need for greater transparency on the following:

- Which researchers were included in the design phase of materials, and what was/is their level of involvement (authors, reviewers of drafts, commissioned papers, research)?
- Who are the writers of the instructional materials, and what is their expertise on second language development?
- What is the evidence that the publisher's materials have been validated for use with ELLs? (Were ELLs included in the Beta-testing or pilots? In what districts? Is the typology of the ELLs specified? Was research conducted to confirm the intended design?)

Confirm that the philosophy and pedagogy related to English language acquisition establish high expectations.

Instructional materials must incorporate rich and complex text, chosen through both quantitative measures (readability) and qualitative measures (levels of meaning, structure, language conventionality and clarity, knowledge demands), to promote the development of sophisticated grade-level language and content knowledge for ELLs. Materials must attend to the role of language development in furthering conceptual understanding of content.

Confirm an explicit and substantive alignment of materials to the Common Core.

Correspondence to the new standards does not necessarily mean that there is an alignment of rigor and expectations. Publishers should show exactly where and how their materials align with CCSS, making use of correlation matrices and point-of-use references in their Teacher's Guide.

Once reviewers are in agreement that materials reflect close attention the above points, the review may proceed to Step Two.

Step Two: Non-Negotiable Criteria/Considerations for ELLs

Using the existing Instructional Materials Evaluation Tool (IMET), developed by Student Achievement Partners (SAP) and guided by the Publisher's Criteria [http://achievethecore.org/page/686/publisherscriteria], the Council developed a set of ELL considerations to serve as additional metrics. These considerations, critical for ELLs, have been developed for English Language Arts grades 3-12 and will also be developed for ELA grades K-2 and mathematics.

- For ELLs, non-negotiable criteria revolve around maintaining grade-level rigor, building knowledge while acquiring and building academic language (in English and/or other languages), and cultural relevance.
- The ELL-specific non-negotiable criteria seek to identify materials that
 - ✓ Provide ELLs with the necessary rigor in language development
 - ✓ Provide ELLs with full access to grade-level instructional content
 - ✓ Integrate scaffolding for ELLs without compromising rigor or content
 - ✓ Provide ELLs access to text that increases in complexity, with intentional connections between ESL and ELA instruction, all anchored in the CCSS

Criteria for CCSS-Aligned Instructional Materials for ELLs

(IMET with CGCS-Developed ELL Considerations)

The ELL considerations presented below are all considered non-negotiable for working with ELLs, in order to support rigorous instruction and learning through grade-level content aligned to the CCSS. These ELL-related non-negotiables are incorporated as additional metrics to the criteria in the SAP Instructional Materials Evaluation Tool (IMET)⁴; they aim to identify instructional materials (texts, tasks, and talk) that are designed to accelerate development of both academic language and grade-level content for ELLs and present a cohesive and coherent approach to developing and expanding concepts, content, thinking, and language.⁵

The IMET is divided into three distinct sections, each with a set of criteria for the selection of Common Core-aligned instructional materials:

Section I: *Non-negotiable criteria*. Only two criteria are classified as non-negotiable; both must be met in full for materials to be considered aligned to the shifts and major features of the CCSS.

Section II: *Alignment criteria*. This section includes seven additional criteria that play a vital role in the successful implementation of the CCSS with all students. Recommendations for the adoption of instructional materials will primarily rely on total scores calculated from the metrics in Sections I and II.

Section III: *Indicators of superior quality*. These are not criteria for alignment to the CCSS but have been included as examples of considerations that address the general quality of instructional materials.

⁵The criteria in this document deal specifically with grades 3-12; a companion document addressing grades K-2 will also be available.



⁴Based on the version scheduled for release in the second half of 2014.

NON-NEGOTIABLE
CRITERIA FOR
ALIGNMENT TO CCSS

METRICS

ELL METRICS— Non-negotiable considerations for ELLs

I. ELA Non-Negotiable Criteria – Student Achievement Partners, Instructional Materials Evaluation Tool for CCSS-ELA Alignment *Grades 3-12*

Non-Negotiable 1. COMPLEXITY OF TEXTS:

Texts are worthy of student time and attention; they have the appropriate level of complexity for the grade, according to both quantitative and qualitative analyses of text complexity.

- 1a) 100 percent of texts must be accompanied by specific evidence that they have been analyzed with at least one research-based quantitative measure for grade-band placement.
- 1b) 100 percent of texts must be accompanied by specific evidence that they have been analyzed for their qualitative features indicating a specific grade-level placement.
- 1c) The collective set of texts address/support ESL/ELD standards and language progressions in a spiraling and reciprocal manner without sacrificing content or rigor
- SUPPLEMENTAL MATERIALS.
 May focus on specific aspects or levels of ELD and/or language progressions across levels.
- 1d) The organization and sequence of texts are aligned to *grade-appropriate* content/themes/topics and are centered on history, science, and technical subjects to allow for development of grade-level language and content.
- 1e) Materials provide extended and sustained time on the themes and opportunities to reinforce and extend conceptual development and discourse-specific academic language that frames those themes/concepts.
- 1f) Materials include a range of grade-level and age-appropriate independent reading texts along a staircase of reading and linguistic complexity.
- 1g) In order to maximize instructional time focused on reading, materials include prereading activities that provide visual support, and other types of knowledge-building support, for new topics/themes as scaffolds for

visual support, and other types of knowledge-building support, for new topics/themes as scaffolds for building background knowledge on new themes/topics that might be unfamiliar. (Supplemental materials could provide this support but must be explicitly connected to the core text being read.)

Non-Negotiable 2. TEXT-DEPENDENT AND TEXT-SPECIFIC QUESTIONS:

At least 80 percent of all questions in the submission are high-quality text-dependent and text-specific questions. The overwhelming majority of these questions are text specific and draw student attention to the text.

- 2a) At least 80 percent of all questions and tasks should be text dependent to reflect the requirements of Reading Standard 1 (by requiring use of textual evidence to support valid inferences from the text).
- 2b) Questions and tasks accurately address the analytical thinking required by the standards at each grade level (Note: While multiple standards will be addressed with every text, not *every* standard must be addressed with every text.)
- 2c) Materials provide multiple opportunities for extended academic discourse through richly developed text-dependent and text-specific questions,. Materials also attend to the language that frames the concepts/ideas.

Section II: Alignment Criteria (ELL considerations are non-negotiable)

I. Range and Quality of Texts

1. RANGE AND QUALITY OF TEXTS:

Materials reflect the distribution of text types and genres required by the standards.

- 1a) Materials pay careful attention to providing a sequence or collection of texts that build knowledge systematically through reading, writing, listening, and speaking about topics under study.
- 1b) Within a sequence or collection of texts, specific anchor texts of grade-level complexity (keystone texts) are selected for their quality as being worthy of especially careful reading.
- 1c) In grades 3-5, literacy programs shift the balance of texts and instructional time to 50 percent literature/50 percent informational high-quality text. In grades 6-12 ELA materials include substantial attention to high-quality nonfiction.
- 1d) A large majority of texts included in instructional materials reflect the text

- 1f) Materials integrate culturally responsive, high quality texts that tap into student assets to deepen understanding and expand knowledge.
- 1g) Texts include sections where text complexity (both qualitative and quantitative) is called out or highlighted, with specific emphasis on linguistic or structural complexity
- 1h) Materials include annotated deconstruction of text that reveals the linguistic complexity and the richness of the language with regard to syntax and use of literary devices across genres, registers, and content.

characteristics and genres that are specifically required by the standards at each grade level.

1e) Additional materials markedly increase the opportunity for regular independent reading of texts that appeal to students' interests to develop both knowledge and love of reading.

II. Questions and Tasks

2. QUESTIONS SUPPORT STUDENT LEARNING:

They support students in building reading comprehension, in finding and producing the textual evidence to support their responses, and in developing grade-level academic language.

- 2a) High-quality sequences of textdependent questions are prevalent and can address any of the following: sustained attention to making meaning from the text, rereading to gain evidence and clarity, and the acquisition of foundational skills.
- 2b) Questions and tasks support students in unpacking the academic language (vocabulary and syntax) prevalent in complex texts.
- 2c) Questions build to a deep understanding of the central ideas of the text.

2d) Materials provide the opportunity for students to learn to identify whether the text is narrative or expository and, using that knowledge, examine language and text structure to achieve deeper comprehension (e.g., How did the setting impact the story? Which paragraph shows how the problem was resolved?)

III. Writing to Sources and Research

3. WRITING TO SOURCES AND RESEARCH:

Written and oral tasks at all grade levels require students to confront the text directly, to draw on textual evidence, and to support valid inferences from the text.

- 3a) Writing to sources is a key task. Students are asked in their writing to analyze and synthesize sources, as well as to present careful analysis, well-defended claims, and clear information.
- 3b) Materials place an increased focus on argument and informative writing in the following proportions. Alternately, they may reflect blended forms in similar proportions (e.g., exposition and persuasion):

	persuasionji					
	Grades 3-5	exposition 35%	persuasion 30%	narrative 35%		
	Grades 6-8	exposition 35%	argument 35%	narrative 30%		
	Grades 9-12	exposition 40%	argument 40%	narrative 20%		

3c) Writing opportunities for students are prominent and varied.

- 3e) Mentor texts are routinely used across writing genres and registers as the main vehicle of writing instruction.
- 3f) Materials require students to engage, at regular intervals, in mini writing tasks that enable ELLs at all ELD levels to develop the linguistic repertoire needed to perform extended and increasingly complex informative and argumentative writing tasks.
- 3g) Instruction offers routine and systematic practice and opportunities for guided/shared writing events to explore linguistic and rhetorical patterns across genres.

3d) Extensive practice is provided with short, focused research projects.

Materials require students to engage in many short research projects annually to enable students to develop the expertise needed to conduct research independently.

IV. Foundational Skills

4. FOUNDATIONAL SKILLS:

Materials provide explicit and systematic instruction and diagnostic support for concepts of print, phonics, vocabulary, syntax and fluency. These foundational skills are necessary and central components of an effective, comprehensive reading program designed to develop proficient readers with the capacity to comprehend texts across a range of types and disciplines.

- 4a) Submissions address grade-level CCSS for foundational skills by providing instruction in concepts of print, phonological awareness, letter recognition, phonics, word recognition and/or reading fluency in a research-based and transparent progression.
- 4b) Opportunities are frequently built into the materials for student to achieve reading fluency in oral and silent reading, that is, to read on-level prose and poetry with accuracy, at a rate appropriate to the text, and with expression.
- 4c) Materials guide students to read with purpose and understanding and to make frequent connections between acquisition of foundation skills and making meaning from reading.

- 4d) Materials are connected to grade-level content and incorporate a contextualized approach to teaching such foundational skills as phonemic awareness, phonics, and vocabulary/ syntax/fluency development.
- 4e) Instruction for building foundational skills should attend to comparative linguistics, building on phonological and orthological similarities between English and home language(s), while also highlighting differences.

V. Language

5. LANGUAGE:

Materials adequately address the Language standards for the grade.

- 5a) Materials address the grammar and language conventions specified by the language standards at each grade level.
- 5b) Materials provide the opportunity for students to confront their own error patterns in usage and conventions and correct them in a grade-by-grade pathway that results in college and career readiness by 12th grade.
- 5c) Materials provide a mirror of real-world activities for student practice with natural language (e.g., mock interviews, presentations).
- 5d) Materials must consider how mastery of language conventions develops along a non-linear progression, and they should support ELLs in engaging with grade-level-appropriate, complex grammatical structures while attending to the language conventions, patterns and usage errors typical of second language learners. By attending to typical error patterns, ELLs develop the ability to recognize and self-correct these errors.
- Professional development for teachers should include theory

and practice related to language acquisition, in order that they may use grade-level expectations as a general guide and not a fixed rule.

5e) Materials pay explicit attention to, and engage students with, academic language, its features, functions, and grammar in service of meaningful academic work.

VI. Speaking and Listening

6. SPEAKING AND LISTENING:

To be CCSS-aligned, speaking and listening are integrated into lessons, questions, and tasks. These reflect a progression of communication skills required for college and career readiness as outlined in the standards.

- 6a) Texts used in speaking and listening questions and tasks must meet the criteria for complexity, range, and quality of texts (non-negotiable and alignment criterion 1).
- 6b) Materials provide the opportunity for students to engage effectively in a range of conversations and collaborations by expressing well-supported ideas clearly and building on others' ideas.
- 6c) Materials develop active listening skills, such as taking notes on main ideas, asking relevant questions, and elaborating on remarks of others in a gradeappropriate way.
- 6d) Materials build in frequent opportunities for discussion and, through directions and modeling, encourage students to use academic language in their speech.
- 6e) Materials require students to marshal evidence when speaking.

- 6f) Materials offer linguistic frames across language progressions as support for speaking in discipline-specific academic registers.
- 6g) Materials provide frames for conducting accountable academic conversations that require clarification, elaboration, consensus, etc.
- Questions and tasks must remain grade-level appropriate, while considering the student's spoken English proficiency
- 6h) Materials include multiple opportunities for students to listen to authentic models of academic English across genres and registers, providing insight into disciplinary demands and features across genres while calling attention to the cultural differences in thought and writing patterns.
- 6i) Materials provide substantial support for receptive listening skills, through note-taking and other active listening techniques, while providing ongoing feedback on the comprehension of texts read aloud.
- 6j) Materials incorporate evidencebased approaches, strategies, and resources so that all ELLs (e.g., SIFE, literate in primary language,

long-term ELL, varying levels of English proficiency, etc.) may attain grade-level standards.

VII. Access to the Standards for All Students

7. ACCESS FOR ALL STUDENTS:

Because the Standards are for all students, alignment requires thoughtful support to ensure all students are able to meet the same standards. Thus, materials must provide supports for English Language Learners and other special populations.

- 7a) The submission provides all students, including those who read below grade level, with extensive opportunities to encounter and comprehend grade-level complex text on a regular basis as required by the standards.
- 7b) Materials regularly include extensions and/or more advanced text for students who read or write above grade level.
- 7c) There are suggestions and materials for adapting instruction for varying student needs (e.g., alternative teaching approaches, pacing, instructional delivery options, suggestions for addressing common student difficulties, remediation strategies).
- 7d) Materials regularly and systematically direct teachers to return to focused parts of the text to guide students through rereading, discussion, and writing about the ideas, events, and information found there.

- 7e) Teacher resources provide instructional suggestions/ recommendations for scaffolding diverse students.
- 7f) Materials provide examples of student work, highlighting potential areas of linguistic challenge and offering related instructional guidance.
- 7g) Materials provide teachers with recommendations and/or links to access additional resources, materials, and texts for diverse student needs.
- 7h) Materials incorporate carefully chosen, age-appropriate visuals and graphic supports to activate prior knowledge and scaffold conceptual development. These graphics should be used to clarify concepts and relationships within the text that are critical to comprehension. All graphics and visuals that are chosen must be culturally respectful.
- 7i) Materials/texts emphasize or repeat a few contextualized linguistic/grammatical structures at a time so that students can access content and gain control over the academic language that frames them.
- 7j) In order to maximize instructional time focused on reading, materials include prereading activities that provide visual supports as scaffolds for building background knowledge on new themes/topics that might be unfamiliar. (Supplemental

materials could provide this support, but must be explicitly connected to the core text being read.)

7k) Digital materials and resources are of high quality, and are used as instructional tools to augment and support teacher instruction and student engagement.

71) Materials offer assessment opportunities for all four domains of second language acquisition and attend to ESL/ELD standards and language progressions--

- The assessment tools (e.g., diagnostic, formative, unit, etc.) should assist in monitoring student progress in literacy and second language development, including mastery of academic language functions, forms and structures within complex texts.
- Teacher resources support the use of assessment data to inform instruction

7m) Teacher resources provide guidance to distinguish between simply "meeting ELD standards" and achieving full comprehension of complex text, including guidance on building background knowledge pre-supposed by text.

Section III: Indicators of Superior Quality

I. Usefulness, Design, and Focus

- Do the student resources include ample review and practice resources, clear directions and explanations, and correct labeling of reference aids (e.g., visuals, maps, etc.)?
- Are the materials easy to use? Are they clearly laid out for students and teachers? Does every page of the submission add to student learning rather than distract from it? Are reading selections centrally located within the materials and obviously the center of focus?
- Can the teacher and student reasonably complete the content within a regular school year and does the pacing of content allow for maximum student understanding? Do the materials provide clear guidance to teachers about the amount of time the lesson might reasonably take?
- Do instructions allow for careful reading and rereading of content?
- Do the materials contain clear statements and explanation of purpose, goals, and expected outcomes?

ELL Metrics Scoring Sheet

Non-negotiable	ELL Metric			Score Point			
Criteria							
1. Complexity of Text	1c) The collective set of texts address/support ESL/ELD standards and language progressions	1	2	3	4		
	1d) The organization and sequence of texts is aligned to grade-appropriate	1	2	3	4		
	1e) Materials provide extended and sustained time on the themes & opportunities	1	2	3	4		
	1f) Materials include a range of grade-level and age-appropriate independent	1	2	3	4		
	1g) In order to maximize instructional time focused on reading, materials include	1	2	3	4		
2. Text-Dependent	2c) Materials provide multiple opportunities for extended academic discourse	1	2	3	4		
and Text-Specific	,		_	J	7		
Questions							
Alignment	ELL Metric	Sco	ore l	Poin	t		
Criteria							
1. Range and	1f) Materials integrate culturally responsive, high-quality texts that tap into	1	2	3	4		
Quality of Texts	1g) Texts include sections where text complexity (both qualitative and quantitative) is called out	1	2	3	4		
	1h) Materials include annotated deconstruction of text that reveals the linguistic complexity and the richness	1	2	3	4		
2. Questions and Tasks	2d) Students learn to identify whether the text is narrative or expository	1	2	3	4		
3. Writing to	3e) Mentor texts are routinely used	1	2	3	4		
Sources	3f) Materials require students to engage in mini writing tasks that enable ELLs at all ELD levels	1	2	3	4		
	3g) Instruction offers routine and systematic practice	1	2	3	4		
4. Foundational Skills	4d) Materials are connected to grade-level content & incorporate a contextualized approach to teaching foundational skills	1	2	3	4		
	4e) Instruction for building foundational skills should attend to comparative linguistics	1	2	3	4		
5. Language	5d) Materials must consider how mastery of language conventions develops	1	2	3	4		
	5e) Materials pay explicit attention to, and engage students with, academic language, its features	1	2	3	4		
6. Speaking and	6f) Materials offer linguistic frames across language progressions as support	1	2	3	4		
Listening	6g) Materials provide frames for conducting accountable academic conversations	1	2	3	4		
	6h) Materials include multiple opportunities for students to listen to authentic	1	2	3	4		
	6i) Materials provide substantial support for the receptive listening skills	1	2	3	4		
	6j) Materials incorporate evidence-based approaches, strategies, and resources	1	2	3	4		
7. Access for All	7e) Teacher resources provide instructional suggestions/recommendations for	1	2	3	4		
Students	7f) Materials provide examples of student work, highlighting potential areas of	1	2	3	4		
	7g) Materials provide teachers with recommendations and/or links to access add'l	1	2	3	4		
	7h) Materials incorporate visuals and graphic supports to activate prior knowledge	1	2	3	4		
	7i) Materials/texts emphasize or repeat a few contextualized linguistic	1	2	3	4		
	7j) In order to maximize instructional time focused on reading, materials include	1	2	3	4		
	7k) Digital materials and resources are of high quality, and are used as	1	2	3	4		
	7l) Materials offer assessment opportunities for all four domains	1	2	3	4		
	7m) Teacher resources provide guidance to distinguish between simply "meeting"	1	2	3	4		
Key: 1 = no eviden	ce, 2 = some evidence, 3 = sufficient evidence, 4 = extensive evidence Total Score						



Step Three: Additional Considerations and Grade-by-Grade Rubrics

The following represent additional considerations that may play a role in the evaluation process. Following a review of those additional considerations that may be relevant to your district, you may proceed to a detailed evaluation of the remaining instructional materials, using a grade-by-grade rubric, such as the one developed by the Council of the Great City Schools.

Additional Considerations: Cultural Relevance and Respect

For culturally responsive teaching, instructional materials selected for English Language Learners must be respectful and inclusive of all students' backgrounds: language, culture, ethnicity, race, gender, refugee, and immigration experience. The materials must pay special attention to cultural implications for ELL students, and must provide appropriate supports for teachers.

- Materials should offer a wide variety of culturally relevant texts, organized in appropriate themes/
 topics. Carefully selected texts and visuals can foster cross-cultural understanding and
 collaboration that is respectful of all individuals and groups, including native English
 speakers. Text sets should offer a range of views and perspectives and be deliberately
 structured in a sensitive manner to provide opportunities for all learners to engage meaningfully
 with each text. Texts must take special care to address sensitive subjects with respect, including
 where appropriate carefully chosen images and videos to build background and context.
- ELL students' backgrounds must be valued as assets in classrooms, as they bring rich experience to the learning environment. In order to support the learning environment, texts must acknowledge students' life experiences, and social and emotional development. Texts free of negative misconceptions or stereotypes are better able to support conceptual development, as they encourage students to acknowledge multiple perspectives, rather than undermining individuals' intellectual underpinnings.
- Teachers' resources should include explicit guidance for identifying culturally distinct discourse
 patterns and linguistic features within texts, highlighting similarities and/or contrasting
 differences. This guidance should include tasks and questions that are culturally respectful
 and that draw upon students' metalinguistic awareness and life experiences to guide
 intellectual exploration and discourse.

Additional Considerations: Student Materials and Support for Language Development

In general, the materials should be based on language acquisition research that supports that language is best acquired when taught through content, allowing students to link language to concepts.

ELLs need to engage in academic discourse with teachers and peers. They should use content and language development to enhance both vocabulary development and comprehension of the structure and function of the language being learned (L2). This concept of academic language expands current thinking around "vocabulary" to attend to the five nested components of language: phonological, lexical, grammatical, sociolinguistic, and discourse. [Scarcella, R. (2003). *Academic English: A conceptual framework*. University of California, Irvine.]

- Materials must be responsive and accommodate varying levels of English proficiency (or well-targeted for particular levels of proficiency, based on solid research and beta-testing with actual ELLs at those levels). They should highlight instructional practices for working with groups with diverse levels of language proficiency, but must avoid tagging instructional practices to specific levels of English proficiency. Linking specific instructional practices or expectations to specific English proficiency levels creates a very rigid approach to teaching that can lead to ELLs being labeled and taught on one level instead of progressing along a continuum. Materials should give students the opportunity to strive upwards.
- Materials should call out the language demands, challenges, and opportunities along the progression of language acquisition.
- Materials should provide text sets that are connected by an essential question or overarching theme and that ascend a staircase of complexity and include a variety of complex and compelling ("juicy") texts across a variety of genres.
- Text provided in Spanish (or any other language) should be authentic, high quality, and at a level of complexity that mirrors the language demands of the Common Core.
- Texts should represent the full range of content areas math, science, social studies, and more in support of district curricula.
- Materials should have a constant and clear reference to the CCSS, especially the language standards and practices.
- Materials should attend to the needs of students with interrupted formal education (SIFE), newcomers, and other students with specific needs.

Additional Considerations: Intervention

Intervention materials are selected to support specific diagnosed needs. It is assumed that intervention occurs after students have first had opportunities for quality instruction with differentiated support, and students demonstrate that they require additional intervention and focused instruction. Intervention strategies and materials will vary according to purpose, age, and grade level.

- Materials (texts, tasks, and talk) are designed to accelerate (rather than remediate) content learning and language development to present a cohesive and coherent approach to building and developing concepts, content, thinking, and language.
- Suggestions are provided for adapting and extending tasks to *support* and *expand* academic language development.
- Specific intervention materials may focus on particular aspects or levels of ELD and/or language progressions.
- Materials must provide progressions, student practice, and scaffolds that result in student access to grade-level content.
- Intervention materials must be linked to the core ELA materials and curriculum, and must include abundant grade-level content (e.g., texts, tasks, talk, topics/themes).

Additional Considerations: Teacher Materials and Professional Development

- Materials should not have scripted instruction. Publishers' materials should not usurp the district's curriculum, but rather support the district-created one.
- Materials should provide reflection/coaching suggestions rather than a script to follow.
- Materials should support teachers in scaffolding up rather than watering down, encouraging students to strive upwards and ensuring that ELLs are instructed with rigorous grade-level content.
- Materials ideally include samples of *more* structured units as guides for teachers, as well as others that are *less* structured, to allow teachers to take greater command of designing their units, as they feel more comfortable with the instructional shifts.
- Publisher should collaborate with districts to design customized professional development (PD) rather than rely on the publisher's generic PD outline.
- The materials' design should include spaces for collaborative conversations among students and with teachers; the PD should support teachers who need to learn how to do this.
- Ideally, the PD would support a virtual learning community for teaching and reflection, possibly including teaching videos.

Additional Considerations: Instructional Technology

Consistent with the *ELD 2.0* Framework and the language demands of the Common Core, the promotion of academic literacy in ELLs is more than 'teaching English.' Promoting academic literacy involves offering "access to the ranges of knowledge, abilities and forms of language" that in turn affords students a "participant status" in academic settings. (Hawkins, 2004) Such promotion of academic literacy acknowledges the social and communicative nature of language learning and literacy development. (Parker, 2007)

New technologies can be a valuable tool to facilitate the process of promoting academic literacy for ELLs. The use of computers and the Internet can provide support for extensive and independent reading and writing, assist with language scaffolding, and provide opportunities for authentic research and publication. (Warschauer et al., 2004) Moreover, the Internet can be an important source for instructional materials in native language and can afford educators substantially greater alternatives for fostering language learning with contextual and cultural depth. (Castek, 2007)

The effectiveness of projects that use technology, however, does not lie in the technology itself, but in the purposeful use of technology to meet the needs of students. (Durán, 2007) Technology can play an important role in the construction of productive learning environments for young English learners. (Parker, 2007)

When selecting digital or technology-based modalities of instructional materials for ELLs, districts must consider how these fit into a larger vision of instruction for ELLs, and how teachers will use technology to extend literacy development and enhance access to rigorous content.

Key considerations include:

- a) Technology cannot be seen as a single factor to transform instruction; rather, technology is used to support students in their development of academic literacy through—
 - promotion of independent reading
 - support for language scaffolding
 - facilitating involvement in cognitively engaging projects
 - student analysis and creation of purposeful texts in a variety of media and genres (Warschauer et al., 2004)
 - simulating different contexts of language use, providing ELLs practice with vocabulary and literary devices across content areas and registers. Technology can help create virtual settings in which students can see how language transforms itself depending on the particular context (like the playground and the classroom), social institutions (like school and home) and practices (like games and lessons). This will counter language instructional practices that are abstract and decontextualized. (Gee, 2004)

- b) Digital materials must provide contextual integration of vocabulary instruction to facilitate reading comprehension and academic language proficiency.
- c) The use of technology in language and literacy instruction needs to extend beyond basic reading skills to higher-level literacy and communication skills.
- d) Digital modalities should not be a stand-alone resource; rather, they should be integrated with teacher tools and delivery methods to create a technology-mediated learning environment. (Rueda, 2007) Teacher resources should include supports and models that demonstrate how to effectively integrate technology to meet the needs of students in the classroom.
- e) Effective classroom integration of digital materials calls for—
 - language input that is of high quality
 - ample communicative opportunities for practice in various social, cultural, and academic contexts (registers)
 - feedback that is timely, meaningful, and of high quality
 - content that is individualized for the student's unique needs. (Zhao and Lai, 2007)

Instructional Technology References

Castek, J. et al. (2007). Developing new literacies among multilingual learners in the elementary grades, Chapter 4 in L.L. Parker (Ed.) Technology-mediated learning.

Durán, Richard P. (2007) Technology and literacy development of Latino youth, Chapter 2 in L.L. Parker (Ed.) Technology-mediated learning.

Gee, J.P. Reading as situated language: A sociocognitive perspective. In R.B. Ruddell &H.J. Unrau (Eds.) Theoretical models and processes of reading (5th ed. 2004; pp. 116-132). Newark, DE: International Reading Association.

Hawkins, M.R. (2004) Researching English language and literacy development in schools. Educational Researcher 33 (3), 14-25.

Parker, LL. (Ed.) (2007) Technology-mediated learning environments for young English learners. New York: Routledge.

Rueda, Robert. (2007) Literacy and English learners: Where does technology fit? Chapter 2 Reflection in L.L. Parker (Ed.) Technology-mediated learning.

Warschauer et al. (2004) Promoting academic literacy with technology: Successful laptop programs in K-12 schools, Elsevier Ltd.

Zhao, Y. and Lai, C. (2007) Technology and second language learning: Promises and problems. Chapter 5 in L.L. Parker (Ed.) Technology-mediated learning.

Appendix: Matching Instructional Materials to Your Program Design

ENGLISH LANGUAGE ARTS (ELA)

CORE ELA MATERIALS

Collective set of CCSSaligned materials for Core ELA Instruction

Example 1

District may select a comprehensive/structured ELA program with all key components typically provided by one vendor. These materials may be more prescriptive and offer specific lesson plans and instructional guidance in the context of a planned scope and sequence.

Materials typically include:

- Core ("basal") student text(s)
- TE with specific (often prescriptive) guidance for instruction
- Related ancillaries which provide for word/language study, foundational skills, and other practice
- Formative & summative assessment

-OR-

Example 2

District may select a comprehensive/flexible set of materials; this set is a less structured collection. Key components may be from one or several vendors and may be selected to support/align to district- developed "Units of Study."

Materials may include a variety of student texts (for guided instruction, independent, etc.) and related student and teacher resources.

Both Example 1 and Example 2 will likely provide CCSS-aligned materials and may also provide student-accessible tools and resources for:

- Word/language study
- Foundational skills
- Digital resources
- Assessment (formative; may also include diagnostic, summative)

Core ELA materials for ELLs must also provide for embedded, complementary, or distinct supports for a range of language proficiency levels and other needs, including deliberate academic language development, in both Teacher's Guide and student materials.

SUPPLEMENTAL ELA

Materials to address gaps in Core Materials

District selects supplemental materials for specific purposes:

To Fill Gaps in Core Materials:

Selected Core ELA Materials lack specific components needed for instruction (e.g., word study, ELL resources, etc.).

To Enrich and Supplement ELA Core Materials:

Additional materials may be selected to enrich and expand ELA, such as:

- Additional student texts
- Targeted support materials (e.g., writing, language, word study, etc.)
- Classroom libraries
- Digital resources

Supplemental ELA Materials for ELLs may be chosen to fulfill either purpose:

- *To address ELL-specific needs:* filling gaps in core materials (e.g., explicit language support, appropriate texts, etc.)
- *To enrich and support:* Providing additional reading/writing materials, digital resources to supplement language development, etc.

ELA INTERVENTION

Materials for Intervention & Support

District selects materials to be used *in addition to* (not to replace) core ELA materials, for specific purposes:

To provide targeted intervention for a diagnosed need: May be a component of district's MTSS/RTI program.

ELA Intervention Materials designed for ELLs:

These materials must distinguish between language needs and literacy needs and must target specific needs for additional instruction and support.

ENGLISH LANGUAGE DEVELOPMENT (ELD)

CORE ELD MATERIALS

Selection of ELD materials is dependent upon a district's approach to ELD and ELA instruction.

Combined ESL/ELD Class (ELD instruction is embedded within/a part of ELA):

An ELD Class/Course designed for ELLs that combines ELA and ELD, typically with no other core ELA instruction. (In this context, ELD replaces ELA for ELLs.) Core ELD materials must, therefore, be comprehensive (either structured or flexible), providing for both ELA and ELD.

Core ELA materials (see above), along with Focused ELD and/or selected supplemental materials, constitute the Core ELD materials.

Materials are designed for ELLs and provide for grade-level CCSS-aligned ELA (with texts, teacher resources, etc.) Materials may include supplemental texts to support varying English language proficiency levels, reading/writing levels, and ELL needs. Materials promote accelerated literacy and academic language development (e.g., Discipline-specific Academic Language Expansion – DALE) and include a strong language study component. Separate ESL/ELD Classes (ELD instruction occurs separately from/in addition to ELA): Students receive standards-aligned ELA instruction and focused ELD (Focused Language Study - FLS). Materials for Core ELA are provided as noted in ELA Core (above). In addition, materials for Focused ELD (Focused Language Study) target language development. Materials complement selected ELA core materials and provide instruction and support for related language demands. They are designed for ELLs at varying levels of English language proficiency and with varying language and literacy backgrounds. Materials focus on language study and language development and align/ build toward CCSS and ELD standards and language progressions. They may include supplemental texts to support varying English language proficiency levels, reading/writing levels, and ELL needs and to promote accelerated literacy and language development (e.g., Discipline-specific and Academic Language Expansion-DALE). SUPPLEMENTAL ELD As with ELA, supplemental materials may be for either purpose: To Fill Gaps in Core ELD Materials (e.g., explicit language support, appropriate texts, etc.) *To Enrich and Support:* Provide additional reading/writing materials, digital resources to supplement language development, etc. **ELD INTERVENTION** As with ELA, intervention materials are in addition to (not a replacement for) core ELD materials. Districts select intervention materials specifically to provide targeted intervention for diagnosed language development needs. (May be a component of district's MTSS/RTI program.) ELD Intervention materials are designed for ELLs; they distinguish between language needs and literacy needs, and target specific areas needing additional instruction and support.

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ELL PUBLISHERS PROJECT

Spurring the Improvement of Instructional Materials for ELLs

Project funded by The Bill & Melinda Gates Foundation & Televisa Foundation

Key Dates/Milestones:

- Spring, 2014: A "Call for Participation" was disseminated, requesting publishers to submit a proposal to enter into collaboration with CGCS district practitioners, with a goal of informing their ongoing development process, improving rigor and expectations for ELLs, and developing revised instructional materials to be piloted in Council districts. Proposals were reviewed by district panelists; five publishers were chosen to move forward with the project. (Amplify, Benchmark Education, Houghton Mifflin Harcourt, Imagine Learning, National Geographic Learning)
- June, 2014: The first collaborative discussion was held with publishers, in which
 district practitioners and ELL experts provided specific feedback to inform the
 development process. Participating districts include Los Angeles, San Diego, San
 Francisco, Denver, Buffalo, Palm Beach, Washington DC, Boston, Albuquerque. A
 summary of critical issues and guiding feedback is attached.
- Sept 29-30, 2014: A second collaborative discussion focused on evaluation of prototype units in development was held with publishers, each of whom were given 90 minutes to present and discuss their evolution of thought based on CGCS, expert, and district practitioner feedback. Participating districts in this phase included Los Angeles, San Diego, San Francisco, Denver, Buffalo, Palm Beach, Boston, and Albuquerque. (Imagine Learning dropped out of the project before this stage.) Publishers demonstrated substantial evolution; for example, panelists began to see more attention to vocabulary development at the phrasal level, as opposed to the individual word level. And, there was a clear effort to re-imagine the instructional architecture around scaffolding for ELLs, moving away from supports that pigeonhole students according to language proficiency level.
- **Feb/Mar, 2015:** Publishers will continue to develop pilot units that reflect new paradigms and, in the spring of 2015, will present pilot units (3-4 week modules) to CGCS/district panel for pilot consideration. Participating districts will choose the pilot(s) that represent the best fit for their context and model.
- March June, 2015: Piloting window (four months allowed to work around state accountability assessments)
- Fall, 2015: Results/feedback will be shared individually with publishers, then compiled and shared with The Bill & Melinda Gates Foundation and the Televisa Foundation team.

Planning for Common Core-aligned Professional Development

Project funded by the Helmsley Charitable Trust

Three working groups have been formed (ELA, Math, Delivery) to engage in a six-month planning project; the outcome will be a detailed, scalable plan to deliver Common Core-aligned professional development, focused on teachers of high-needs students, across CGCS member districts. Each working group includes a mix of expert/academicians and district practitioners. (*Team matrix attached*)

Key Dates/Milestones (2014):

- July-August: Council staff engaged in preliminary research to inform this project, e.g., launched a preliminary survey to learn more about member district implementation of PD around the CCSS, conducted an online review to explore current online PD resources to support teachers of high-needs students in addressing the instructional shifts of the Common Core.
- **Sept. 5:** An Introductory webinar was hosted for participating expert and district panelists.
- **Sept. 12:** The first virtual work sessions were held by the ELA and Math teams, with Delivery team members invited to join either or both sessions. Objectives for this session were to establish common understandings and goals.
- October 3: The second virtual work sessions were held by both teams. Objectives
 for this session were to begin to narrow content/scope/focus and to begin
 thinking about how to operationalize the work in a practical sense.
- October 20: Face-to-face meeting in Milwaukee, WI. Objectives for this all-day
 work session will be to pin down specific content and architecture for ELA and
 Math. Teams will work separately, but will also convene to discuss commonalities
 so that plans for the two content areas are connected, coherent, and cohesive.
- November 7: Both content teams will meet in a shared virtual work session to pin down remaining key/shared considerations and finalize the content and architecture. The Delivery team will participate, to inform their work in upcoming sessions.
- November 14: The Delivery team will convene in their first dedicated virtual work session to define and grapple with delivery issues (platform, required assets, key elements, etc.).

- **November 20-21:** The Delivery team will meet face-to-face to finalize recommendations.
- **December 2014:** All teams will convene for a webinar to discuss final recommendations. Internal/CGCS staff will collaborate on recording, synthesizing, and drafting a final report.
- **January 2015:** The final report with recommendations and an action plan will be presented to the Helmsley Charitable Trust team.

Recommendations to ELL Publishers from June Meeting

(with page references to *Instructional Materials for ELLs* document)

Materials must reflect appropriate instructional design.

Materials must be organized around carefully selected text sets that are compelling, cohesive, complex, and content rich. (See p.23 of the *Instructional Materials for ELLs* tool.) All texts, tasks, and graphics must be carefully chosen to be age- and grade level-appropriate and culturally respectful (pp.14, 19). Students must consistently encounter multiple opportunities to read across connected texts of various genres, grappling with essential questions, and exploring and discussing diverse points of view on important themes (pp.14-15).

Development and expansion of language and grade-level content must be contextualized (rooted in the texts; see pp. 6-7), dynamic, collaborative, and interactive, and must occur within a supportive environment that differentiates and scaffolds for a range of learners without ever sacrificing rigor (pp.13-14). All instruction must be visibly and substantively aligned to standards, and vertically aligned to ensure ongoing opportunities to develop, expand, and enrich knowledge from year to year (p.12).

Materials must reflect the rigor required to meet new standards.

Increasing rigor in both instruction and instructional materials for ELLs is as crucial as it is complex, because it requires higher expectations and more rigorous instructional experiences for both language development and content knowledge.

The Instructional Materials for ELLs tool further highlights and elaborates a set of critical elements related to rigor. For example, the Effective Instructional Practice and Program Model and Delivery Options sections call for ELL materials to be explicitly connected to the district's core instructional program. The Theory of Action for ELLs and the Common Core calls for intellectually demanding materials that lead to rigorous learning outcomes for ELLs, and sets the expectation for grade-level appropriate materials with rich content. Text selections must be complex and challenging; publishers must not shy away from complexity because of a fear that students will encounter ambiguity. It is this complexity and ambiguity within text that, with the appropriate scaffolds, can lead to productive struggle and the development of advanced language skills.

Instructional materials must provide ELLs with access to texts that increase in complexity, identifying opportunities for language expansion across the curriculum, and must provide acceleration (rather than simple remediation) through all intervention materials or programs.

Materials must reflect careful attention to <u>text</u> selection.

As emphasized in *Step Two: Non-negotiable Criteria/Considerations for ELLS*, the selection of complex texts must rely on both quantitative AND qualitative measures, assuring selections from multiple genres that are rich, compelling, authentic, high-interest, and

engaging (p.14). Instructional materials selected for ELLs must strongly consider culturally relevant text, implications for ELL students, and support for teachers. For culturally responsive teaching, materials must be respectful and inclusive of all students' backgrounds: language, culture, ethnicity, race, gender, refugee, and immigration experience, and must incorporate culturally respectful, age and grade level-appropriate language, content, images, and videos.

Selections should be organized in well-crafted units of study that spiral across grade bands to create vertical alignment. Connecting carefully selected, diverse and complex texts across grade bands supports a staircase of complexity, developing depth of knowledge, expanding conceptual learning, and developing English for academic purposes through contextualized reading, evidence-based oral and written discourse, and active listening. These units of study must provide ample opportunities for students to engage with content-rich, complex text that is connected to essential questions that are investigative in nature.

Texts must be written in appropriately complex language, crafted with sophisticated vocabulary (with a strong emphasis on academic/tier 2 vocabulary in context). Materials should provide opportunities for text-connected oral and written discourse, close reading with text-dependent questions, and frequent opportunities for text-connected writing tasks. Where necessary and appropriate, contextualized reading foundation skill instruction should be provided. Texts offer well-crafted themes that extend across grade bands and provide vertical alignment to address the staircase of complexity (p.14).

Materials must reflect a strong emphasis on the development of <u>academic language</u>.

Instructional materials in specific content areas must also focus on developing the language skills required for literacy and academic growth (p.4, *Theory of Action for ELLs & the Common Core*). Such development must go beyond the level of vocabulary learning to promote the learning of grammatical structures required for academic discourse.

Materials must be concerned with the acquisition of skills required for text understanding and interpretation across the curriculum, and for ways of thinking and expressing ideas - in speaking and writing - in various areas of study (pp. 5-6) through extended instructional conversations between teachers and students, and between/among peers (pp.17-18).

Of great concern is encouragement for the primary languages and cultures of English learners to be regarded as assets and resources rather than as barriers to learning, and to support access to materials where such support is possible (p.4).

UNACCOMPANIED MINORS

Estimates of Unaccompanied Minors Arriving in Great City Schools

Background

The recent surge in the number of unaccompanied minors entering the nation is only a subset of the constant increase that has been taking place over the past two years in many of the Council member districts. The students are not necessarily recorded as 'unaccompanied minors' as districts refrain from asking for immigration information. Many, however, are likely to be recorded as 'immigrant children and youth' pursuant to the definition of Title III Part C of the ESEA *No Child Left Behind Act*.

The lack of a definition for 'unaccompanied minors' in the ESEA and the districts' obligation under *Plyler*, pose significant challenges to providing accurate estimates such students in the most recent school year (2013-14) or generating reliable projections the school year that just began (2014-15). Nonetheless, the Council of the Great City Schools conducted a survey over the summer to obtain trends and projections related to the enrollment of immigrant children and youth.

Enrollment and projections of immigrant children and youth in CGCS member districts

Based on the responses of 43 percent of our districts (29 districts) to the survey we found that—

- Close to 60 percent of the reporting districts experienced a noticeable increase in the enrollment of immigrant children and youth in 2013-14. Some districts saw increased of up to 1,000 additional such students. These children and youth include both those who might be classified as 'unaccompanied minors' but also those young children who are arriving only with their mothers.
- For more than 7 districts, the increase occurred mostly in the second half of the schools year (Jan-May 2014).
- Close to half of the responding districts reported that immigrant students are coming from Guatemala, El Salvador, and Honduras.
- Over 93 percent of the 29 responding districts anticipate increased enrollment for the upcoming fall 2014-15.

Enrollment estimates of unaccompanied minors at the national level

The district-reported increased enrollment of immigrant children and youth coming from Guatemala, El Salvador, and Honduras likely includes unaccompanied minors. These trends are consistent with data according to the U.S. Customs and Border Protection that indicates that within the last five years the number of unaccompanied minors from El Salvador, Guatemala, Honduras, and Mexico crossing the southwest boarder has increased by 257 percent, from 18,200 in FY 2009 to 65,000 in FY2014. (See Table I. below.)

Table I. Arrival of Unaccompanied Minors in Fiscal Years 2009-2013 & Fiscal Year 2014 through August 31.

Country	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
El Salvador	1,221	1,910	1,394	3,314	5,990	15,800
Guatemala	1,115	1,517	1,565	3,835	8,068	16,528
Honduras	968	1,017	974	2,997	6,747	17,975
Mexico	16,114	13,724	11,768	13,974	17,240	14,702
Total	18,197	18,168	15,701	24,120	38,045	65,005

Source: U.S. Customs and Border Protection

State and county level data of unaccompanied minors placed with sponsors

In response to the Council's efforts, the Office of Refugee and Resettlement is disclosing state and county-level numbers of unaccompanied minors who have been placed with a sponsor. Our analysis of the data show that between January 1 to August 31—

- Based on reported state-by-state figures, a total of 43,419 unaccompanied minors have been placed with a sponsor.
- Based on reported county-level figures, a total of 34,456 unaccompanied minors have been placed in 137 counties with 50 or more UAC.

Family units apprehended

Based on information from U.S. Customs and Border Protection, there have been 66,127 family units apprehended in the Southwest Border between October 1, 2013-August 31, 2014. No further disaggregated data are available regarding where these families are being detained.

District Concerns

In response to the CGCS Survey, districts indicated challenges arising due to the increased enrollment of immigrant students, including—

- The lack of reliable information regarding the estimated number of unaccompanied minors placed within the attendance area of school districts is thwarting any timely preparation for enrolling and meeting the students' various needs.
- Classroom and staff capacity for SY 2014-15.
- Funding for the anticipated increase of immigrant students in SY 2014-15.
- Accurate identification and data tracking of newcomers, SIFE, and refugee students.
- Collaboration with local and federal agencies to address the need of immigrant students.
- Meeting the social, emotional, and academic need of newcomers, SIFE, and refugee students, including PD for school administrators, teachers, and staff.
- School accountability, effects on attendance, and dropout rates as immigrant students move in and out of areas.

Federal and State legal efforts for unaccompanied minors

Limited help at the federal level has been provided to communities or school districts in which unaccompanied minors are being placed with sponsors. The Department of Education released FAQs providing guidance for school districts on the existing resources for unaccompanied minors and sponsors. See http://www2.ed.gov/policy/rights/guid/unaccompanied-children.html

Some funds have been made available to help provide legal assistance to unaccompanied minors who are facing deportation hearings without legal counsel. These efforts include-

- The Department of Health and Human Services will allocate \$9 million over the next two years for legal representation for about 2,600 unaccompanied minors.
- California Governor Jerry Brown approved a bill to provide \$3 million in legal aid for UAC.
- San Francisco voted to allocate \$2.1 million for legal services to unaccompanied minors and families.
- The City of New York announced that it will allocate \$1.9 million in legal aid for unaccompanied minors.
- Oakland Unified School District voted to accept foundations grants to hire an unaccompanied minors consultant to work with the number of unaccompanied number in the district for one year.

As of October 6, 2014, following districts have completed the Council's Unaccompanied Minors Survey—

- 1. Anchorage School District
- 2. Atlanta Public Schools
- 3. Baltimore City Public Schools
- 4. Broward County Public Schools
- 5. Buffalo City School District
- 6. Charleston County School District
- 7. Clark County School District
- 8. Cleveland Metropolitan School District
- 9. District of Columbia Public Schools
- 10. Fresno Unified School District
- 11. Hawaii Department of Education
- 12. Houston Independent School District
- 13. Kansas City Schools
- 14. Miami-Dade County Public Schools
- 15. Milwaukee Public Schools
- 16. Minneapolis Public Schools
- 17. Oakland Unified School District
- 18. Omaha Public Schools
- 19. Pittsburgh Public Schools
- 20. Providence Public School District,
- 21. Sacramento Unified School District
- 22. San Diego Unified School District,
- 23. San Francisco Unified School District
- 24. Santa Ana Unified School District
- 25. Seattle Public Schools
- 26. Shelby County Schools
- 27. St. Paul Public Schools
- 28. The School District of Palm Beach County
- 29. The School District of Philadelphia

Enrollment and projections of immigrant children and youth

Based on a survey conducted in the summer by the Council, figures and enrollment projections were provided by close to 43 percent of our districts, or 29 districts.

To participate in the survey, please visit: https://www.surveymonkey.com/s/2ZNTK3X.

UAC Placed with Sponsors by State and County Levels

	January 1-July 31, 2014	January 1-August 31, 2014	"Net Change"
UAC placed by state-level	37,477	43,419	5,942
UAC placed by county-level	29,890	34,456	4,566
UAC placed in counties with CGCS districts	11,592	16,451	4,859

	January 1-July 31, 2014	January 1-August 31, 2014	
CGCS as % of UAC State total	31%	38%	
CGCS as % of UAC County total	39%	48%	

As of August 31, 39 percent of all UAC released at the state-level and 48 percent of UAC released at the county-level have been placed with a sponsor who lives in a CGCS member areas.

UAC Placed in Counties Served by CGCS Member Districts

The table lists counties served by CGCS member districts, and where 50 or more UAC have been placed with sponsors between January 1 and August 31, 2014. A total of 44 CGCS member districts operate within 44 out of the 137 counties where UAC have been placed, and account for 16,545, or 48 percent, of the total UAC placed during this period.

District	County Name and State	# of UAC placed Jan 1-July 31	# of UAC placed Jan 1-Aug 31	"Net Change"
1 ATLANTA PUBLIC SCHOOLS	FULTON COUNTY, GA	64	73	9
2 AUSTIN INDEPENDENT SCHOOL DISTRICT	TRAVIS COUNTY, TX	354	393	39
3 BALTIMORE CITY PUBLIC SCHOOLS	BALTIMORE CITY, MD	264	300	36
4 BIRMINGHAM CITY SCHOOLS	JEFFERSON COUNTY, AL	83	90	7
5 BOSTON PUBLIC SCHOOLS	SUFFOLK COUNTY, MD	384	423	39
6 BRIDGEPORT SCHOOL DISTRICT	FAIRFIELD COUNTY, CT	253	291	38
7 BROWARD COUNTY PUBLICS SCHOOLS	BROWARD COUNTY, FL	356	398	42
8 CHARLOTTE-MECKLENBURG SCHOOLS	MECKLENBURG COUNTY, NC	488	536	48
9 CHICAGO PUBLIC SCHOOLS	COOK COUNTY, IL	52	215	163
10 CINCINNATI PUBLIC SCHOOL	HAMILTON COUNTY, OH	130	152	22
11 CLARK COUNTY SCHOOL DISTRICT	CLARK COUNTY, NV	150	174	24
12 COLUMBUS CITY SCHOOLS	FRANKLIN COUNTY, OH	110	127	17
13 DALLAS INDEPENDENT SCHOOL DISTRICT	TARRANT COUNTY, TX	199	221	22
14 DENVER PUBLIC SCHOOLS	DENVER COUNTY, CO	58	64	6
15 DUVAL COUNTY PUBLIC SCHOOLS	DUVAL COUNTY, FL	140	155	15
16 EAST BATON ROUGE PARISH SCHOOL SYSTEM	EAST BATON ROUGE PARISH, LA	173	191	18
17 FORT WORTH INDEPENDENT SCHOOL DISTRICT	TARRANT COUNT, TX	199	221	22
18 FRESNO UNIFIED SCHOOL DISTRICT	FRESNO COUNTY, CA	93	107	14
19 HILLSBOROUGH COUNTY SCHOOL DISTRICT	HILLSBOROUGH COUNTY, FL	142	161	19
20 HOUSTON INDEPENDENT SCHOOL DISTRICT	HARRIS COUNTY, TX	50	3,231	3,181
21 INDIANAPOLIS PUBLIC SCHOOLS	MARION COUNTY, IN	132	151	19
22 JEFFERSON COUNTY PUBLIC SCHOOLS	JEFFERSON COUNTY, KY	87	67	-20
23 LONG BEACH UNIFIED SCHOOL DISTRICT	LOS ANGELES COUNTY, CA	1,993	2,313	320
24 LOS ANGELES UNIFIED SCHOOL DISTRICT	LOS ANGELES COUNTY, CA	1,995	2,313	320
25 METROPOLITAN NASHVILLE PUBLIC SCHOOLS	DAVIDSON COUNTY, TN	255	282	27
26 MIAMI-DADE COUNTY PUBLIC SCHOOLS	MIAMI-DADE COUNTY, FL	1,127	1,248	121
27 NEW ORLEANS PUBLIC SCHOOLS	ORLEANS PARISH, LA	237	256	19
28 NEWARK PUBLIC SCHOOLS	ESSEX COUNTY, NJ	250	277	27
29 NORFOLL PUBLIC SCHOOLS	NORFOLK CITY, VA	58	65	7
30 OAKLAND UNIFIED SCHOOL DISTRICT	ALAMEDA COUNTY, CA	242	281	39
31 OKLAHOMA CITY PUBLIC SCHOOLS	OKLAHOMA COUNTY, OK	97	110	13
32 OMAHA PUBLIC SCHOOLS	DOUGLAS COUNTY, NE	79	95	16
33 ORANGE COUNTY PUBLIC SCHOOLS	ORANGE COUNTY, FL	216	244	28
34 PROVIDENCE PUBLIC SCHOOL DISTRICT	PROVIDENCE COUNTY, RI	130	144	14
35 RICHMOND CITY SCHOOLS	RICHMOND CITY, VA	112	129	17
36 SAN DIEGO UNIFIED SCHOOL DISTRICT	SAN DIEGO COUNTY, CA	76	98	22
37 SAN FRANCISCO UNIFIED SCHOOL DISTRICT	SAN FRANCISCO COUNTY, CA	185	208	23
38 SANTA ANA UNIFIED UNIFIED SCHOOL DISTRICT	ORANGE COUNTY, CA	206	235	29
39 SEATTLE PUBLIC SCHOOLS	KING COUNTY, WA	104	124	20

District	County Name and State	# of UAC placed Jan 1-July 31	# of UAC placed Jan 1-Aug 31	"Net Change"
40 SHELBY COUNTY SCHOOLS	SHELBY COUNTY, TN	190	219	29
41 THE SCHOOL DISTRICT OF PALM BEACH COUNTY	PALM BEACH COUNTY, FL	785	891	106
42 THE SCHOOL DISTRICT OF PHILADELPHIA	PHILADELPHIA COUNTY, PA	147	160	13
43 NEW YORK CITY GEOGRAPHIC DISTRICT # 7	BRONX COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 8	BRONX COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 9	BRONX COUNTY	347	404	57
NEW YORK CITY GEOGRAPHIC DISTRICT #10	BRONX COUNTY	347	404	37
NEW YORK CITY GEOGRAPHIC DISTRICT #11	BRONX COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #12	BRONX COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #13	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #14	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #15	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #16	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #17	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #18	KINGS COUNTY	362	400	47
NEW YORK CITY GEOGRAPHIC DISTRICT #19	KINGS COUNTY	302	409	47
NEW YORK CITY GEOGRAPHIC DISTRICT #20	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #21	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #22	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #23	KINGS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #32	KINGS COUNTY			
NEW YORK CITY PUBLIC SCHOOLS	NEW YORK COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 1	NEW YORK COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 2	NEW YORK COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 3	NEW YORK COUNTY	54	63	9
NEW YORK CITY GEOGRAPHIC DISTRICT # 4	NEW YORK COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 5	NEW YORK COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT # 6	NEW YORK COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #24	QUEENS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #25	QUEENS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #26	QUEENS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #27	QUEENS COUNTY	578	676	98
NEW YORK CITY GEOGRAPHIC DISTRICT #28	QUEENS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #29	QUEENS COUNTY			
NEW YORK CITY GEOGRAPHIC DISTRICT #30	QUEENS COUNTY			
	NY Tot	al 1,341	1,552	211
Total UAC Placed in Count	ies Served by CGCS Member Distric	t 11,592	16,451	4,859

Note: Italicized counties appear more than once.

Updated: 10/7/14

(The following was an email sent to the Bilingual/Multicultural list-serv on September 2, 2014)

Dear ELL Program Directors,

We have been closely following the issues related to the summer's surge in unaccompanied minors and understand that many of our member district are experiencing increased enrollment of immigrant students for the upcoming school year. This email provides you with an update and links to resources that may be helpful.

- a) Immigrant enrollment survey. In mid-July we launched a survey via SurveyMonkey to obtain information from our membership regarding increases in the enrollment of immigrant student the past year and projected increased in the upcoming year (2014-15). To date we have information from 29 districts. Thank you to those who were able to respond. The information provided has been most helpful in our conversations with Department of Education officials and congressional staff. If you have not filled out the survey please do so by clicking here to respond.
- b) Guidance from federal agencies. The Council has been encouraging coordination between the Department of Education and the Department of Health and Human Services (HHS), as a result of this they have released a second Question and Answer sheet addressing enrollment processes and the new types of documents being presented by sponsors. Please click here—
 http://www2.ed.gov/policy/rights/guid/unaccompanied-children-2.pdf to read about:
 - Classification of unaccompanied minors as immigrant students or otherwise [they are not deemed to fall under the refugee classification]
 - Use of Release Verification forms from the Office of Refugee and Resettlement (ORR)
 - Data collection and Title III eligibility

You can access the initial FAQ released by the Department as well as other resources via this webpage: http://www2.ed.gov/policy/rights/guid/unaccompanied-children.html

- c) District-level estimates of unaccompanied minors released to sponsors. We have made it clear in our discussion with the Administration officials and congressional staff that our school districts need timely and reliable information to prepare for a smooth enrollment process for the newly arrived students. Citing concerns over privacy, particularly for small numbers of placed minors, HHS was only willing to release county-level data for unaccompanied children who have been placed with sponsors. HHS will be updating this list on a monthly basis. Please visit the following link to view the total number of unaccompanied minors placed between January 1-July 31, 2014 in the corresponding county(ies) to your district: http://www.acf.hhs.gov/programs/orr/unaccompanied-children-released-to-sponsors-by-county
- d) **Examples of member district practices.** Depending on the number of unaccompanied minors enrolling in your district, you may wish to have a centralized registration processes to facilitate the handling of documents that are new to district staff. If your enrollment process is more decentralized, consider providing a brief, one-page guidance regarding which documents are also acceptable when enrolling unaccompanied minors and how to handle these. Below are examples of

how some of our member districts have been registering and enrolling the newly arrived immigrant students:

- Central registration. All Verification of Release from the Office of Refugee Resettlement (ORR) centrally handled by ELL Office. These forms are accepted as a student's "proof of residency" in the school district's attendance area.
- Use of District-created Affidavits. Some districts have created their own Affidavits of Residence
 and of Date of Birth for minors who lack conventional forms of identification. In these cases,
 legal guardians are required to present a copy of their gas and water bill and complete the
 affidavits.
- Guidance for principals and educators. For districts that need to develop and provide guidance
 to its administrators and teachers for meeting the needs of newly arrived immigrant students,
 there are helpful resources here:
 - Colorín Colorado's Guidance and Resource page offers resources for working with unaccompanied minors. To view the page, please visit: http://www.colorincolorado.org/principals/unaccompanied/

e) Additional Resources for Sponsors and Minors.

A few districts have seen cases of sponsors not receiving sufficient information regarding legal services available for minors which has had an impact on the number of minors applying for asylum. For this reason, we are sharing resources from the Department of Justice, HHS, and the National Immigration Law Center that you may wish to share with sponsors:

- Legal Orientation Program for Custodians of Unaccompanied Minors—
 - English Version: http://www.justice.gov/eoir/probono/LOPCOverview-English.pdf
 - o Spanish Version: http://www.justice.gov/eoir/probono/LOPCOverview-Spanish.pdf
- Pro bono legal service providers in 30 states: http://www.justice.gov/eoir/probono/states.htm
- VERA Institute of Justice— http://www.vera.org/files/ducs-legal-access-project-pro-bono-referral-resource-guide_0.pdf
- National Immigration Law Center guidance to legal rights for unaccompanied minors: http://www.nilc.org/fedsresponsekids.html

BILINGUAL, IMMIGRANT, AND REFUGEE EDUCATION DIRECTOR'S MEETING

SAVE THE DATE

2015 Bilingual, Immigrant, and Refugee Education Directors Conference May 13-16, 2015 Charlotte, NC

May 13, 2015
Charlotte-Mecklenburg Schools site visits

*May 14-16, 2015*BIRE meeting

The Westin Charlotte 601 South College Street Charlotte, NC 28202 (704) 375-2600



LEADERSHIP, GOVERNANCE & MANAGEMENT TASK FORCE

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Urban School Leadership, Governance, and Management

2014-2015

Task Force Goals

To improve the quality of leadership in urban public education.

To improve the effectiveness of urban school boards

To lengthen the tenure of urban school superintendents

To enhance accountability, management, and operations of the nation's urban public school systems.

Task Force Co-Chairs

Jose Banda, Sacramento Superintendent Bill Isler, Pittsburgh School Board

MANAGING FOR RESULTS

Managing for Results in America's Great City Schools

2014

RESULTS FROM FISCAL YEAR 2012-13





To Members of the Council of the Great City Schools -

We are pleased to present the 2014 edition of *Managing for Results in America's Great City Schools* to the membership and the public. The report accompanies the web-based system, developed by TransAct Communications, Inc. Both the report and the web-based system are components of the *Performance Management and Benchmarking Project*, an initiative created by the Council of the Great City Schools to define, gather, and report data on key performance indicators (KPIs) in various non-academic operations of school district management. The operational areas include finance (accounts payable, cash management, compensation, financial management, grants management, procurement, and risk management); business services (food services, maintenance and facilities, safety and security, and transportation); human resources; and information technology.

We continue to improve our quality of service as it relates to the Performance Management and Benchmarking Project. The turnaround time from initial release of surveys to the release of results has dramatically improved. We launched a new "results preview" feature that reduced the time for districts to see their own data to only about 24 hours (the time it typically takes for data to undergo quality review by CGCS) after the data are submitted. And we also established a high level of stability and continuity from year to year. The surveys used in the past two cycles were identical, making the data collection process more predictable for districts.

Most charts in this report now include data quartiles. These quartile markers are color-coded with "stoplight colors" (green, yellow, red), where appropriate, to serve as a visual clue for where you might want to set your next benchmark targets. For example, if you see you are below the "red" quartile marker, you can set your target to be above that benchmark.

The members of the Council continue to find tremendous value in this project. It provides a source of national benchmarks, and serves as an important tool for performance management. The *Performance Management and Benchmarking Project* will continue to be one of the Council's most important initiatives and one of the most innovative and promising developments in public education in many years. The Council will continue to develop new performance measures that spur accountability and improvements in urban public school systems. A special thanks to Jonathon Lachlan-Haché, Special Projects Consultant for the Council, who has managed the project this past year, and to so many others who have lent their time and expertise to further these goals.

Michael Casserly Executive Director Council of the Great City Schools

Robert Carlson Director, Management Services Council of the Great City Schools

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INTRODUCTION

OVERVIEW

The Performance Management and Benchmarking Project

In 2002 the Council of the Great City Schools and its members set out to develop performance measures that could be used to improve business operations in urban public school districts. The Council launched the Performance Measurement and Benchmarking Project to achieve these objectives. The purposes of the project were to:

- Establish a common set of key performance indicators (KPIs) in a range of school operations, including business services, finances, human resources, and technology;
- Use these KPIs to benchmark and compare the performance of the nation's largest urban public school systems;
- Use the results to improve operational performance in urban public schools.

Since its inception, the project has been led by two Council task forces operating under the aegis of the organization's Board of Directors: the Task Force on Leadership, Governance, and Management, and the Task Force on Finance. The project's work has been conducted by a team of member-district managers, technical advisors with extensive expertise in the following functional areas: business services (transportation, food services, maintenance and operations, safety and security), budget and finance (accounts payable, financial management, grants management, risk management, compensation, procurement and cash management), information technology, and human resources.

Methodology of KPI Development

The project's teams have used a sophisticated approach to define, collect and validate school-system data. This process calls for each KPI to have a dearly defined purpose to justify its development, and extensive documentation of the **metric definitions** ensures that the expertise of the technical teams is fully captured. (The definitional documentation for any KPI that is mentioned in this report is included in the "KPI Definitions" section of each functional area.)

At the core of the methodology is the principle of **continuous improvement**. The technical teams are instructed to focus on operational indicators that can be *benchmarked* and are *actionable*, and thus can be strategically managed by setting improvement targets.

From the KPI definitions, the surveys are developed and tested to ensure the comparability, integrity and validity of data across school districts.

Power Indicators and Essential Few

The KPIs are categorized into three levels of priority—Power Indicators, Essential Few, and Key Indicators—with each level having its own general purpose.

- **Power Indicators:** Strategic and policy level; can be used by superintendents and school boards to assess the overall performance of their district's non-instructional operations.
- Essential Few: Management level; can be used by chief executives to assess the performance of individual departments and divisions.
- Key Indicators: Technical level; can be used by department heads to drive the performance of the higher-level measures.

This division is more or less hierarchical, and while it is just one way of organizing the KPIs, it is helpful for highlighting those KPIs that are important enough to warrant more attention being paid to them.

A Note on Cost of Living Adjustments

We adjust for **cost of living** in most cost-related measures. Regions where it is more expensive to live, such as San Francisco, Boston, New York City and Washington, D.C., are adjusted downward in order to be comparable with other cities. Conversely, regions where the costs of goods are lower, such as Columbus, OH, and Nashville, TN, are adjusted upwards.

FREQUENTLY ASKED QUESTIONS

Why do the charts in this report have axes labeled with numbers instead of district names?

Each bar chart in this report has axis labels that show the district ID number. This is done in order to keep the district data confidential.

How do I find my district's ID number?

You can contact CGCS at 800-394-2427 and ask for your KPI ID. Your ID is also shown (at top-right) when you log in to ActPoint® KPI (https://kpi.actpoint.com).

How do I get the ID numbers for all the other districts?

The ID numbers of other districts are confidential, and we do not share them without the permission of each district. If you would like to identify specific districts that are in your peer group in order to collaborate with them, please contact CGCS at 800-394-2427.

Why isn't my data showing? My district completed the surveys.

It is likely that your data was flagged for review or is invalid. To resolve this, log in and check the Surveys section of the website. You should see a message telling you that there are data that need to be reviewed.

It is also possible that you submitted your data after the publication deadline for this report.

In either case, it may be possible to update your data in the surveys. Once you do, your results will be reviewed and approved by CGCS or Trans Act within 24 hours of your submission. You will then be able to view the results online.

Can I still submit a survey? Can I update my data?

You may still be able to submit or edit a survey depending on the survey cyde. You will see a message saying "This survey is now closed" if the survey is dosed to edits. If you do not see this message, then updates are still allowed for the fiscal year.

If the surveys are still open, any data that is updated will need to be reviewed and approved by CGCS or TransAct before the results can be viewed online. You can expect your data to be reviewed within 24 hours of your submission.

Introduction Page 2

FINANCE

ACCOUNTS PAYABLE

Performance metrics in Accounts Payable (AP) focus on the cost efficiency, productivity, and service quality of invoice processing. Cost efficiency is measured most broadly with **AP Costs per \$100K Revenue**, which evaluates the entire cost of the AP department against the total revenue of the district. This metric is supported by a similar metric, **AP Cost per Invoice**, which compares against the number of invoices processed rather than district revenue.

Productivity is measured by **Invoices Processed per FTE per Month**, and service quality is captured, in part, by **Days to Process Invoices**, **Invoices Past Due at Time of Payment** and **Payments Voided**.

With the above KPIs combined with **staffing** and **electronic invoicing** KPIs, district leaders have a baseline of information to consider whether their AP function:

- Needs better automation to process invoices
- Is overstaffed or has staff that is under-trained or under-qualified
- Should revise internal controls to improve accuracy
- Needs better oversight and reporting procedures



LIST OF KPIS IN ACCOUNTS PAYABLE

Below is the complete list of Power Indicators, Essential Few, and other key indicators in Accounts Payable. Indicators in bold are those included in this report. (See "KPI Definitions" at the back of this section for more complete descriptions of these measures.) All other KPIs are available to CGCS members on the web-based ActPoint® KPI system.

POWER INDICATORS

AP Cost per \$100K Revenue

AP Cost per Invoice

Invoices - Days to Process

Invoices Processed Per FTE per Month

ESSENTIAL FEW

Invoices - Past Due at Time of Payment

Payments Voided

Payments Voided Due To Duplication

Payments Voided Due To Error

OTHER KEY INDICATORS

AP Staff - Accountants with AP Certificate

AP Staff - Accountants with CPA

AP Staff - Cost Per FTE

AP Staff - District FTEs per AP FTE

AP Staffing Ratio - Clerical and Support

AP Staffing Ratio - Managers

AP Staffing Ratio - Professionals

AP Staffing Ratio - Supervisors

Invoices - Percent Paid Electronically

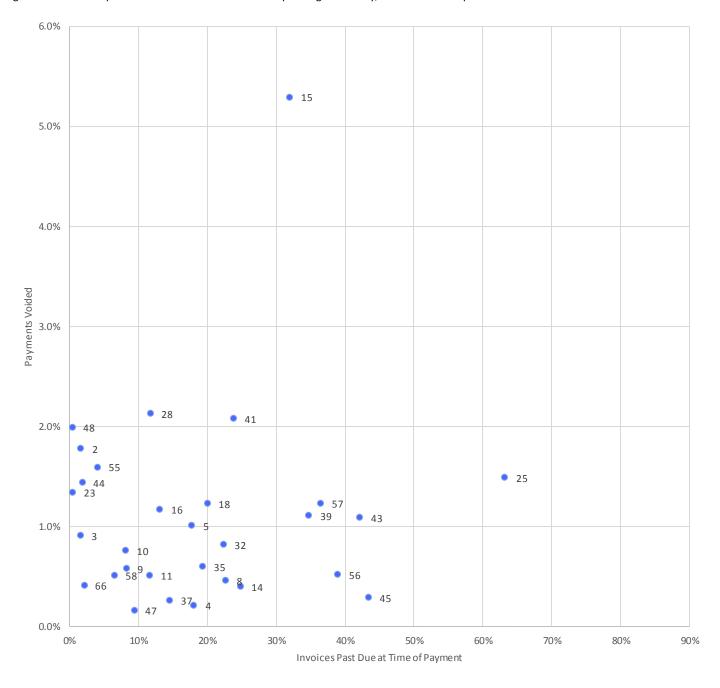
Invoices - Percent Received Electronically

Finance Page 4

FEATURED ANALYSIS

Figure 1
Payments Voided vs. Invoices Past Due

This scatter plot shows the percent of payments voided compared with the percent of invoices that were past due at the time of payment. These two KPIs should both be minimized, so the best-performing districts are those that are at the bottom-left of the chart. Districts that are far to the right or far to the top—or both—should track the corresponding KPI closely, and review their practices to move toward the bottom-left.



DATA DISCOVERY

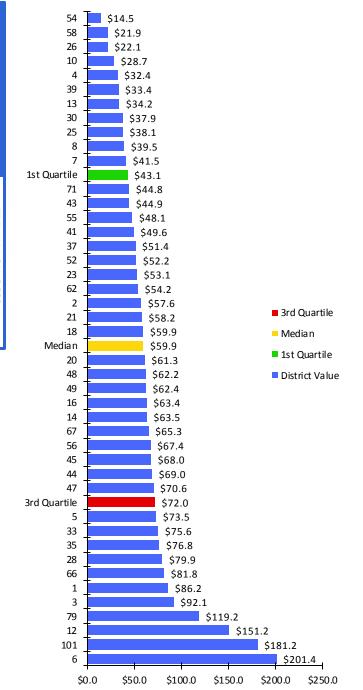
The following charts show the data from the *Power Indicators* and the *Essential Few* in Accounts Payable. There are also guiding questions to encourage critical thinking about your district's data. See the "KPI Definitions" at the back of this section for more complete descriptions of these measures.

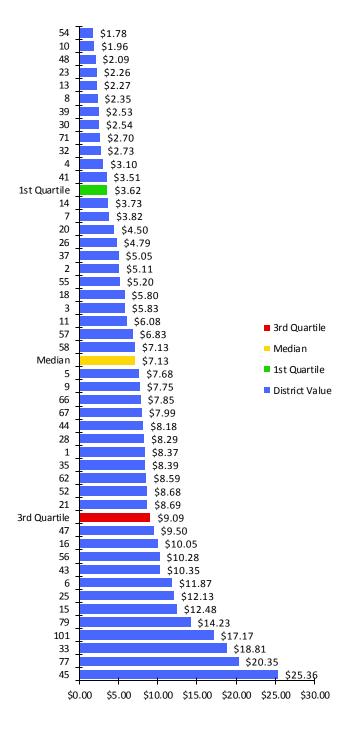
Figure 2
AP Cost per \$100K Revenue

This is the total AP department cost relative to the district's total operating revenue. *Not adjusted for cost of living.*

Figure 3
AP Cost per Invoice

This is the total AP department cost relative to the number of invoices that were processed. *Adjusted for cost of living.*





Finance Page 6

Figure 4
Invoices – Days to Process

Average processing time can reflect the efficiency of the AP department.

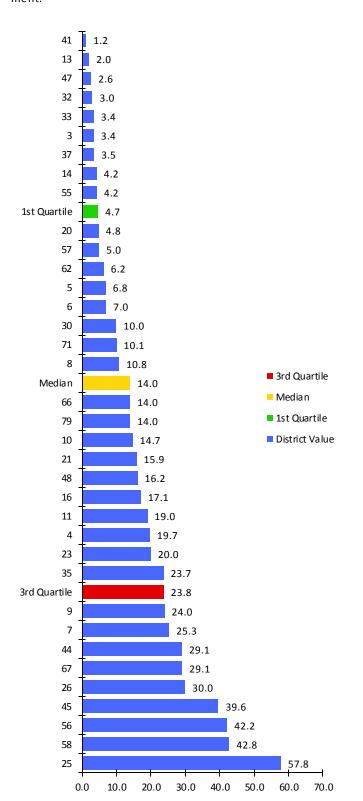


Figure 5
Invoices Processed per FTE per Month

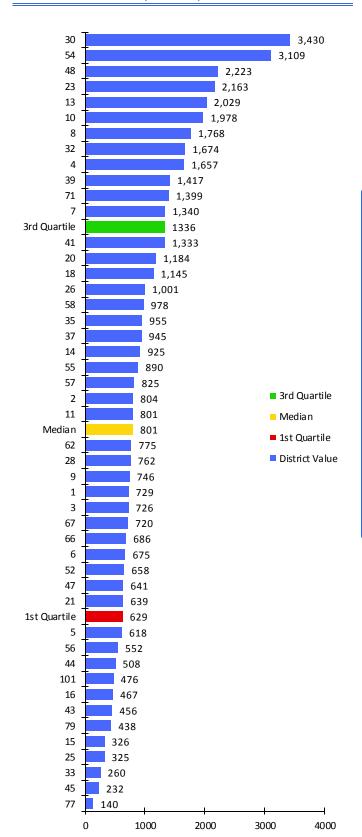
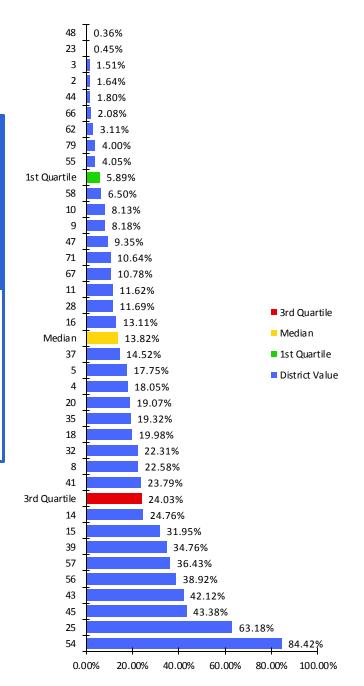


Figure 6
Invoices Past Due at Time of Payment

Payments are often held until the due date (often net 30 days). One reason for doing this is to sustain positive cash flow. However, payments that are made after their due date can result in fees and/or harm the district's reputation.

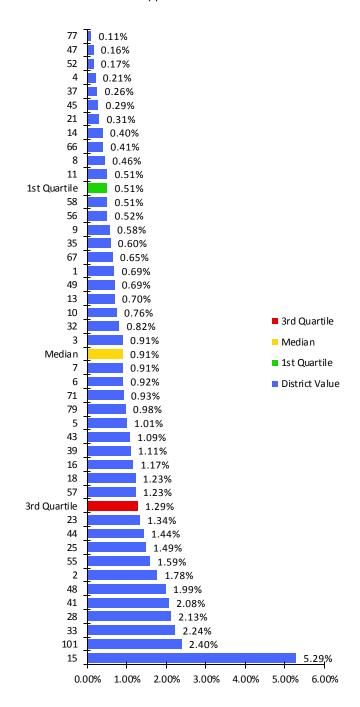


How many percentage points would you need to improve in order to move to the next highest quartile? To move into the Top 5?

How many more invoices would need to be paid on-time in order to gain that many percentage points?

Figure 7
Payments Voided

This can be used to identify your void rate.



What does your Accounts Payable department need to work on?

Which KPIs will track progress towards your improvement goals? Who is responsible for reporting on this?

Whose buy-in and support is needed to support these goals (e.g., CFO, Assistant Superintendent, CIO/CTO)?

Finance Page 8

KPI DEFINITIONS

AP Cost per \$100K Revenue

Importance This measures the operational efficiency of an Accounts Pavable Department.

Factors that Influence

- Administrative policies and procedures
- Administrative organizational structure
- Administrative leadership style, decision-making process and distribution of organizational authority
- Departmental and individual employee responsibilities and competencies
- Performance management systems
- Monitoring and reporting systems
- Number of FTEs in the Accounts Payable Department
- The total dollar a mount of invoices paid a nnually
- Level of automation
- Regional salary differentials and different processing approaches

Calculation

Total AP department personnel costs *plus* AP department non-personnel costs *divided by* total district operating revenue over \$100,000.

AP Cost per Invoice

Importance This measure determines the average cost to process an invoice. According to the Institute of Management, the cost to handle an invoice is the second most used metric in benchmarking AP operations.

Factors that Influence

- Administrative policies and procedures
- Administrative organizational structure
- Administrative leadership style, decision-making process and distribution of organizational authority
- Departmental and individual employee responsibilities and competencies
- Performance management systems
- Monitoring and reporting systems
- Number of FTEs in the Accounts Payable Department
- The total dollar a mount of invoices paid a nnually
- Level of Automation
- Regional salary differentials and different processing approaches

Calculation Total AP department personnel costs *plus* AP department non-personnel costs *divided by* total number of invoices handled by the AP department.

Invoices - Days to Process

Importance This measures the efficiency of the payment process. **Factors that Influence**

- Automation
- Size of district
- Administrative policies

Calculation Aggregate number of days to process all AP invoices, from date of invoice receipt by the AP department to the date of payment post/check release *divided by* the total number of invoices handled by the AP department.

Invoices Processed per FTE per Month

Importance This measure is a major driver of accounts payable department costs. Lower processing rates may result from handling vendor invoices for small quantities of non-repetitive purchases; higher processing rates may result from increased technology using online purchasing and invoice systems to purchase and pay for large quantities of items from vendors.

Factors that Influence

- Administrative organizational structure
- Administrative leadership style, decision-making process and distribution of organizational authority
- Departmental and individual employee responsibilities and competencies
- Performance management systems
- Monitoring and reporting systems
- Number of FTEs in the Accounts Payable Department
- The number of invoices paid annually
- Level of automation

Calculation Total number of invoices handled by the AP department *divided by* total number of AP staff (FTEs), *divided by* 12 months.

Invoices Past Due at Time of Payment

Importance Minimizing the number of payments that are past due should be a mission of the accounts payable department.

Factors that Influence

- Process controls
- Department workload management
- Overtime policy

Calculation Number of invoices past due at time of payment *divided by* total number of invoices handled by the AP department.

Payments Voided

Importance This measure reflects processing efficiencies and the degree of accuracy. A high percentage of duplicate payments may indicate a lack of controls, or indicate that the master vendor files need cleaning.

Factors that Influence

- Administrative policies and procedures
- Administrative organizational structure
- Administrative leadership style, decision-making process and distribution of organizational authority
- Departmental and individual employee responsibilities and competencies
- Performance management systems
- Monitoring and reporting systems
- Number of FTEs in the Accounts Payable Department
- The total number of checks written annually
- Level of automation

Calculation Number of payments voided *divided by* total number of AP transactions (payments).

SUPERINTENDENT SURVEY REPORT





Summer 2014

Urban School Superintendents: Characteristics, Tenure, and Salary Eighth Survey and Report

Urban school superintendents hold one of the most important and challenging jobs in America's education system. In this era of accountability and standards, superintendents are charged with making visible and rapid improvements in the academic achievement of the nation's most vulnerable children. They must break down barriers to reform and build capacity for quality teaching and learning in their schools. They must unite parents, educators, school boards, and business and community leaders behind a clear and coherent vision of instructional purpose. Amidst the highly politicized environments of big city school districts, superintendents must serve as collaborators, visionaries, good communicators, and agents of change.

Given this backdrop, the Council of the Great City Schools (CGCS) prepared this report to improve public understanding of employment patterns and demographic trends among the nation's urban superintendents. The organization has been surveying its member districts since 1997. This, the Council's eighth report on urban superintendents, presents the results of the 2014 survey.

CGCS represents the nation's largest urban school districts. Though there are approximately 17,000 school districts in the country, the Council's 66 districts serve approximately 6.9 million of America's 49.2 million K-12 students (14%), and twenty to forty percent of the nation's low-income students (20%), students of color (25%), and English language learners (40%).

METHODOLOGY

The Council of the Great City Schools surveyed its member districts in the winter of 2014 to determine the characteristics of big city school superintendents for the 2013-2014 school year. This report presents the results of that survey. Surveys were sent to superintendents and their assistants using an online survey tool. The surveys were sent out in January 2014 with reminders by email and phone in February, March and April. Respondents were asked to provide information on the gender, race/ethnicity, salary, benefits, bonuses, and previous work experience of their district's superintendent.

Surveys were received from **53 of the 66 CGCS member districts (80 percent)**, and all responses were included in this analysis. All data presented in this publication are reported in summary form.

The data presented in this survey have a number of important limitations. No tests of statistical significance were conducted on changes over time, nor are standard errors of measurement included in this report. We relied solely on the information reported by the districts themselves. Furthermore, the survey sample consists only of districts that submitted responses, and is largely the same but not identical to samples in past reports.

HIGHLIGHTS

Demographics1

- As of 2014, approximately 45 percent of superintendents from CGCS member districts identified themselves as White, 42 percent as Black, and 9 percent as Hispanic. These results represent slightly more diversity compared to 2003, when 56 percent of CGCS superintendents identified themselves as White, 33 percent as Black, and 10 percent as Hispanic. (Figure 1)
- As of 2014, approximately 70 percent of CGCS superintendents were men. Thirty-two percent of CGCS superintendents were White males, 28 percent were Black males, 8 percent were Hispanic males, and 2 percent were Asian males. (Figures 1)
- As of 2014, approximately 28 percent of CGCS superintendents were women. Thirteen percent of CGCS superintendents were Black females, 13 percent were White females, and 2 percent were Hispanic females. (Figure 1)

Tenure

- The average tenure of current CGCS superintendents increased from 2.8 years in 2003 to 3.18 years in 2014.² (Figure 2)
- Twenty-one percent of CGCS superintendents in 2014 have been in office for five or more years, up from 15 percent in 2003. (Figure 3)
- Fifty-seven percent of CGCS superintendents in 2014 have been in office between one and five years, up from 54 percent in 2003. (Figure 3)
- Twenty-three percent of CGCS superintendents in 2014 have been in office for less than a year, down from 31 percent in 2003. (Figure 3)
- The average tenure of the immediate past CGCS superintendents was 4.5 years in 2014.

Previous Work Experience

• In 2014, most CGCS superintendents – 92 percent – worked in the K-12 education sector prior to their appointment as superintendent. (Figure 4)

Accountability

• Ninety-two percent of CGCS superintendents are accountable to their school boards. Four percent are accountable to the mayor and another four percent have other forms of accountability. (Figure 5)

¹ Calculations may not sum to 100 due to rounding

² Tenure is defined as the length of time the current superintendent has been in office as of May 1, 2014.

Salaries

- Average CGCS superintendent salaries have increased from roughly \$189,000 in 2003 to approximately \$242,000 in 2014. Accounting for twenty-seven percent inflation since 2003 (\$189,000 in 2014 dollars), average CGCS superintendent salaries have increased by less than one percent from \$240,000 in 2003 to \$242,000 in 2014. (Figure 6)
- Salaries in 2014 for CGCS superintendents ranged from \$99,000 to \$339,000. The majority (54 percent) of CGCS superintendents earned \$250,000 or more per year in 2014. The distribution of superintendent salaries since 2003³ is displayed in Figure 7.
- CGCS superintendent salaries appear to vary somewhat by tenure. In 2014, the average salary for a CGCS superintendent with five or more years experience was approximately \$255,000, the average salary for those with between one and five years of experience was approximately \$246,000, and the average salary of those superintendents with one year or less experience was about \$223,000.4 (Figure 8)
- Average CGCS superintendent salaries also appear to vary according to the size of the district. The average salary for a CGCS superintendent with fewer than 50,000 students was \$211,000. In a district with between 50,000 and 100,000 students, the average salary was \$260,000. In a district with between 100,000 and 200,000 students the average salary is \$276,000. And in a district with 200,000 or more students the average salary was \$281,000. Figure 9 reports 2014 average CGCS superintendent salary by student enrollment.
- In 2014, female superintendents in large districts (100,000 or more students) had an average tenure of 3.5 years and an average salary of approximately \$265,000 while their male counterparts in large districts had an average tenure of 2.47 years and salary of \$284,000. In smaller districts (less than 100,000), female superintendents had an average tenure of 3.8 years and salary of approximately \$203,000 while male superintendents in smaller districts had an average tenure of 3.1 and a salary of approximately \$241,000. (Table 1)
- Average tenure for Black superintendents in large districts was 1.08 years with an average salary of \$275,000 in 2014. White superintendents in large districts had an average tenure of 3.01 years with an average salary of \$271,000. In the smaller districts, Black superintendents had an average tenure of 2.85 years and an average salary of \$231,000 while White superintendents in smaller districts had an average tenure of 4.16 years with an average salary of \$228,000. (Table 1)
- According to the data available, the average CGCS superintendent salary in 2014 was slightly higher than that of their counterparts nationwide. In 2013-2014, the average salary across all district superintendents with 25,000 students or more was approximately \$202,000 while the CGCS average was approximately \$242,000. (Figure 10)⁵

Benefits and Bonuses

- About twenty-six percent of responding superintendents reported receiving financial bonuses or pay-for-performance provisions. Where benefits were reported, the amount of the annual bonus or pay-for-performance provision in 2010 ranged from approximately \$2,000 to \$200,000.
- Forty-five percent of CGCS superintendents reported having access to a car or receiving a car allowance, 86 percent reported having an IRA/403b or other retirement account, and four percent reported receiving a housing allowance in 2014.

³ Previous salaries (2003- 2010) in this Figure have not been adjusted for inflation.

⁴ Previous salaries (2003- 2010) in this Figure have not been adjusted for inflation.

⁵ AASA, 2014.

• The average benefits package for CGCS superintendents was valued at approximately \$153,223 in 2014.

DISCUSSION

Several patterns, trends and relationships relating to employment and demographics have emerged through the course of this analysis.

The demographics of urban superintendents have become more diverse over time. Currently, Black and Hispanic superintendents represent a little over half of the CGCS superintendents where they were only 43 percent of the superintendent demographic in 2003. Also in 2003, there were no Hispanic women superintendents, currently they account for two percent of the CCGS superintendents.

According to the data, CGCS superintendents are staying in their districts for longer periods of time. The tenure of current CGCS superintendents has gradually increased over time, from 2.8 years in 2003 to an average of 3.18 years in 2014, although there was a dip compared to 2010. Moreover, the average tenure of the immediate past CGCS superintendents was 4.5 years in 2014.

Additionally, the average CGCS superintendent salary in 2013-2014 was similar to that of their counterparts nationwide. In 2013-2014, the average salary across district superintendents with 25,000 students or more was \$201,573 while the CGCS average was approximately \$242,000 for that same year. CGCS superintendents tend to serve in districts with considerably more students.

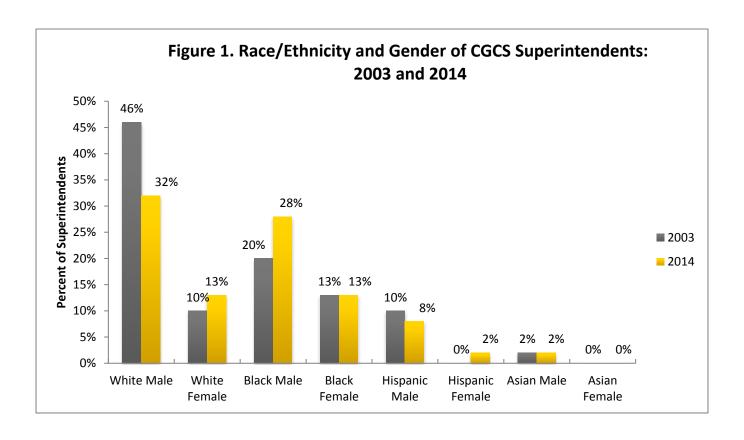
While superintendent salary does not have a simple relationship with tenure, there does appear to be a relationship between superintendent salary and district enrollment. In short, superintendents in larger districts tend to earn more money, suggesting that the financial compensation for big-city superintendents varies according to the magnitude of the job itself.

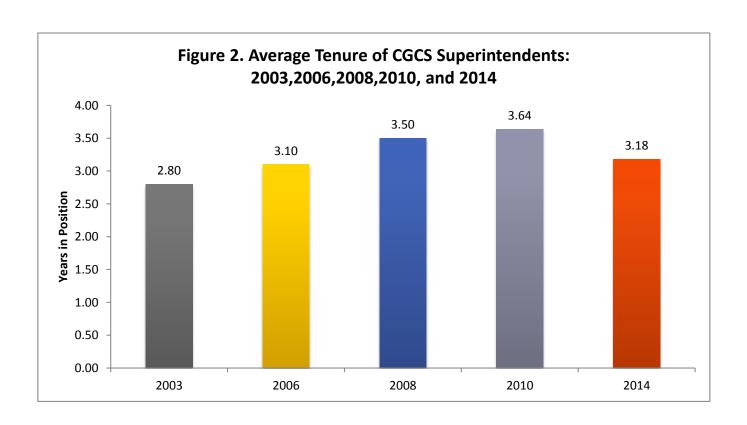
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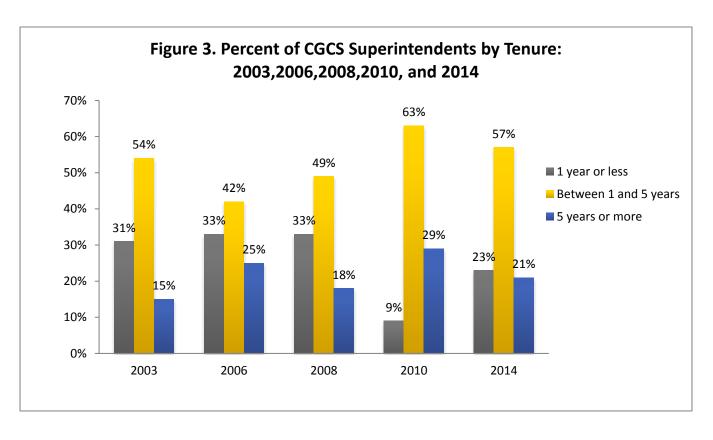
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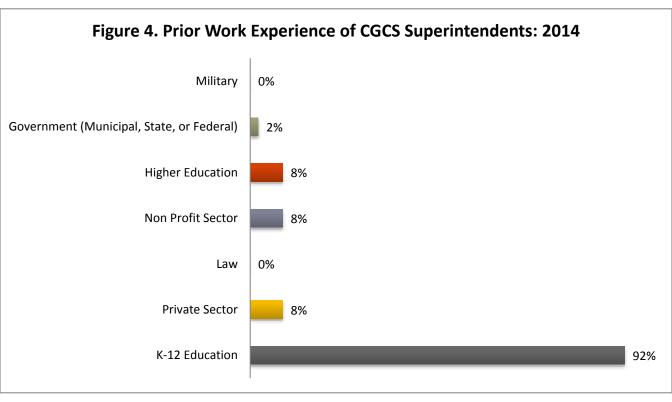
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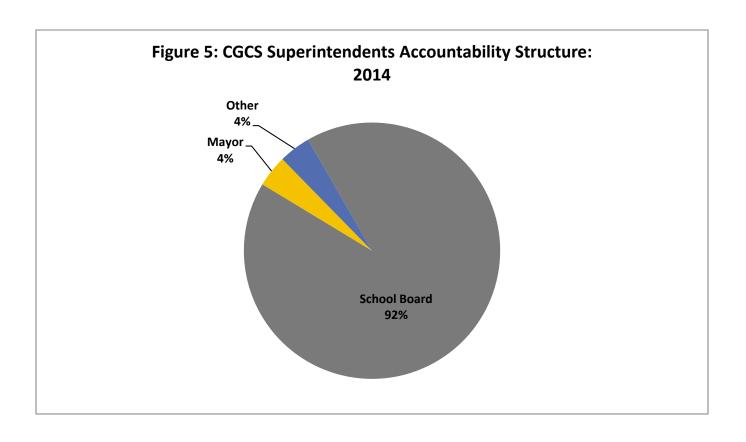
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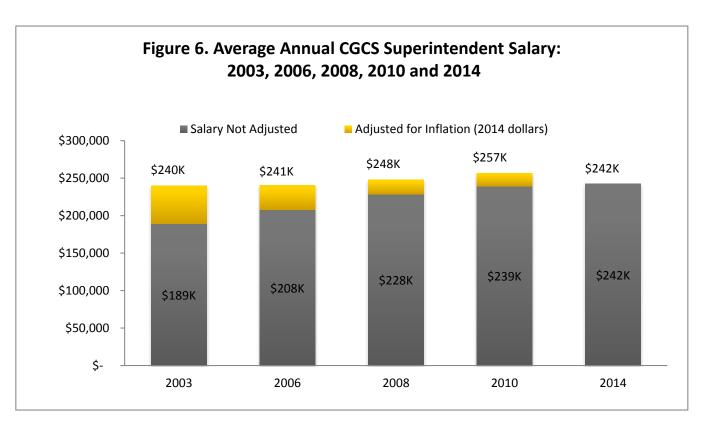


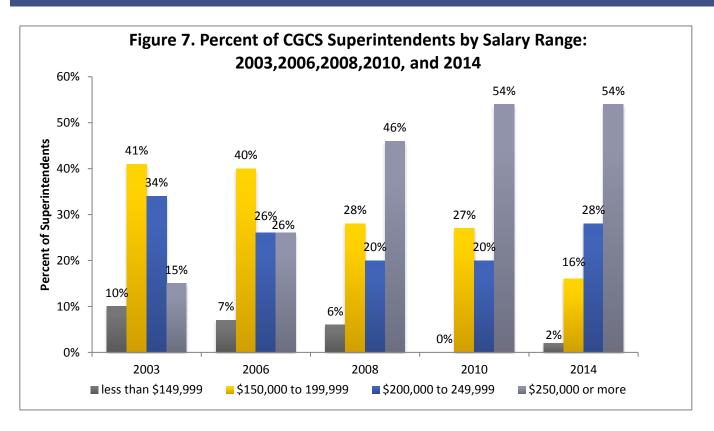


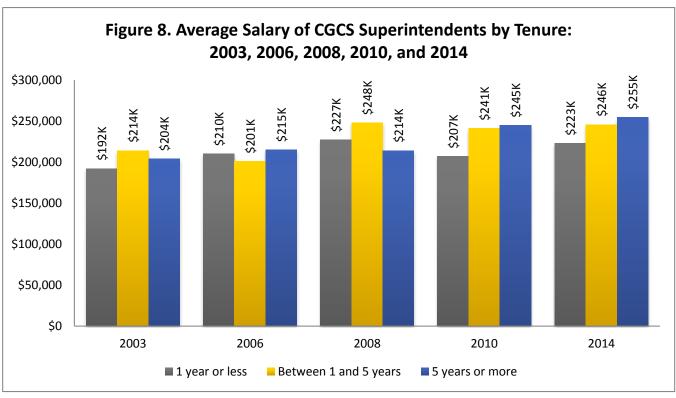












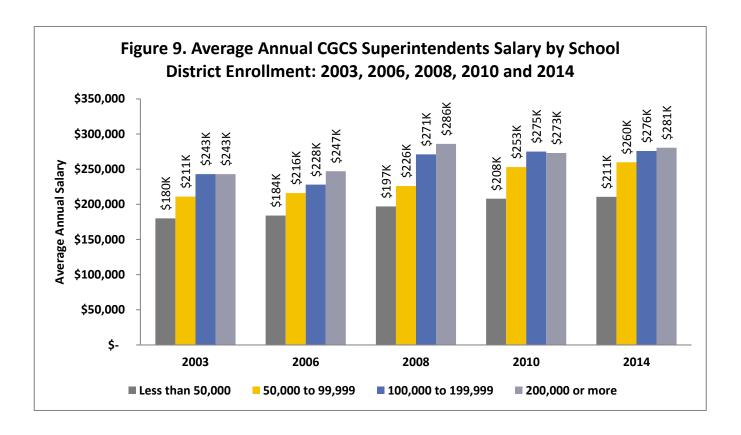


Table 1. Average Salary and Tenure by Race, Gender and District Size

	Average Salary		Average Tenure
Large	\$	277,765	2.81
Female	\$	264,670	3.5
Male	\$	284,313	2.47
Small	\$	231,359	3.29
Female	\$	203,496	3.80
Male	\$	241,310	3.1
Large	\$	277,765	2.81
African-American/Black	\$	275,000	1.08
Other	\$	300,000	1.83
Hispanic	\$	315,000	5.67
White	\$	271,023	3.01
Small	\$	231,359	3.29
African-American/Black	\$	231,489	2.85
Asian-American/Pacific	\$	250,000	0.92
Hispanic	\$	239,707	2.56
White	\$	227,735	4.16
Grand Total	\$	242,497	3.18

Surveys were received from the following districts:

Albuquerque Public Schools

Anchorage School District

Atlanta Public Schools

Austin Independent School District

Birmingham City Schools

Boston Public Schools

Bridgeport Public Schools

Charleston County School District

Charlotte-Mecklenburg Schools

Chicago Public Schools

Cincinnati Public Schools

Clark County School District

Cleveland Metropolitan School District

Columbus City Schools

Dallas Independent School District

Dayton Public Schools

Des Moines Independent Community School District

Denver Public Schools

Detroit Public Schools

District of Columbia Public Schools

Duval County Public Schools

East Baton Rouge Parish School System

Fort Worth Independent School District

Fresno Unified School District

Guilford County Schools

Hillsborough County Public Schools

Houston Independent School District

Indianapolis Public Schools

Jackson Public Schools

Jefferson County Public Schools

Kansas City Public Schools

Little Rock School District

Long Beach Unified School District

Metropolitan Nashville Public Schools

Miami-Dade County Public Schools

Milwaukee Public Schools

Minneapolis Public Schools

Norfolk Public Schools

Oakland Unified School District

Omaha Public Schools

Pittsburgh Public Schools

Providence Public School District

Richmond Public Schools

Rochester City School District

San Diego Unified School District

San Francisco Unified School District

Seattle Public Schools

St. Louis Public Schools

St. Paul Public Schools

The School District of Palm Beach County

The School District of Philadelphia

Toledo Public Schools

Wichita Public Schools

BOSTON FOOD SERVICES REPORT



Review of the Food and Nutrition Services Department of the Boston Public Schools

April 2014

Samuel DePina, Chief Operating Officer for Student Support in the Boston Public Schools (BPS), requested that the Council of the Great City Schools (CGCS) provide a high-level management review of the school district's Food and Nutrition Services Department. Specifically, he requested that the Council¹—

- Review and evaluate the leadership and management, organization, and operations of the school district's Food and Nutrition Services Department
- Develop recommendations that would help the district's food service operations achieve greater operational efficiency, effectiveness, and sustainability.

In response to this request, the Council assembled a Strategic Support Team (the team) of senior managers with extensive experience in food service operations from other major city school systems across the country. The team was composed of the following individuals. (Attachment A provides brief resumes of team members.)

Project Staff

Robert Carlson, Project Director Director, Management Services Council of the Great City Schools

David Koch, Principal Investigator Chief Administrative Officer (Retired) Los Angeles Unified School District

Shirley Brooke, Director of Food & Nutrition Services (retired) Jefferson County (Colorado) Public Schools

Michael Eugene, Chief Operating Officer, Orange County (Florida) Public Schools

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¹ The Council has conducted some 250 instructional, management, and operational reviews in over 50 big-city school districts over the last several years. The reports generated by these reviews have often been the foundation for improving the operations, organization, instruction, and management of many urban school systems nationally. These reports have also been the basis for identifying "best practices" for other urban school systems to replicate. (Attachment E lists the reviews that the Council has conducted over the last 15 years.)

Theresa Hafner, Executive Director, Enterprise Management Denver Public Schools

Helen Phillips, Senior Director, School Nutrition Norfolk Public Schools

The team conducted fieldwork for the project during a four-day site visit to Boston on November 19-22, 2013.² The general schedule for the site visit is outlined below. (The complete working agenda for the site visit is presented in Appendix B.³)

The team met with the Superintendent, the Deputy Superintendent of Operations, and the Chief Operating Officer on the first day of the site visit to better understand their expectations and objectives for the review. The team used the next two days of the site visit to conduct interviews with key staff members, examine documents and data, and conduct site visits. (The complete lists of individuals interviewed, sites visited, and materials reviewed are presented in Appendices C⁴ and D.⁵) The final day of the visit was devoted to synthesizing and refining the team's findings and recommendations, and to providing the Deputy Superintendent of Operations and the Chief Operating Officer with a briefing on the team's preliminary findings.

The Council sent the draft of this document to team members for their review in order to affirm the accuracy of the report and to obtain their concurrence with the final recommendations. This management letter contains the findings and recommendations that have been designed by the team to help improve the operational efficiency, effectiveness, and sustainability of the BPS food-service program.

The Boston Public Schools

The Boston Public Schools is the largest public school system in Massachusetts and the 73rd largest in the United States. The district operates 127 schools with over 57,000 students supported by over 8,000 employees. The General Fund operating budget for fiscal year 2013-14 was approximately \$934 million.

The Boston School Committee is the governing body of the Boston Public Schools. The mayoral-appointed School Committee is responsible for defining the vision, mission, and goals of the Boston Public Schools; establishing and monitoring

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² The team was originally scheduled to conduct its review in October 2013, but was requested to reschedule to November because of a conflict with the Food and Nutrition Services Department Director's calendar. This change required reconstituting portions of the review team.

³ Multiple and last-minute modifications to the agenda by the Food and Nutrition Services Department Director without the knowledge or consent of the team were disruptive to the review process. In addition, Cafeteria Managers and Satellite Leads were not notified of their meetings with the CGCS team until the day before.

⁴ While the Food and Nutrition Services Department sent the team a large volume of documents and other information, their value was significantly diminished by their late receipt.

⁵ The Council's reports are based on interviews with district staff and others, a review of documents, observations of operations, and professional judgment. The team conducting the interviews must rely on the willingness of those interviewed to be truthful and forthcoming, but cannot always judge the accuracy of statements made by interviewees.

the annual operating budget; hiring, managing and evaluating the superintendent; and setting and reviewing district policies and practices to support student achievement.

The stated mission of the BPS is: "As the birthplace of public education in this nation, the Boston Public Schools is committed to transforming the lives of all children through exemplary teaching in a world-class system of innovative, welcoming schools. We partner with the community, families, and students to develop in every learner the knowledge, skill, and character to excel in college, career, and life."

The Superintendent of Schools is responsible to the School Committee for the effective operations of the school system, including implementation of the district's strategic plan and the efficient management of the district's resources.

Food and Nutrition Services Department

The Food and Nutrition Services Department (FNSD) provides child nutrition programs, including both breakfast and lunch, at all school sites of the Boston Public Schools. The FNSD food service delivery model includes both preparation sites and satellite locations that receive prepared meals from an outside contractor. The district also has a hybrid, central food warehouse and distribution facility.

Seventy-eight percent of BPS students are eligible for the Free and Reduced Price Meals program. This year, however, BPS is participating in the Community Eligibility Provision (CEP), which allows for more flexibility in administering the program. Through this federal program, breakfasts and lunches are available to all students in all schools at no cost, regardless of family income. Previously, families had to fill out and return forms to qualify for the meals program. By entering into the CEP, the Boston school district can waive all meal charges for all students. Parents do not need to take any action to participate in the program.

The FNSD is headed by a Director with three direct reports and two staff positions, as shown in the abbreviated organizational chart in Exhibit 1 below. The three direct line positions include the Assistant Director of Operations, with management responsibilities for all school-site food service operations through a staff of six Field Coordinators; an Assistant Director of the Central Kitchen Facility;⁶; and a Deputy Director of Finance and Information Technology, whose staff include the Purchasing Manager, the Financial Planning & Analysis manager, and a Computer Specialist. One Staff Assistant supervises the Shared Support Services group, which includes payroll, equipment, accounts payable/accounts-receivable clerks along with a computer repair technician. The other staff position is responsible for special projects.

⁶ The FNSD Central Kitchen Facility was actually closed in 2005 and only a skeletal warehousing operation remains.

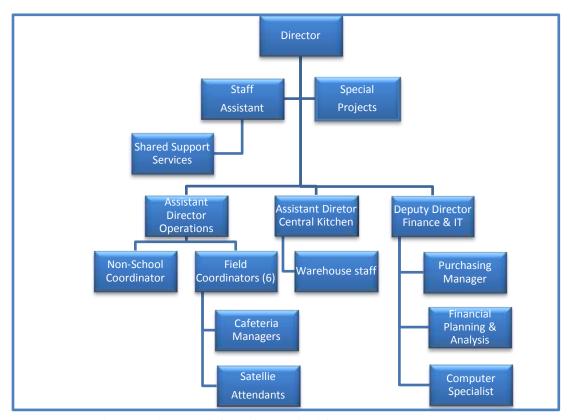


Exhibit 1. Food and Nutrition Services Organization Chart

Source: Prepared by CGCS based on information obtained from BPS.

The BPS appears to have been extraordinarily tolerant of financial losses incurred by the food service program over the past several years. Exhibit 2 shows the FNSD total revenue, program loss, and loss as a percentage of total revenue for the past eight years. The loss per year averages over 10 percent during this period and the cumulative loss during this period amounts to over \$21 million. These losses represent a substantial encroachment on the general fund.

Exhibit 2. FNSD Revenues, Losses, and Losses as a Percentage of Revenues for the School Years 2006-07 to 2013-14 (Projected)⁷

School	Total	Net	Loss as
Year	Revenue	Loss	Percentage of
	\$ millions	\$ millions	Revenue
2006-07	\$23.1	\$1.7	7.4%
2007-08	22.8	3.7	16.2
2008-09	23.9	3.5	15.3
2009-10	25.9	1.4	5.4

⁷ While this information was provided by the Office of the Chief Financial Officer and is presumed to be accurate, the team received differing and conflicting financial information from the district and the department.

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2010-11	26.0	2.0	7.6
2011-12	28.9	1.7	5.9
2012-13	29.1	3.6	12.4
2013-14 (Projected)	31.9	3.5	11.0

Source: Prepared by CGCS from information provided by BPS

Findings and Observations

The findings and observations of the Council's Strategic Support Team are organized into four general areas: Commendations, Leadership and Management, Organization, and Operations.

Commendations

 The team noted that many of the FNSD staff appeared to be hard-working, competent, dedicated to the service of students, and eager to embrace new ideas for improving their systems and processes.

Leadership and Management

- The school district's tolerance of the financial losses incurred by the food service program over the past several years (see Exhibit 2 above) may reflect a lack of organizational will to address the underlying structural issues within the program.
- The FNSD has created what appears to be a hostile work environment. For example
 - Departmental morale was extraordinarily low at virtually all levels and many managers and employees feel isolated, unappreciated, and disrespected.
 - o The department's leadership style was described as "management by intimidation."
 - o Several employees became extremely emotional during the team's interviews (which they attributed to job stress); others refused to speak to the team, apparently out of fear of reprisal.
 - The alleged public disciplining of employees appeared to be aimed at embarrassing them rather than changing behavior.
 - The team was told of mid-level managers being reprimanded for initiating actions clearly within their areas of responsibility.
 - Some Cafeteria Managers told the team that they have been threatened with reprimands for asking too many questions.

- The department suffers from poor communications at all levels. For example
 - o There is a lack of regularly scheduled meetings at all levels.
 - Meetings that are held lack agendas and are not designed to identify and resolve issues.
 - o It was reported that phone call and e-mail inquiries from school-site employees to the central FNSD office often are not answered.
 - Many employees were unaware of the functions and processes of other units in the department.
 - School site Cafeteria Managers complained that their biggest issue was lack of communications.
 - o Cafeteria Managers do not consider themselves part of the management team
 - o Menu changes are not always communicated in advance.
 - The team heard multiple reports of the failure to report information to the central office because fax machines being out of toner.
- The department has no strategic business plan with stated goals, objectives, tasks, timelines, costs and accountabilities. To illustrate
 - While the Director advised the team that he had engaged a consultant to develop a business plan for the department, the engagement letter from the firm did not reflect development of a plan in its deliverables.
 - On the final day of interviews, after multiple requests by the team, the Director presented the team with a document that he represented to be his business plan. This document clearly demonstrated his lack of understanding of the concepts, elements, and mechanics of a departmental business plan. To Illustrate, this plan is displayed in its entirety on the next page as Exhibit 3.
- There is no capital plan for the FNSD which, if based on a comprehensive facilities assessment or Facilities Condition Index, would outline the food service plant and equipment requirements--both current and future.
- The department has no marketing plan to promote participation in the food service program.
- The department has no ongoing process-improvement program to encourage innovation and efficiency.

Exhibit 3, FNSD's "Strategic Business Plan"

One-Year Plan:

Establish a strong baseline operation for participation in Community Eligibility Option (CEO) throughout the approval period of CEO.

Prepare for new Administrative Review (Healthy Hunger Free Kids Act 2010 incorporating May 2013 6-Cent Certification Validation anticipating January 2014 Department of Elementary and Secondary Education visit.

Prepare new RFP for vended meals to be advertised, followed by review of technical proposals, recommendation of successful technical proposal to review price proposal. Final recommendation to interim Superintendent followed by final recommendation to Mayor Elect.

Review, develop and implement department processes and procedures to achieve departmental standardization. Develop team and celebrate achievements and successes.

Three-Year Plan:

Stay on course; assist other districts with challenges, successes, and anomalies with CEO, as a respected district.

Ensure accurate, meaningful data and data integrity to benchmark strengths and weakness for ongoing course action.

Source: Reproduced from the document presented by the FNSD Director.

- The department does not measure customer satisfaction or actively seek student input into menu planning.
- An over-reliance on outside management consultants may reflect departmental leadership's inability to identify and resolve FNSD issues.
- The FNSD management is not data-driven; and business analytics and performance metrics are not used to manage the operation or to guide decisionmaking. For example –
 - Field Supervisors do not use financial, meal count, participation, or other operational data from current systems or reports to examine the performance of school cafeterias.
 - There are no school-level profit and loss financial statements.
 - Staffing formulas for school cafeterias are loosely based on ranges. To illustrate –
 - Preparation sites are staffed based on meals-per-hour ranging from 18 to 24.

- Pre-plated sites are staffed based on meals-per-labor-hour of 30 to 50.
- Extenuating circumstances leading to higher staffing levels are not documented or quantified.
- Decisions are made without the involvement of or input from stakeholders. To illustrate --
 - The Community Eligibility Provision initiative was implemented without fully considering the program's requirements, such as the scalability of existing infrastructure and staffing.
 - Management was described as "top down" and "my way or the highway."
 - The team saw no evidence of teamwork or collaborative planning or problem solving.
- The FNSD management has failed to adequately address audit exceptions identified in the most recent (2011) Coordinated Review Effort (CRE),⁸ and the department has not adequately prepared for an upcoming 2014 review.
- Internal controls within FNSD are generally weak or non-existent. To illustrate-
 - There are no profit and loss statements at the school level.
 - o The oversight of the pre-plated meal program is inadequate. For example
 - No single district person or position is accountable for the supervision of the contractor.
 - The district does not attempt to reconcile the meals delivered and served with the meals billed by the contractor.
 - Food shipments to preparation sites are not reconciled to menus and meal counts.
 - Schools order some items directly from vendors without district oversight (e.g., milk purchases).
 - o Product substitutions are not controlled for quality or cost.
 - o Payroll is based on "anticipated" time and there is frequently no evidence of review and approval by supervisors of time sheets.

⁸ A Coordinated Review Effort (CRE) is a standardized review process developed by the United States Department of Agriculture that includes a comprehensive on-site evaluation of a school food authority's participation in the National School Lunch Program and the School Breakfast Program.

- o It was reported to the team that cash receipts at schools go uncollected for up to a full year.
- It was unclear whether all direct and indirect costs associated with the food program are charged back appropriately to the FNSD.⁹
- Cafeteria Managers, Satellite Leads, and school-based food-service workers are in the same collective bargaining unit, resulting in an inability to establish effective supervisory relationships among these classes of employees.
- There is a general lack of training and staff development throughout the organization and the training conducted by the Director appeared to be "ad hoc" and poorly planned.
- The Special Projects unit pursues grant funding initiatives without an overall plan or departmental direction, which may result in ongoing cost implications for the district and can distract from the FNSD's primary focus.

Organization

- The FNSD does not have people with the appropriate skill sets, backgrounds, and training in several key management positions.
- The FNSD organization chart presented to the team emphasizes support functions under the Deputy Director, Finance and IT, while it understates the importance of the core positions in the Operations arm of the organization (e.g., Field Supervisors, Cafeteria Managers, and Satellite Leads).
- The team noted several reporting relationships that were less than optimal. For example
 - The Equipment Coordinator, who is responsible of the maintenance of all school cafeteria equipment, reports to the Purchasing Manager rather than the Assistant Director of Operations.
 - Menu planning, a function integral to cost control and quality assurance, reports to the Purchasing Manager, understating its importance to the enterprise.
- Job responsibilities are not clearly defined. For example -
 - o Field Supervisors view their responsibilities broadly as encompassing operations, finance, marketing, and technology while their manager views

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⁹ The Team was advised that certain costs are distributed to the food service program according to a study-based formula established a number of years ago. Nonetheless, the Team noted charges to the program that were apparently not allocated in accordance with the formula.

- their duties as primarily related to personnel functions, such as school-level staff assignments and discipline.
- o The Shared Support Services group of clerical staff appears to have redundant responsibilities with school-level staff in several areas, including work orders, purchasing, and payroll activities.

Operations

- Many systems are paper-driven and personnel-intensive. For example
 - Payroll data in the form of sign-in sheets (that used to be keyed into the system from school sites) are now faxed to the FNSD central office where it is entered into the system by hand.
 - o Most vendor invoices are paid using paper-based voucher packages rather than the district's ERP system.
 - o Access to district ERP systems is reported to be slow and cumbersome.
 - Some staff reported significant delays in gaining security access to the ERP system in order to perform their duties.
- It was reported to the team that the FNSD has failed to take advantage of its full allotment of USDA commodities.
- Competitive sales from student stores, vending machines, and bake sales are reportedly not being controlled.
- The department has no formal system for the evaluation of vendors.
- Pre-plated meals are perceived to be of lower quality, have less variety, and contain too many cold components.
- The team had the following observations about the district's menu planning
 - o School Cafeteria Managers have little input into the menu-planning process.
 - o Menus are apparently planned without regard to labor costs.
 - The department does not perform pre and post costing out of menus.
 - o Products called for in menus reportedly are frequently unavailable.
- The central warehouse and distribution center (formerly the Central Kitchen Facility) is inefficient due to its layout and the age and condition of equipment.

- FNSD does not have a well-designed allergen program leaving students vulnerable and Point of Sale (POS) terminals are not being used to alert cashiers to student allergies and special dietary requirements.
- It was reported that earned pay-rate increases are not implemented on a timely basis and that bids are not conducted for open positions (as provided for in labor agreements).
- The team saw no evidence that there is a preventive maintenance program for cafeteria equipment.

Recommendations

- 1. Address the underlying structural issues in the food service operation, which have resulted in years of ongoing financial losses in the program. For example
 - a. Adopt and implement labor standards based on a fixed "actual meals-per-labor-hour formula" and require documentation of any extenuating circumstances that may lead to a formula exception.
 - b. Better control food costs through a stronger menu-planning process.
 - c. Enhance internal controls over operations, including greater oversight of contractors and suppliers, improved review and approval of payroll time and attendance, and more timely collections of cash receipts.
 - d. Eliminate overlapping and redundant duties between field and central clerical staff.
 - e. Make greater use of technology available through the district's ERP, the department's Point-Of-Sale system, and "back of the house" systems.
 - f. Fully utilize federal commodities to reduce food costs.
 - g. Enforce federal rules and regulations relating to competitive food sales.
 - h. Close the district's central food service supplies warehouse operation.
- 2. Investigate the conditions that may be creating a hostile work environment in the FNSD and take appropriate actions to address the issues.
- 3. Evaluate management personnel in the department to ensure that people with the applicable background, experience, training, and skill sets are in the appropriate positions.
- 4. Reconfigure the department's organization to reflect the core importance of Operations and assign key operational support positions, such as the Equipment Coordinator and the Menu Planner, to the Assistant Director of Operations.

- 5. Create a strategic business plan with stated goals, objectives, Key Performance Indicators (KPIs), tasks, timelines, costs and personnel accountabilities.
- 6. Develop a capital plan based on a comprehensive facilities assessment that outlines the FNSD's plant and equipment requirements.
- 7. Develop a focus on meal quality and appeal as the core value of the department and the central means for attracting and retaining customers.
- 8. Establish a marketing plan to promote participation in the food service program.
- 9. Institute an on-going process improvement program to encourage innovation and efficiency.
- 10. Develop an ongoing comprehensive and coordinated staff development and training program for departmental employees at all levels.
- 11. Transform the FNSD into a data-driven organization by instituting business analytics and performance metrics using core-enterprise information, such as
 - a. School-level profit and loss statements
 - b. Comparative participation data
 - c. Documented formula-driven staffing levels.
- 12. Establish a collaborative model for decision-making within the FNSD organization.
- 13. Improve internal communications through regular, well-planned, and interactive staff meetings at all levels.
- 14. Measure customer satisfaction and actively seek student input into menu planning on a regular basis.
- 15. Address audit exceptions identified in the most recent CRE review in preparation for the upcoming 2014 review.
- 16. Review direct and indirect costs to ensure the food-services program is being charged appropriately.
- 17. Take steps to ensure employees and their supervisors are not in the same collective bargaining unit.
- 18. Limit the pursuit of grant-funded initiatives to those that are consistent with the department's business plan and are supportive of the food service program's objectives.

- 19. Clearly define the job responsibilities of the Field Supervisors so they encompass an enterprise-wide view of operations, including finance, marketing, technology, and personnel management.
- 20. Implement a systematic method for the evaluation of vendors, contractors, and suppliers. Ensure that contracts have accountability clauses.
- 21. Establish standards for menu planning that incorporate quality, nutritional, time, labor, equipment, and cost parameters.
- 22. Establish an allergen program that contains processes to easily identify students with special dietary requirements.
- 23. Institute procedures to ensure compliance with collective bargaining agreements relating to placement on pay-rate schedules and job-opening bids.
- 24. Establish a preventive maintenance program for food service equipment.
- 25. Establish a plan to boost production to meet the anticipated increased demand generated by the CEP program.

ATTACHMENT A. STRATEGIC SUPPORT TEAM

Robert Carlson

Robert Carlson is Director of Management Services for the Council of the Great City Schools. In that capacity, he provides Strategic Support Teams and manages operational reviews for superintendents and senior managers; convenes annual meetings of Chief Financial Officers, Chief Operating Officers, Transportation Directors, and Chief Information Officers and Technology Directors; fields hundreds of requests for management information; and has developed and maintains a Web-based management library. Prior to joining the Council, Dr. Carlson was an executive assistant in the Office of the Superintendent of the District of Columbia Public Schools. He holds Ed. D. and M.A. degrees in administration from The Catholic University of America; a B.A. degree in political science from Ohio Wesleyan University; and has done advanced graduate work in political science at Syracuse University and the State Universities of New York.

David W. Koch

David Koch is the former Chief Administrative Officer for the Los Angeles Unified School District (LAUSD). The LAUSD is the nation's second largest public school system, with more than 700,000 students in grades K-12, an annual budget of more than \$9 billion, and more than 80,000 full- and part-time employees. Mr. Koch's responsibilities encompassed virtually all non-instructional operations of the District, including finance, facilities, information technology, and all of the business functions. Mr. Koch also served the LAUSD as Business Manager for over ten years, Executive Director of Information Services, and Deputy Controller. Mr. Koch was also Business Manager for the Kansas City, Missouri Public School District and was with Arthur Young and Company prior to entering public service. He is a graduate of the University of Missouri and a Certified Public Accountant in the states of California, Missouri, and Kansas. Currently a resident of Long Beach, California, Mr. Koch provides consulting services to public sector clients and companies doing business with public sector agencies.

Shirley Brooke

Shirley Brooke is the former Director of Food and Nutrition Services for the Jefferson County Public Schools (JCPS) in Colorado. JCPS is an 800 square mile school district with 85,000 students enrolled at 140 service sites. The district serves 65,000 lunches, 15000 breakfast, snack and a la carte meals to students daily, with an annual budget for Food Services of \$21 million and over 500 full and part time employees. JCPS Food Services operates a full service warehouse and distribution facility and manages all FS equipment repair services. Ms. Brooke was in Jefferson County Schools for 20 years including 8 as the Director, with Denver Public Schools for 5 years and with Jefferson County Adult and Child Care Food Program for 5 years. She is a graduate of Colorado

State University with a BS in Food Science and Nutrition. Shirley Brooke is currently a consultant with Alliance for School Food Service Leadership.

Michael Eugene

Michael Eugene is the Chief Operating Officer for the Orange (Florida) County Public Schools. In that capacity he leads Food & Nutrition Services, Transportation, Information Technology, Safety & Security, Procurement & Contracts, Warehouse Operations, and Building Code Compliance. Prior to joining Orange County he was Business Manager for the Los Angeles Unified School District. Mr. Eugene also served as the Chief Operating Officer for the Cleveland Metropolitan School District. Mr. Eugene serves in a voluntary capacity as co-director of the CGCS "Managing for Results" KPI Program. Before joining public education, Mr. Eugene was a management consultant in the private and not-for-profit sectors specializing in performance measurement, benchmarking, and public budgeting. Mr. Eugene holds a master's degree in public administration.

Helen Phillips

Helen Phillips is the Senior Director of School Nutrition for Norfolk Public Schools in Virginia and administers six federal food programs to the over 33,000 students of Norfolk across 52 school sites. The district has 66% of students approved for free or reduced price meals and serves over 14,000 breakfasts and over 22,000 lunches daily. School Nutrition operates a full warehouse and has a fleet of six refrigerated trucks that deliver to all schools every day. The department has an annual operating budget of \$17 million and 350 full and part time employees. Ms. Phillips has worked in school nutrition for twenty-one years, eighteen in Norfolk Public Schools. She is a past president of the School Nutrition Association.

Theresa Hafner

Theresa Hafner is the Executive Director of Food and Nutrition Services for the Denver Public Schools which has a district enrollment of over 80,000 students at 137 service sites, with 68% approved to receive free or reduced-price meal benefits. Denver Public Schools serves over 61,500 breakfasts, lunches and a la carte meals to students daily with an annual operating budget of almost \$40 million and over 600 full and part-time employees. Ms. Hafner has been with Denver Public Schools for over 18 years. Ms. Hafner holds a master's degree in organizational leadership.

CHARLESTON TRANSPORTATION REPORT



Review of the Transportation Program of the Charleston School District

May 2014

Michael Bobby, Chief Finance and Operations Officer of the Charleston County School District (CCSD), requested that the Council of the Great City Schools (CGCS) provide a high-level management review of the district's transportation program. Specifically, he requested that the Council¹—

- Review and evaluate the structural components of the district's transportation program, including the state-owned fleet of school buses, the contractor owned and operated fleet, and the district fleet of activity buses.
- Review and comment on the district's contract for transportation services and its pending Request for Proposals (RFP) for future services.
- Review and evaluate the management, organization, and staffing of the district's Transportation Department.
- Develop recommendations that would help the district's transportation operations achieve greater operational efficiencies, effectiveness, and sustainability.

In response to this request, the Council assembled a Strategic Support Team (the team) of senior managers with extensive experience in transportation operations from other major city school systems across the country. The team was composed of the following individuals. (Attachment A provides brief biographical sketches of team members.)

Robert Carlson, Project Director Director, Management Services Council of the Great City Schools

David Koch, Principal Investigator Chief Administrative Officer (Retired) Los Angeles Unified School District

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¹ The Council has conducted over 250 instructional, management, and operational reviews in about 50 big-city school districts over the last 15 years. The reports generated by these reviews have often been the foundation for improving the operations, organization, instruction, and management of many urban school systems nationally. These reports have also been the basis for identifying "best practices" for other urban school systems to replicate. (Attachment D lists the reviews that the Council has conducted.)

Doug Geller Director, Transportation Clark County Public Schools

Nathan Graf General Manager, Transportation Services Houston Independent School District

Art Hanby Strategic Sourcing & Contracts Officer San Diego Unified School District

Fred Schmitt Chief Financial Officer (Retired) Norfolk Public Schools

Shawn Tucker Director, Transportation Salt Lake City School District

The team conducted fieldwork for the project during a four-day site visit to Charleston on May 13-16, 2014. The team met with the Chief Finance and Operations Officer and the Director of Transportation on the first day of the site visit to better understand their expectations and objectives for the review and to make last-minute adjustments to the agenda. The team used the next two days of the site visit to conduct interviews with key staff members, examine documents and data, and conduct field visits. (The complete lists of individuals interviewed, sites visited, and materials reviewed are presented in Attachments B and C.)²

The final day of the visit was devoted to synthesizing and refining the team's findings and recommendations, and to providing the Chief Finance and Operations Officer and the Director of Transportation with a briefing on the team's preliminary findings.

The Council sent the draft of this document to team members for their review in order to affirm the accuracy of the report and to obtain their concurrence with the final recommendations. This management letter contains the findings and recommendations that have been designed by the team to help improve the operational efficiencies, effectiveness, and sustainability of the CCSD transportation program.

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² The Council's reports are based on interviews with district staff and others, a review of documents, observations of operations, and professional judgment. The team conducting the interviews must rely on the willingness of those interviewed to be truthful and forthcoming, but cannot always judge the accuracy of statements made by interviewees.

Background

The CCSD is the second largest school system in South Carolina representing a unique blend of urban, suburban, and rural schools that span 1,000 square miles of coastal lands. CCSD's enrollment exceeds 47,000 students in 84 schools and several specialized programs. The Transportation Department (DoT) of CCSD provides transportation services to 26,000 of the district's students on a daily basis.

Most district students are transported on 286 South Carolina state-owned and maintained buses.³ The remaining students, who do not meet state transportation-eligibility criteria, are transported on 126 contractor-owned buses.⁴ The contractor provides drivers for all buses as well as routing services and operational management for the combined fleet. The contractor also provides transportation services for field trips and events, as requested.

The district, for its part, owns a fleet of 61 activity buses, which are housed at secondary school sites and operated by school-based personnel. These buses are maintained by an outside third-party contractor.

The district employs a program administrator (the Director of Transportation) and an assistant to oversee the bus contractor. The district is approaching the end of a contract extension with the current bus contractor and has developed a draft Request for Proposals (RFP) for future bus services.

Findings and Observations

The findings and observations of the Council's Strategic Support Team are organized into four general areas: Commendations, State Issues, Contract and RFP Issues, and Management Issues. These findings are followed by a set of recommendations for the district.

Commendations

- The CCSD administration is acutely aware of the urgency surrounding the transportation issues identified in this report and has been proactive in its attempts to bring attention and resolution to these problems.
- The district's central control of school bell schedules allows for the efficient use of multitiered routing of school buses. For example, the district reported 4.24 daily runs per bus compared to the median reported by CGCS districts of 3.75 daily runs per bus.⁵

³ State eligible students are those regular and special education students who meet the state's transportation criteria.

⁴ Ineligible students include those transported to choice and magnet schools.

⁵ Source: Managing for Results in America's Great City Schools, Results from Fiscal Year 2011-12, October 2013, The Council of the Great City Schools.

- Contracted management and routing personnel appeared to be knowledgeable, competent, and attuned to the transportation issues faced by the district.
- A new five-year labor agreement between the bus contractor and its drivers' union should lessen the district's exposure to the risks of a work stoppage.

State Issues

- The fleet of school buses provided by the state is old, ill-equipped, and poorly maintained, creating a risk to pupils and public safety. For example
 - o Some 54 percent of state-owned buses are over 15 years old.
 - O The team was told that -
 - None of the regular-education state buses have air conditioning
 - About 69 percent of the state's special-needs buses do not have air conditioning
 - None of the state buses have GPS technology for monitoring bus movement
 - Some state buses do not have operating cameras to document student and driver behavior.
 - The reported breakdown rate of state-maintained buses averaged 15 percent for the past two years (compared to less than 1 percent for the contracted fleet).
 - The team observed a state bus without functioning taillights and saw many state buses that were extraordinarily dirty.
 - The team had the following observation relating to the state's Azalea garage facility, including –
 - There appeared to be an excessive number of derelict buses that have either been cannibalized for spare parts or currently in that process (See Exhibit 1 on the next page).
 - The housekeeping at the facility was deplorable.
 - The site appeared to have environmental risks, particularly related to oil discharge abatement and storm-water run-off.



Exhibit 1. State's Azalea School Bus Garage

Prepared by CGCS

- The state is not meeting its capital-funding obligations to buy replacement buses. Under current state law, South Carolina is obligated to replace 1/15th of the state-owned bus fleet each year,⁶ which is clearly not happening in Charleston County. For example
 - o If the state were replacing $1/15^{th}$ of the fleet each year, the average age of the school buses would be about $7\frac{1}{2}$ years.
 - The weighted-average age of state buses as computed by CGCS to be more than 14 years.⁷
- The state is not meeting its funding obligations to provide reimbursements for contracted transportation services. Under state law, CCSD may contract for its student transportation services and receive aid from the state based on the average per pupil operating cost of state-owned equipment, as determined by the State Board of Education.⁸ However, to date, this reimbursements has not been forthcoming
 - o The State Board of Education has apparently not determined "the average per pupil operating cost of state-owned equipment".9

⁶ SECTION 59-67-580. Replacement cycle; funding.

⁷ District calculations have the average age of state buses at 17 years, based on the average year of manufacture in 1997.

⁸ SECTION 59-67-460. Contracts for transportation services with private individuals or contractors; State aid

⁹ Efforts by both CCSD staff and the CGCS team were unsuccessful in obtaining a definition or a dollar amount for the "average per pupil operating cost of state-owned equipment" from the State Department of Education.

- The team found several potential sources for an "average per pupil operating cost of state-owned equipment" in a State Department of Education report¹⁰ that could result in a reimbursement level ranging from \$8.5 to \$16.8 million for the District.¹¹
- On February 5, April 19, and April 23, 2014, the CCSD Director of Transportation sent letters to the Director, Office of Transportation, South Carolina Department of Education requesting reimbursement under this statute.
- The CCSD Superintendent sent a request to the state superintendent dated April 30, 2014 requesting \$14.4 million reimbursement under the provisions of this law.
- In 2010-11 the state covered an average of 45 percent of all state-wide transportation costs, but CCSD receives only 33 percent of its total costs in the form of state-owned buses. To illustrate
 - The CGCS team located a state report¹² indicating that, for FY 2010-11, the state spent \$4.1 million on maintenance and \$1.7 million on salaries for its fleet in Charleston County.
 - This same report shows the district spending almost \$12.0 million for transportation services.
 - Therefore, of the total state and local spending amounting to \$17.8 million, the state provided only 32.6 percent to CCSD, compared to the overall average of 45 percent for all South Carolina school districts.
 - The primary reason for this funding shortfall is that the district chooses to transport students who are ineligible under the state criteria.

Contract and RFP Issues

• The current contract for school bus services includes the critical function of bus routing and scheduling, which creates an inherent conflict of interest because the contractor is paid on a per-bus basis (i.e., the more buses that are scheduled, the more revenue that is generated for the contractor).¹³

¹⁰ Fiscal Year 10-11 State Transportation Expense and Operations Data and District Expense Data (Non-Capital) Except Williamsburg District, South Carolina Department of Education.

¹¹ The team found three average pupil operating costs in state reports including "Daily Trip Enrollment" equaling \$166 per bus/ per day, "Daily Trip Load Count" equaling \$248 per bus / per day, and "Peak Enrollment Demand" equaling \$329 per bus/per day. However, no definitions were provided for these factors.

¹² Source: Fiscal Year 10-11 State Transportation Expense and Operations Data and District Expense Data (Non-Capital) Except Williamsburg District, South Carolina Department of Education.

¹³ It should be noted that the CGCS team saw no evidence that the contractor was assigning unneeded buses.

- The current contract does not address the ownership of student and routing data that resides on the contractor's computer system, which could put the district at risk.¹⁴
- The contract does not adequately address the training of contract drivers, particularly in the area of pupil management, based on comments from school principals.
- The current contract does not provide for a structured management reporting system or direct access by the DoT to GPS and other relevant data.
- The draft RFP for future transportation services reviewed by the team had significant shortcomings in multiple areas. For example
 - The document is structured more like a bid than an RFP and is heavily weighted to price factors.
 - o It does not provide options for replacing state-owned buses with contract buses.
 - o It does not specify the number and types of buses required and the service level requirements are vague.
 - o It does not establish specifications to maximize efficiencies, effectiveness, or cost controls and does not contain adequate reporting requirements.
 - o Performance consequences and liquidated damages are understated.
 - o It gives preference to the current contractor by specifying the use of the current routing software system.
 - o It does not sufficiently mitigate liability risk factors, including environmental risks.
- The Director of Purchasing lacks the appropriate staff to develop the school bus services RFP or negotiate the final contract and has not retained an expert consultant to assist.
- The district does not subscribe to an Oil Price Information Service (OPIS) to assist in evaluating the gas price fluctuation pass-throughs that are contained in the current contract.

Management Issues

- The district's DoT office is not adequately staffed or resourced to effectively manage the transportation contract. For example
 - o There are no field supervisors to monitor daily school-bus operations.

¹⁴ The team was told that the district has engaged a third party to assist with copying and importing all student and transportation data held by the current bus contractor.

- The district only charged the contractor with \$40,000 in liquidated damages on the \$13 million contract, which may be indicative of inadequate district oversight, weak contract language, or both.
- o There is no specific contract-administration function designated in the district.
- The DoT does not have a business plan or established goals for the Director that are linked to the district's strategic plan.
- The team saw no evidence that performance measures and benchmarks are used on a regular basis by the district or the contractor to manage the transportation operation.
- Data and financial analyses are not well utilized to administer the program. For example
 - o Enrollment projections are not translated into ridership forecasts for planning purposes.
 - o Both the district and the contractor were requested to provide ridership data (i.e., eligible vs actual riders) and on-time performance evidence (based on GPS data), but this information was not provided to the team. The team concluded that either the data did not exist or that no one wanted the team to see it.
 - O Data available from state reports are not analyzed to determine comparability with other school systems.
 - The team saw no evidence that the district's administration considers the long-term cost consequences of pupil transportation decisions.
 - o It was reported to the team that there are frequent last minute requests for unbudgeted transportation services.
 - The team was told that the contractor paid state fines of almost \$350,000 for ineligible transportation.
- The trifurcation of school-bus maintenance (state, contractor, and activity buses) is not optimal and results in built-in inefficiencies.
- The contractor has multiple dispatch operations, rather than a more efficient centralized dispatch function.
- The location and layout of the contractor's Azalea bus lot is not conducive to an emergency evacuation nor does it enhance efficient operations because of its distance from many of the areas that it serves.
- While the monthly surveys of school principals tended to yield favorable results, the principals interviewed by the team raised a number of serious issues with the transportation program. For example -

- o Principals were well aware of the quality and reliability differences between stateowned and contractor buses.
- o Principals reported that they spend a disproportionate amount of time on transportation-related issues, including discipline referrals.
- o Principals reported high driver turn-over on selected routes.
- o Principals indicated that state buses are overcrowded.
- o Principals complained that there are inadequate numbers of aides for special education buses.
- o DoT was characterized by many principals interviewed as always looking for the "cheapest way out."
- The DoT does not document complaints and has no systematic way to ensure responses have been provided to all inquiries.
- A transportation representative is not present at IEP meetings that result in the transportation of special education students.
- The district assumes unreasonable risk and liability by assigning the oversight for the operations and maintenance of activity buses to school sites.
- Ride times for regular and special education students exceeded CGCS Key Performance Indicator (KPI) medians. For example –
 - The estimated average daily ride time for a single trip (one-way) for a general education student in CCSD was 40 minutes, compared to a median of 35 minutes reported for CGCS districts.¹⁵
 - The estimated average daily ride time for a single trip (one-way) for a special education student in CCSD was 65 minutes, compared to a median of 42 minutes reported for CGCS districts.¹⁶

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¹⁵ Source: Managing for Results in America's Great City Schools, Results from Fiscal Year 2011-12, October 2013, The Council of the Great City Schools.

¹⁶ Source: *Ibid*.

Recommendations

The following recommendations were developed by the team to help improve the operational efficiencies, effectiveness, and sustainability of the CCSD transportation program. The implementation of these recommendations may require extension of the current contract for transportation services for a reasonable period in order to accommodate structural changes to the program.

- 1. In the absence of significant improvement in the age and condition of the state-owned bus fleet, continue to pursue strategies that would result in a district-controlled, contractor-owned and operated school bus fleet. CGCS estimates an increased cost of approximately \$6 million¹⁷ (an increase in the current budget of \$14 million to \$20 million) to contract for the entire home-to-school transportation program. Potential sources of state funding for this purpose include
 - The state reported in 2010-11 that it spent \$5.8 million for school bus maintenance and salaries in Charleston County (excluding capital costs), as reported above. If the state were to close its Charleston bus operations and provide the \$5.8 million to the district, it could fund most of the additional cost of a district controlled, contractor-owned and operated bus fleet.
 - If the state met its funding obligation to provide reimbursements for contracted transportation services, it would likely cover the costs of the recommended program.
 - It would cost the state about \$12 million to replace the buses in its Charleston County fleet that are over 15 years old. In addition, if the state met its obligation to replace 1/15th of the fleet each year, the action would amount to approximately \$1.6 million per year. If redirected, these funds could help finance the recommended program for a number of years.
- 2. Engage an experienced contracting expert to assist in the development of an RFP for comprehensive school bus services, including the option of operating a totally contracted fleet (absent any state-owned buses) and the option of using multiple bus service providers. Services of the expert should include assistance in the evaluation of proposals and negotiations of the final contract. The RFP and resulting contract should provide for --
 - The adequate training of drivers, particularly in the area of pupil management
 - A structured management-reporting system
 - The number and specific types of buses required

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¹⁷ Note that the estimate of a \$6 million increase is based on current contracting rates and does not include possible additional costs associated with expansion of the contractor's fleet.

- Specific service-level requirements
- Specifications to maximize efficiencies, effectiveness, and cost controls
- Strong performance consequences and liquidated damages
- Mitigation of liability risks, including environmental risks.
- 3. Contract for a comprehensive approach to route planning and scheduling that maximizes the use of technology and best practice methodologies and improves the quality and timeliness of routes, reporting directly to the district's Director of Transportation.
- 4. Augment the staff resources in the DoT, so the transportation program can be effectively managed. Exhibit 2 below depicts a proposed functional organization for the DoT. Of particular note in this proposed organization are the following
 - The contracted bus routing and scheduling function reports directly to the Director of Transportation.
 - The quality-assurance unit monitors school-bus operations, including on-time performance, breakdown rates, bus cleanliness, pupil-load factors (overcrowding or underutilization), equipment functionality, and reviews all management reports to ensure their accuracy and completeness, so the DoT can make data-driven decisions and effectively assess performance.
 - The contract administration position is responsible for ensuring that all contract provisions are adhered to. The administrator ensures quality, documents non-performance, facilitates problem resolution, and coordinates contract extensions, amendments, and terminations.
 - The database project manager ensures coordination of the student data system with the routing system, school bus rosters, and a parent link, and provides the data analysis function in the DoT.

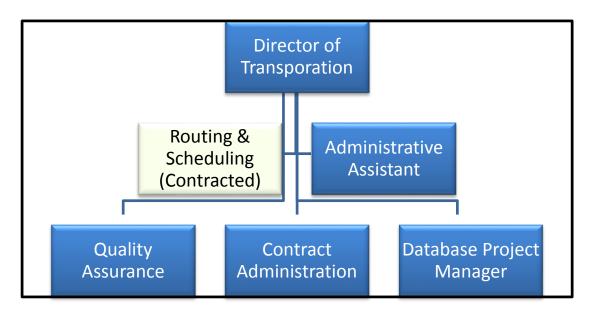


Exhibit 2. Proposed DoT Functional Organization Chart

- 5. Ensure that individuals placed in positions in the new functional organization have the appropriate skills, expertise, experience and the on-going training to be successful.
- 6. Develop a formal and comprehensive strategic business plan for the Department of Transportation, including
 - A departmental vision linked to the CCSD vision statement and strategic plan
 - Formal internal and interdepartmental action plans and schedules, including timelines and tasks associated with:
 - Annual route planning
 - o Budget development
 - Training and professional development
 - Technology implementation
 - Defined performance measures, including KPIs and industry standards, for all major functions of the department.
- 7. Establish documentation and communications systems to ensure that all complaints are addressed and all inquiries are responded to on a timely basis.
- 8. Divest the district of the risks and liabilities associated with the operation and maintenance of activity buses at school sites and contract these services (under the master transportation contract).

Review of the Transportation Department of the Charleston County School District

- 9. Decentralize the Azalea bus lot to more efficient, smaller satellite lots closer to the areas that they serve.
- 10. Include representatives of the DOT in special education IEP conferences, as appropriate.
- 11. Subscribe to an Oil Price Information Service (OPIS) to assist in the evaluation of contractual gas price fluctuation pass-throughs.
- 12. Enhance the efficiency and effectiveness of the dispatch operation by centralizing this function.

ATTACHMENT A. STRATEGIC SUPPORT TEAM

Robert Carlson

Robert Carlson is Director of Management Services for the Council of the Great City Schools. In that capacity, he provides Strategic Support Teams and manages operational reviews for superintendents and senior managers; convenes annual meetings of Chief Financial Officers, Chief Operating Officers, Transportation Directors, and Chief Information Officers and Technology Directors; fields hundreds of requests for management information; and has developed and maintains a Web-based management library. Prior to joining the Council, Dr. Carlson was an executive assistant in the Office of the Superintendent of the District of Columbia Public Schools. He holds doctoral and master degrees in administration from The Catholic University of America; a B.A. degree in political science from Ohio Wesleyan University; and has done advanced graduate work in political science at Syracuse University and the State Universities of New York.

David W. Koch

David Koch is the former Chief Administrative Officer for the Los Angeles Unified School District (LAUSD). The LAUSD is the nation's second largest public school system, with more than 700,000 students in grades K-12, an annual budget of more than \$9 billion, and more than 80,000 full- and part-time employees. Mr. Koch's responsibilities encompassed virtually all non-instructional operations of the District, including finance, facilities, information technology, and all of the business functions. Mr. Koch also served the LAUSD as Business Manager for over ten years, Executive Director of Information Services, and Deputy Controller. Mr. Koch was also Business Manager for the Kansas City, Missouri Public School District and was with Arthur Young and Company prior to entering public service. He is a graduate of the University of Missouri and a Certified Public Accountant in the states of California, Missouri, and Kansas. Currently a resident of Long Beach, California, Mr. Koch provides consulting services to public sector clients and companies doing business with public sector agencies.

Doug Geller

Doug Geller is a Director of Transportation for the Clark County School District (CCSD) located in Las Vegas, Nevada. Among previous positions he coordinated Special Needs Transportation and supervised Routing & Scheduling. The fleet exceeds 1500 buses of which 600 are wheelchair capable. CCSD is 5th largest in the USA in terms of enrollment and has over 350 schools in the over 8,000 square mile County. He is a retired USAF Staff Transportation Officer and former Transportation Manager, Site Administrator & Program DoT for Northrop in Saudi Arabia. He also worked with the Dept. of Defense Dependent Schools setting up bus management offices throughout Europe. He worked with writers for the NCST National School Transportation Specifications & Procedures Handbook and is a member of the Nevada & National Association for Pupil Transportation. Mr. Geller attended NYS Maritime College at Fort Schuyler, major, Marine Transportation & C.W. Post College, LIU earning a BS degree in

Business Administration, minor- Sociology. His masters' study was in Educational Sociology at Wayne State University.

Nathan Graf

Nathan Graf is General Manager of Transportation Services for The Houston Independent School District (HISD). HISD serves over 200,000 students and is the seventh largest school district in the nation. Mr. Graf oversees the largest school district fleet operations in Texas. He is directly responsible for transporting over 29,000 students daily, 1000 school buses, 1050 white fleet vehicles, and a budget of over \$40 million. Mr. Graf has been employed with HISD since July 2002 and has served in a number of management roles, each with increasing responsibility, Mr. Graf earned a master's degree in business until being promoted to his current position. administration from the University of Texas in 1994, graduating in the top ten percent of his class and earning the distinction of a Sord Honors Graduate. Mr. Graf came to HISD from KPMG Accounting, L.L.P., where he had moved up from staff accountant to senior manager in just three years. Under Mr. Graf's leadership, the transportation department for HISD has earned several industry awards such as earning a spot in the Government Fleet top 100 fleets for 2011 and 2012, and was also ranked as the top school district green fleet in the nation. In addition, the department received the Clean Air Champion Award from The Houston-Galveston Area Council in 2011. And finally, the transportation department for HISD was one of two districts in the country nominated for the National Association for Pupil Transportation (NAPT) Larson Quality Award in 2012.

Art Hanby

Art Hanby is the Strategic Sourcing & Contracts Officer for the San Diego Unified School District (SDUSD). SDUSD is the second largest district in California and serves nearly 133,000 students with over 250 educational facilities. Mr. Hanby oversees a staff of 65 employees in Procurement, Materiel Control, Warehouse Distribution and Receiving, Mail Services and Printing Services. Prior to working at SDUSD, Mr. Hanby was the Deputy Chief Contracting Officer and Executive Director for the Detroit Public Schools and the Director of Purchasing and Warehousing for The School Board of Broward County in Fort Lauderdale, Florida. Mr. Hanby has a Bachelor's Degree from the University of Delaware and a Master's Degree in Business Management from Central Michigan University. He is both a Certified Public Purchasing Officer (CPPO) and Certified Professional Public Buyer (CPPB), and holds Lifetime certification as both a Certified Purchasing Manager (C.P.M.) and Accredited Purchasing Practitioner (A.P.P.). Mr. Hanby is a member of the National Institute of Governmental Purchasing, the Association of School Business Officials, International and the U.S. Communities Advisory Board.

Frederick Schmitt

Frederick Schmitt retired as the Chief Financial Officer of the Norfolk Public Schools (NPS) in 2008 after serving 11 years. NPS educates 35,000 children with an annual operating budget of \$330 million and 6,000 full and part time employees. NPS won the Broad Foundation Prize for Urban Education in 2005. Prior to joining public education, Mr. Schmitt had a long and

successful career in finance, management, and operations, including serving as a consultant with American Management Systems, Inc., and as the Chief Executive Officer (Commanding Officer) of the U.S. Coast Guard National Finance Center in Virginia. A graduate of the U.S. Coast Guard Academy, he received his MBA degree from The George Washington University. He has been recognized for Outstanding Leadership in Urban Education by the Council of Great City Schools, and he co-chaired a major national effort with the Council to examine the effectiveness of business operations in large urban districts. Mr. Schmitt has served on a number of District Technical Assist Visits as a team member for the Council of Great City Schools. Mr. Schmitt continues to work as a consultant for various K-12 districts in the area of business operations.

Shawn Tucker

Shawn Tucker is the Director of Transportation for the Salt Lake City (SLC) School District. Before becoming Director of Transportation for the SLC School District, Mr. Tucker was the Coordinator of Transportation for the Osceola County School District in Florida, where he supervised over 550 employees and buses. He is currently directly responsible for 175 employees and buses. Mr. Tucker earned a bachelor's degree in business administration from the Florida Metropolitan University. Mr. Tucker currently serves on city and county boards comprising of the Multi-City Disciplinary Committee and the County Emergency Advisory Committee, along with proactively addressing student safety and transportation logistics.

HISTORY OF STRATEGIC SUPPORT TEAMS

History of Strategic Support Teams Conducted by the Council of the Great City Schools

City	Area	Year
Albuquerque		
	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005
	Legal Services	2005
	Safety and Security	2007
	Research	2013
Anchorage		
	Finance	2004
	Communications	2008
	Math Instruction	2010
	Food Services	2011
	Organizational Structure	2012
	Facilities (Pending)	2014
Atlanta		
	Facilities	2009
	Transportation	2010
Austin	Trumsportunion	2010
11000111	Special Education	2010
Baltimore	Special Education	2010
D WILLIAM TO THE TOTAL THE TOTAL TO THE TOTAL THE TOTAL TO THE TOTAL THE TOTAL TO T	Information Technology	2011
Birmingham	internation remainings	2011
2	Organizational Structure	2007
	Operations Operations	2008
	Facilities	2010
	Human Resources	2014
Boston	Transactives	2011
Boston	Special Education	2009
	Instruction	2014
	Food Services	2013
Bridgeport	1 odd Bel vices	2013
Bitageport	Transportation	2012
Broward County (FL)	Tunsportation	2012
Dioward County (1 L)	Information Technology	2000
	Food Services	2009
	Transportation	2009
	Information Technology	2012
Buffalo	information reciniology	2012
Duriano	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	2000

r -		2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
	Special Education	2014
Caddo Parish (LA)		
	Facilities	2004
Charleston		
	Special Education	2005
	Transportation	2014
Charlotte-Mecklenburg		
	Human Resources	2007
	Organizational Structure	2012
	Transportation	2013
Cincinnati	•	
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
	Special Education	2013
Chicago		
- meugs	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012
	Bilingual Education	2014
Christina (DE)	Diffigual Education	2014
Ciristina (DL)	Curriculum and Instruction	2007
Cleveland	Curriculum and instruction	2007
Cicvetand	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	1	
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
Columbus		2004
	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Transportation	2009
Dallas		
	Procurement	2007
	· ·	

	Staffing Levels	2009
Dayton	Ü	
	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005
	Curriculum and Instruction	2008
Denver		
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
_	Curriculum and Instruction	2008
	Common Core Implementation	2014
Des Moines		
	Budget and Finance	2003
	Staffing Levels	2012
	Human Resources	2012
Detroit		
	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004
	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
_	Finance and Budget	2008
_	Information Technology	2008
	Stimulus planning	2009
	Human Resources	2009
Fresno		
	Curriculum and Instruction	2012
Greensboro		
	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
Hillsborough County (FLA)		
	Transportation	2005
	Procurement	2005
	Special Education	2012
Houston	25	2012
	Facilities Operations	2010

	Capitol Program	2010
	Information Technology	2011
	Procurement	2011
Indianapolis	1100010111	
	Transportation	2007
	Information Technology	2010
	Finance	2014
Jackson (MS)		-
,	Bond Referendum	2006
	Communications	2009
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
Kansas City		
•	Human Resources	2005
	Information Technology	2005
	Finance	2005
	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006
	Program Implementation	2007
	Stimulus Planning	2009
Little Rock		
	Curriculum and Instruction	2010
Los Angeles		
	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville		
	Management Information	2005
	Staffing Levels	2009
Memphis		
	Information Technology	2007
Miami-Dade County		
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
	Information Technology	2013
Milwaukee		

	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
	Human Resources	2013
	Information Technology	2013
Minneapolis	Information Teenhology	2013
14111111Cupons	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
Nashville	1 cdcrui i rogrums	2004
Tasiiviiic	Food Service	2010
	Bilingual Education	2014
Newark	Diffigual Education	2017
1 1C W al K	Curriculum and Instruction	2007
	Food Service	2007
New Orleans	1 TOOU SELVICE	2006
New Officialis	Personnel	2001
	Transportation	2001
	Information Technology	2002
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2005
New York City	Curriculum and mstruction	2000
New Fork City	Special Education	2008
Norfolk	Special Education	2008
NOTIOIK	Testing and Assessment	2003
	Curriculum and Instruction	2012
Orange County	Curriculum and mstruction	2012
Orange County	Information Technology	2010
Philadelphia	Information Technology	2010
Pililadelpilia	Curriculum and Instruction	2003
		2003
	Federal Programs Food Service	2003
	Facilities Facilities	2003
	Transportation	2003
	Human Resources	2003
	Budget	2008
	Human Resource	2009
	Special Education	2009
D'u-11-	Transportation	2013
Pittsburgh		2005
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
B .1 .1	Special Education	2009
Portland		

	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Prince George's County		
<u> </u>	Transportation	2012
Providence	1	
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special Education	2011
	Bilingual Education	2011
Reno		
	Facilities Management	2013
	Food Services	2013
	Purchasing	2013
	School Police	2013
	Transportation	2013
	Information Technology	2013
Richmond		
	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
	Human Resources (Pending)	2014
Rochester		
	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
San Diego		
	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco		
	Technology	2001
St. Louis		
	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
St. Paul		
	Special Education	2011
	Transportation	2011
Seattle		
	Human Resources	2008

	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
	Capital Projects	2013
Toledo		
	Curriculum and Instruction	2005
Washington, D.C.		
	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005
	Curriculum and Instruction	2007
	Common Core Implementation	2011
Wichita		
	Transportation	2009

FINANCE TASK FORCE

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Urban School Finance

2014-2015

Task Force Goals

To challenge the inequities in state funding of urban public schools.

To increase federal funding and support of urban public schools.

To pass new federal school infrastructure legislation to help repair, renovate and build urban public school buildings.

To enhance the ability of urban schools to use Medicaid for health services to students.

Task Force Co-Chairs

Thomas Ahart, Des Moines Superintendent Larry Feldman, Miami-Dade County School Board

CHIEF FINANCIAL OFFICERS MEETING



Chief Financial Officers Conference

Striving for Excellence in Financial Management

November 11-14, 2014

Sheraton New Orleans Hotel 500 Canal Street New Orleans, LA 70130 504-525-2500



Council of the Great City Schools

Under the rubric, *Managing for Results*, the meeting will focus on how districts can produce better results and regain public confidence in a highly compliant and regulatory environment at a time when they face a higher level of scrutiny than ever before.

Who Should Attend:

- >Chief Financial Officers
- >Key Finance staff (Budget Directors, Accounting Directors)
- >Risk Managers
- >Directors of Procurement
- >Internal Auditors
- >Senior Management

Focus:

CFOs, Key Finance Staff, Risk Managers, Procurement Directors and Internal Auditors will discuss important issues they have selected that will include, but not limited to--

- > Monitoring the Affordable Care Act (ACA) including Employer Mandates and the 2018 Excise Tax
- > Impact of GASB Accounting Standards
- > Deferred Maintenance: Its Cost Consequences
- > Risk Managing Charter Schools
- > Summer School Spending
- > Managing Vendor Performance
- > Metrics, Benchmarking and Performance Management
- > Cyber Security & Liability
- > The "Value-Add" Proposition
- > Cost Indicators and Academic Performance Measures

- > E-Procurement
- > Property Insurance/FEMA
- > Reverse Auctions/Piggyback Contract/ Consortiums/State Contracts
- > Disaster Recovery, Contingency and Business Continuity
- > Tort liability, Compliance, FERPA
- > Internal Control
- > Surplus Sales and On-Line Auctioneering
- > Performance Auditing
- > How the Auditing Function Should Be Organized
- > Quality Assurance

Meeting Format:

Attendees will meet in general sessions, separately in breakout sessions and concurrently when appropriate.

- > **Tuesday, November 11** General sessions with the CFOs, Key Finance Staff, Directors of Procurement, Risk Managers and Internal Auditors
 - "Round Robin" discussions on the issues and challenges large school districts face
 - Working sessions on Performance Measurement & Benchmarking (KPI) to improve operational effectiveness, achieve efficiencies and generate costs savings
- > **Wednesday, November 12** Separate Breakout Sessions with the CFOs and Key Finance Staff, Directors of Procurement, Risk Managers, and Internal Auditors
 - Discussions on priority issues each of the groups face in large public school districts; and presentations on standards or best practices to address them
- > **Thursday, November 13** Concurrent Sessions with the CFOs, Key Finance Staff and Directors of Procurement; CFOs, Key Finance Staff and Risk Managers; and CFOs, Key Finance Staff and Internal Auditors
 - "Report outs", discussions and panel presentations on the priority issues from the breakout sessions
- > **Friday Morning, November 14** General Session with the CFOs, Key Finance Staff, Directors of Procurement, Risk Managers and Internal Auditors
 - "Round Robin" discussions on remaining issues large school districts face
- > Wrap Up and Departures.

CHIEF FINANCIAL OFFICERS (CFO)

November 11-14, 2014 Conference Registration Form

Organization:		Title:	
Address:			
City:		State:	Zip Code:
Telephone #: ()	1	Fax #: ()	
C-mail:			
) \$150	Council School District Memb		
) \$250	School District Non Member		- 4° • 6)
) WAIVED) \$575	Company Sponsoring - (each Additional person from Comp		ation form)
) \$1,500	Companies NOT Sponsoring		
Enclosed: () che	ck# () purchase	order#	
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) Visa () Master card () American	Express () Disc	
) Master card () American	-	
Card#	, ,	Exp. Date:	
Card#Signature:S		Exp. Date: 3 digit #	

REFUND AND CANCELLATION POLICY:

All cancellations, refund requests or substitutes must be made in writing and faxed to (202) 393-2400. Registration cancelled on or before October 20th, will receive a full refund. Cancellations made after October 20th and before November 1st will be billed or refunded 50% of the registration fee. Cancellations after November 1st or no shows on November 11th will not receive a refund and will be billed the full amount. For Checks, have invoice number, registrant name & conference name listed on check.

HOTEL INFORMATION;

Please make Hotel reservations directly with the Sheraton 504 525-2500. Mention CGCS. All reservations must be confirmed with a credit card. The cutoff date for the group rate is October 20th and room rates are \$199.00/per night, single and double, plus 13% sales tax. Support CGCS and secure your guest rooms within the official headquarter hotel. (Rooms are limited).

For questions contact Terry Tabor or Anna Barrera at: (202) 393-2427

Return this entire form with payment to:

Council of the Great City Schools

1301 Pennsylvania Avenue, N.W., Suite 702, Washington D.C., 20004

Fax credit card payment or purchase order number to: (202) 393-2400



Council of the Great City Schools 1301 Pennsylvania Avenue, N.W. Suite 702 Washington, D.C. 20004

> 2014 Chief Financial Officer Conference New Orleans, NO November 11 - November 14, 2014

CFO Annual Meeting

Sheraton Hotel, New Orleans November 11-14, 2014

Chief Finance Officers, Risk Managers, Internal Auditors & Procurement Directors – Agenda

Tuesday Morning November 11		
Trotomosi ==	Registration	
7:00 - 8:00 a.m.	Breakfast	
	Joint Session with All	Activity
	Attendees	
8:00 - 8:45 a.m.	Welcome and Introductions	
9:00 - 10:00 a.m.	Issues and Challenges in Urban Education	Round Robin
10:0 0– 10:15 a.m.	Break	
10:30 - 11:30 a.m.	Addressing the Challenges	Round Robin
11:45 - 12:00 Noon	Wrap Up	
Tuesday Afternoon		
November 11		
12:00 - 1:00 p.m.	Lunch	
	Joint Session with All	Activity
	Attendees	
1:00 - 1:15 p.m.	KPI Overview	Presentation
1:30 - 2:00 p.m.	KPIs In Action	Tutorial
	Using KPIs to Add value	
	Use of KPI Scorecards	
	Using the Performance	
	Management System	
2:15- 2:30 p.m.	Break	
	Breakouts	Activity
2:45 - 3:45 p.m.	Chief Financial Officers	KPIs that are used, that work, are
	Procurement Directors	needed for further development,
	Risk Managers	and need to be added in Finance,
	Internal Auditors	Risk, Auditing, and Procurement
	Platinum Sponsors	
	Joint Session with All	Activity
	Attendees	
4:00 - 4:45 p.m.	KPI Work Plan Going Forward	Report Outs
5:15	Tomorrow's Agenda	
5:30 -	Welcome to New Orleans	
Wednesday Morning		
November 12		

Registration 7:00 - 8:00 a.m. Breakfast Breakouts Round Robin - Issues & in Urban School Financial Officers 8:45 - 9:30 a.m. Chief Financial Officers Presentation #1 - Defendante Maintenance Task For Maintenance Task For Maintenance Task For Presentation #2 - Add Costs 10:15 - 10:45 a.m. Chief Financial Officers Presentation #3 - Small Spending 12:00 - 1:00 p.m. Lunch Wednesday Afternoon November 12 Breakouts Activity 1:15 - 1:45 p.m. Chief Financial Officers Presentation #4 - Man Charter Schools 2:00 - 2:30 p.m. Chief Financial Officers Presentation #5 - Priv	& Challenges ace ferred arce dressing the arter School
8:15 – 8:30 a.m. Chief Financial Officers Round Robin - Issues & in Urban School Financial Officers Presentation #1 – Deformation Maintenance Task Formula Officers 9:45 – 10:00 a.m. Break Chief Financial Officers Presentation #2 – Add Costs 11:00 - 11:45 p.m. Chief Financial Officers Presentation #3 – Smar Spending 12:00 - 1:00 p.m. Lunch Wednesday Afternoon November 12 Breakouts Activity 1:15 – 1:45 p.m. Chief Financial Officers Presentation #4 – Mar Charter Schools	& Challenges ace ferred arce dressing the arter School
in Urban School Finance 8:45 - 9:30 a.m. Chief Financial Officers Presentation #1 - Deformation Maintenance Task Form 9:45 - 10:00 a.m. Break 10:15 - 10:45 a.m. Chief Financial Officers Presentation #2 - Add Costs 11:00 - 11:45 p.m. Chief Financial Officers Presentation #3 - Smarting Spending 12:00 - 1:00 p.m. Lunch Wednesday Afternoon November 12 Breakouts Activity 1:15 - 1:45 p.m. Chief Financial Officers Presentation #4 - Marting Charter Schools	dressing the arter School
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1:15 – 1:45 p.m. Chief Financial Officers Presentation #4 – Mar Charter Schools	naging
2:00 – 2:30 p.m. Chief Financial Officers Presentation #5 – Priv	
Exchanges	ate
3:15 – 3:30 p.m. Break Presentation #6 – GAS	BB Standards
3:45 – 4:30 p.m. Chief Financial Officers Round Robin - Discuss	ion
4:45 – 5:15 p.m. Chief Financial Officers Wrap Up	
5:30 Reception & Awards Presentation	
Thursday Morning	
November 13	
Registration	
7:00 - 8:00 a.m. Breakfast	
Joint Session Activity	
8:15 – 9:45 a.m. Chief Financial Officers Panel - Addressing the Risk Managers Challenges in Risk Mar	
Internal Auditors	nagement
10:00 – 10:15 a.m. Break	
Joint Session Activity	
10:30 – 12:00 noon Chief Financial Officers Panel - Addressing the	
Internal Auditors Challenges in Internal	Auditing
Risk Managers	
Thursday Afternoon November 13	
12:00 - 1:00 p.m. Luncheon	
Joint Session Activity	
1:15 - 2:45 p.m. Chief Financial Officers Panel – Addressing the	
Risk Managers Challenges in Procurer	ment
Internal Auditors	
3:00 - 3:15 p.m. Break	
3:30 - 5:00 p.m. Chief Financial Officers Panels – Strengthening	σ
Procurement Directors Performance and Rest	_
Risk Managers Confidence	5

	Procurement Directors	Where We've BeenWhere We AreWhere We Need To GoHow Do We Get There
5:15 -	Wrap Up	
5:30 -		Enjoying New Orleans - Dinner on Own
Friday Morning		
November 14		
7:00 - 8:00 a.m.	Breakfast	
	Joint Session	Activity
8:00 – 9:30 a.m.	Issues & Challenges	Round Robin
9:30 - 9:45 a.m.	Break	
10:00 –11:30 a.m.	Best Practices	Round Robin
11:30 -	Wrap Up & Departures	

INDIANAPOLIS FINANCE REPORT

Review of the Business and Finance Department of the Indianapolis Public Schools

By the

Council of the Great City Schools



June 2014

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Review of the Business and Finance Department of the Indianapolis Public Schools By the Council of the Great City Schools June 2014

Introduction

In early 2014, Dr. Lewis Ferebee, Superintendent of the Indianapolis Public Schools (IPS), requested that the Council of the Great City Schools (CGCS) provide a high-level management review of the district's budget and financial operations. Specifically the Council was requested to —

- Substantiate or refute the General Fund budgeted and actual results for 2013 and the conclusions related to the district's budgeting and reporting practices, as reported by the superintendent in his public presentation on March 11, 2014.
- ➤ Review and evaluate the leadership, management, organization, and operations of the district's business and finance department.
- ➤ Review and comment on the adequacy of the district's financial policies, including its reserving policies.
- > Review and appraise the district's financial reporting structure, including its new quarterly financial report.
- ➤ Develop recommendations that would help the district's budget and finance functions achieve greater operational efficiency and effectiveness.

In response to this request, the Council assembled a Strategic Support Team (the team) of senior managers with extensive experience in budget and financial operations in other major urban school systems across the country. The team was composed of the following individuals. (Attachment A contains brief biographical sketches of team members.)

Bob Carlson, Project Director Director, Management Services Council of the Great City Schools

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¹ The Council has conducted about 250 instructional, management, and operational reviews in over 50 bigcity school districts over the last 15 years. The reports generated by these reviews are often critical, but they also have been the foundation for improving the operations, organization, instruction, and management of many urban school systems nationally. In other cases, the reports are complimentary and form the basis for identifying "best practices" for other urban school systems to replicate. (Attachment E lists the reviews that the Council has conducted.)

David Koch, Principal Investigator Chief Administrative Officer (Retired) Los Angeles Unified School District

Chuck Burbridge Chief Financial Officer Atlanta Public Schools

Kenneth Gotsch Assistant Superintendent for Business & Finance Seattle Public Schools

Judith M. Marte Deputy Chief Financial Officer Miami-Dade County Public Schools

José Montes de Oca Chief Auditor Miami-Dade County Public Schools

The team conducted its fieldwork for the project during a five-day site visit to Indianapolis between April 28 and May 2, 2014. The general schedule for the site visit is described below. (The Working Agenda for the site visit is shown in Attachment B.)

The team met with the Superintendent on the first day of the site visit to discuss his expectations and objectives for the review and to make last-minute adjustments to the work schedule. The team used the subsequent three full days of the site visit to conduct interviews with staff members and others (a list of individuals interviewed is shown in Attachment C) and to review documents, reports, and data provided by the district (a list of documents reviewed by the team is shown in Attachment D). The final day of the visit was devoted to synthesizing and refining the team's preliminary findings and recommendations, and to debriefing the Superintendent.

The Council sent a draft of this document to team members for their review to ensure the accuracy of the report and to obtain their concurrence with the final recommendations. This management letter contains the findings and recommendations that were designed by the team to help improve the operational efficiency and effectiveness of the district's budgeting and financial reporting.

Findings and Observations

The findings and observations of the Council's Strategic Support Team are organized around the following areas –

² The Council's peer reviews are based on interviews of staff and others, a review of documents provided by the district, observations of operations, and the team's professional judgment. In conducting the interviews, the teams must rely on the willingness of those interviewed to be factual and forthcoming, but cannot always judge the accuracy of statements made by interviewees.

Review of the Business and Finance Department of the Indianapolis Public Schools

- A. Validation of Superintendent's Presentation
- B. Strategic Issues
- C. Audit and Internal Controls
- D. Financial Policies and Practices
- E. Financial Reporting and Communications
- F. Organization and Staffing

These findings and observations are followed by recommendations in each area.

A. Validation of Superintendent's Presentation

• The team was able to substantiate the General Fund budgeted and actual results for 2013, as reported by the Superintendent in his March 11, 2014 presentation, by comparing those results to the official records and reports provided by the district³ and published reports from the Indiana Department of Education and Indiana State Bureau of Accounts websites. The budgeted and actual results are displayed in Exhibits 1 and 2 below.

Exhibit 1. 2013 Budgeted Deficit (Superintendent's Presentation of March 11, 2014)



Prepared by IPS

Exhibit 2. 2013 Actual Surplus (Superintendent's Presentation of March 11, 2014)



Prepared by IPS

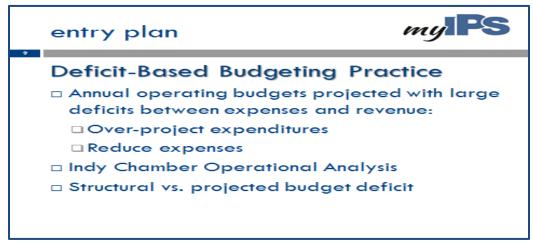
³ These records included the Indiana Department of Education, Office of School Finance, Calendar Financial Report and the Department of Local Government Finance Budget Estimator for Indianapolis Public School Corporation.

Council of the Great City Schools

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• The team confirmed the Superintendent's conclusion, as stated in his March 11, 2014 presentation, that the "annual operating budgets [were] projected with large deficits between expenses and revenue" (See Exhibit 3 below).

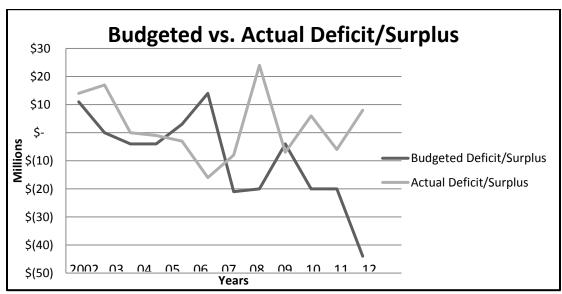
Exhibit 3. Deficit-Based Budgeting Practice (Superintendent's Presentation of March 11, 2014)



Prepared by IPS

The team found that variances between budgeted deficits or surpluses and actual results for the General Fund have occurred for a number of years; that these variances became more significant beginning in 2007; and that variances were particularly serious in the past three years. Exhibit 4 below displays a 12-year history of budgeted deficits or surpluses compared with actual results.

Exhibit 4. 12-Year History of Budgeted vs. Actual Results (General Fund)



Prepared by CGCS from information provided by IPS

The team was also able to confirm the Superintendent's conclusion that the district's General Fund budget over-projected expenditures. The team found that variances between budgeted and actual expenditures in the General Fund have occurred for a number of years; that these variances became more significant beginning with the 2009 budget; and that these spending gaps were particularly large in the past three years. Exhibit 5 below displays the 12-year history of budgeted and actual expenditures in the district's General Fund.

Budgeted Vs. Actual Expenditures \$340 \$320 \$300 \$280 Budget \$260 Actual \$240 \$220 \$200 2002 03 04 05 07 09 11 12 2013 06 80 10 Years

Exhibit 5. 12-Year History of Budgeted vs. Actual Expenditures (General Fund)

Prepared by CGCS from information provided by IPS

The Superintendent acknowledged the difference between a "structural budget deficit" (traditionally defined as on-going expenditures in excess of on-going revenues, without consideration of any beginning balance) *versus* an "operational deficit" (in which expenditures exceed both revenues and any beginning balance).

B. Strategic Issues

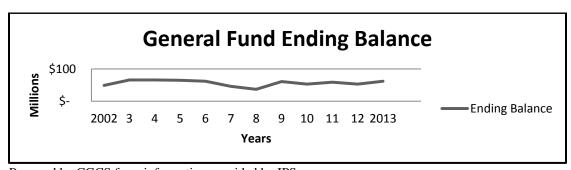
• District financial accounting and reporting is done on a Cash Basis⁴ and does not use Generally Accepted Accounting Principles (GAAP),⁵ which could result in significant unidentified and unreported liabilities. For example –

⁴ Under the Cash Basis of accounting, revenue is recorded when cash is received and expenses are recorded when they are paid. In contrast, the Accrual Basis of accounting records income when it is earned and records expenses when they are incurred, regardless of the flow of cash.

⁵ GAAP refers to the standard framework of guidelines for financial accounting and reporting. These include the standards, conventions, and rules that accountants follow in recording and summarizing and in the preparation of financial statements. The Accrual Basis of accounting and reporting is GAAP.

- The district may be subject to liabilities for the past service costs of retired employees (e.g., retiree pensions and health insurance benefits).
- The district may have unfunded obligations for its workers' compensation program.
- The district has not computed or disclosed the values of accumulated unused employee sick days and vacation balances.
- o Not all multi-year contractual obligations are fully encumbered.
- o The long-term obligations of the district's Self-Insurance Fund are not accrued or disclosed in any district accounting reports. Further, the team noted a decline in the ending cash balance in this fund (from \$8.4 million in 2008 to \$1.7 million in 2013), which could be indicative of an issue of the viability of the district's Self-Insurance Fund.
- The district prepares its annual budget on a calendar year basis (January 1 to December 31), which does not reflect the business cycle of a school system. Further, the bi-annual audits conducted by the State's Board of Accounts are reported on a fiscal year basis (July 1 to June 30), which makes it challenging to compare the district's annual budget, revenue, and expenditure reports with the State's audit results.
- The district has maintained significant balances in its General Fund over the past 12 years as shown in Exhibit 6 below. The average ending balance during this period was \$57 million, which is approximately 20 percent of average annual expenditures. For 2013, the ending balance in the General Fund was 25 percent of revenues, more than twice the median of 11 percent among 34 reporting CGCS districts.

Exhibit 6. 12-Year History of the General Fund Ending Balance



Prepared by CGCS from information provided by IPS

Council of the Great City Schools

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⁶ While the district has a substantial cash balance in its General Fund, this balance is non-recurring and should not be used to fund recurring operational expenditures. Also, this balance may be offset by undisclosed and unfunded liabilities since the district does not use GAAP accounting

⁷ Managing for Results in America's Great City Schools, 2013: A Report Of The Performance Measurement And Benchmarking Project, Council of the Great City Schools, October 2013

Review of the Business and Finance Department of the Indianapolis Public Schools

- The team saw no evidence that the district has conducted and reported a strategic analysis of the financial impact of charter schools on the district.
- The team saw no evidence that the district has conducted and reported a strategic analysis of the financial impact of its substantially underutilized facilities.

C. Audit and Internal Controls

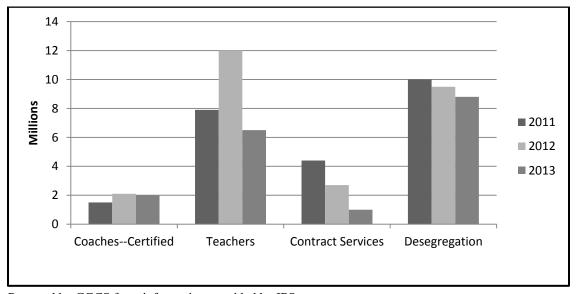
- IPS does not have an effective internal audit function. For example
 - The School Board does not have an Audit Committee.
 - There is no annual Audit Plan or risk assessment.
 - The person carrying the title of Internal Auditor reports to the Chief of Financial & Business rather than to a School Board-level audit committee.
 - The actual duties, responsibilities, and activities of the Internal Auditor are very limited in scope and typically do not entail auditing.
- The team noted a number of significant weaknesses in the district's internal controls. For example -
 - The Position Control system is managed by the Human Resources department, rather than by the Budget department (which means positions could be added that are not funded in the budget).
 - While school staffing formulas exist, the team was told that they are not adhered to in many situations.
 - The district's automated time and attendance system has not been implemented, resulting in an error-prone manual-input payroll-process (resulting in routine off-cycle payroll runs).
 - o The district payroll system allows the over-expenditure of salary appropriations.
 - There are apparently few controls over adjustments to non-salary budget allocations.
 - Accounts Receivable staff members do both the billing of receivables and the collection of cash receipts, thus violating the principle of separation of incompatible duties.
 - The Internal Auditor does the district's bank reconciliations, rather than the accounting department.

• The Accounts Receivable staff is performing the treasury function of directing cash investments.

D. Financial Policies and Practices

- The district has minimal financial policies. For example
 - Fiscal policies are inadequate and they do not cover key elements such as Reserves, the Rainy Day Fund, or the district's capital program.
 - The budget policy reviewed by the team was very limited and it appeared that staff was not following it.
 - o The investment policy lacks provisions for an investment committee or an investment advisor.
 - There are no debt policies.
- The Budget office does not do projections to validate the budgeted revenues and expenditures and the adopted budget is not adjusted for significant changes in revenue or appropriations.
- The district has an established pattern in recent years of significantly overprojected expenditures (as displayed in Exhibit 5 above: 12-History of Budgeted vs. Actual Expenditures). For example, Exhibit 7 below shows four major areas where budgets exceeded expenditures during the past three years. The chart shows the amount by which the budget exceeded the actual expenditures in each of the categories over each of the past three years.

Exhibit 7. Major Areas Where Budgets Exceeded Actual Expenditures (2011 to 2013, General Fund)



Prepared by CGCS from information provided by IPS

- The General Fund budget for expenditures is not aligned to anticipated State revenues.
- The district has allowed encroachment on the General Fund by other funds. For example –
 - The Food Service Fund does not fully pay its own utilities, custodial, supervisory personnel, equipment, or trash removal costs.
 - Warehouse costs are not fully recovered through a service charge to users on goods received, for storage and delivery.
- The Finance office invests millions of idle funds in short-term instruments and does not take advantage of its opportunities to make longer-term investments, which would likely generate greater yields.

E. Financial Reporting and Communications

- The district's financial reporting lacks transparency at virtually every level.
- The district has not produced an annual Budget Book for the School Board and public since 2010.
- The district's budget staff does not prepare annual budgets, School Board approval documents, or State reports for every major fund. To illustrate, Exhibit 8 below shows the funds for which budgets are reported and approved by the School Board and the State and those for which no budget forms are filed (except as may be related to specific grant approvals). It is estimated that the activity in these unreported funds amounts to \$126 million per year, which comprises over 20 percent of the district annual expenditures.

Exhibit 8. Funds For Which Budgets Are Approved By The School Board And Filed With The State And Those For Which No Budget Forms Are Filed.

Budget Filed With	h State	Budget Not Filed With	State
FUNDS	2014 Budget Amounts	FUNDS	Estimated Activity
Rainy Day	\$14.8	School Lunch (Est.)	\$17.5
General	263.7	School Technology	??
Debt Service	39.9	Self Insurance	??
Pension Debt	2.9	Student Activity	??
Referendum Debt	17.7	Retirement/Severance	??
Capital Projects	46.1	Alternative Education	??
Transportation	36.2	Special Purpose Funds	??
Bus Replacement	12.9		
TOTAL 2014 Budgets		Estimated	\$126.0

Prepared by CGCS from information provided by IPS

- A consolidated all-funds budget is not prepared or presented to the School Board and public. As a result, the activities and resources of some departments (such as the Information Technology department), which are spread through several different funds, are never viewed in their entirety.
- The annual budget information presented to the School Board for approval includes expenditure and revenue projections, but does not display beginning balances or projected ending balances.
- The new quarterly report being presented to the School Board contains no analysis or explanatory narratives nor does it contain projections of expenditure and revenue data through the end of the year, so they can be compared to the annual budgets.
- There are no monthly financial reports that compare budgets to actual outcomes.
- The monthly Treasurer's report contains no explanatory narratives or analysis.
- The district's web site posts little in the way of financial information or reports.

F. Organization and Staffing

- The team noted several areas in the Business and Finance organization that appeared to be understaffed. For example
 - o The internal audit unit is understaffed.
 - The purchasing staff is only able to bid about half of the district's goods and services because of limited staff resources.
 - The resources allotted to the Treasurer's functions are inadequate to maximize returns on investments or produce informative reports for the School Board and public.
- Staff duties, roles, responsibilities, and expectations are not clearly defined or understood.
- The team noted several shortcomings in the current Business and Finance department organization shown in Exhibit 9 below. For example
 - The Internal Auditor reports to the Chief of Financial & Business Services, rather than to a School Board-level audit committee (as noted earlier in this report).
 - o The Accounts Receivable Manager does not report to the Accounting Director.
 - o The Textbook Manager does not report to the Purchasing Director.

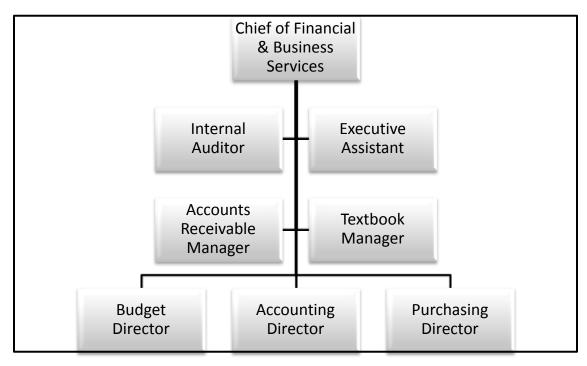


Exhibit 9. IPS Business and Finance Department

Prepared by CGCS basis on information provided by IPS

Recommendations

- 1. Implement Generally Accepted Accounting Principles (GAAP), including accrual accounting, and produce a Comprehensive Annual Financial Report (CAFR) that complies with the accounting requirements promulgated by the Governmental Accounting Standards Board (GASB).
- 2. Adopt a fiscal year of July 1 to June 30, as provided for in State law, 8 to coincide with the school system's business cycle and the fiscal year audits conducted by the State Board of Accounts.
- 3. Establish an Audit Committee composed of School Board members and community leaders with experience in accounting, finance, or auditing and empower them with the following responsibilities
 - a. Review and approve the Internal Auditor's annual work plan based on a risk assessment of district operations
 - b. Review and comment on all internal and external audit reports
 - c. Review and comment on all interim and annual financial reports.

⁸ Legislation enacted in 2008 enables Indiana school districts to adopt the fiscal year of July 1 to June 30.

- 4. Establish a direct reporting relationship of the Internal Auditor to the School Board's Audit Committee.
- 5. Strengthen the district's Internal Audit function by augmenting the office with additional experienced professional personnel.
- 6. Employ an outside independent firm (or the augmented Internal Audit unit) to conduct a comprehensive review and evaluation of the district's internal controls.
- 7. Adopt a thorough set of financial policies, 9 including but not limited to
 - a. Fiscal policies relating to reserves, ending balances, the capital program, and inter-fund cost allocations.
 - b. Budgeting policies, including calendars, allocation formulae, input processes, and projection methodologies.
 - c. Investment policies, including an investment committee and an investment advisor.
 - d. Debt policies, including the defined purposes for which debt may be issued, limitations on debt, type of approved debt, approval process and reporting.
- 8. Restructure the financial reporting system to provide greater transparency and better communications. Specifically
 - a. Prepare and publish a consolidated annual budget, which includes all funds and displays beginning balances, anticipated revenues, appropriated expenditures, and projected ending balances.
 - b. Prepare interim financial reports, on at least a quarterly basis, that compare the budgeted revenues and expenditures with actual year-to-date results, contain projections of revenues and expenditures for the remainder of the year, and display anticipated ending balances.
 - c. Produce a Comprehensive Annual Financial Report (CAFR) (as noted above).
 - d. Provide analyses and narratives in all financial reports to enhance their value as a communication tool and improve transparency.
 - e. Post all regular and special financial reports on the district's web site.
- 9. Conduct a strategic analysis of the financial impact of charter schools on the district.
- 10. Conduct a strategic analysis of the financial impact of underutilized facilities.

⁹ A sample of financial policies is contained in the Government Finance Officers Association (GFOA) publication titled "Preparing High Quality Budget Documents for School Districts" by John Fishbein.

Review of the Business and Finance Department of the Indianapolis Public Schools

- 11. Reorganize the Business and Finance Department on a functional basis to better align budgeting, accounting, and procurement activities.
- 12. Clearly define duties and responsibilities for the various positions within the Business and Finance Department and augment staffing where needed to meet departmental objectives and responsibilities.

ATTACHMENT A. STRATEGIC SUPPORT TEAM

Robert Carlson

Robert Carlson is Director of Management Services for the Council of the Great City Schools. In that capacity, he provides Strategic Support Teams and manages operational reviews for superintendents and senior managers; convenes annual meetings of Chief Financial Officers, Chief Operating Officers, Human Resources Directors, and Chief Information Officers and Technology Directors; fields hundreds of requests for management information; and has developed and maintains a Web-based management library. Prior to joining the Council, Dr. Carlson was an executive assistant in the Office of the Superintendent of the District of Columbia Public Schools. He holds Ed. D. and M.A. degrees in administration from The Catholic University of America; a B.A. degree in political science from Ohio Wesleyan University; and has done advanced graduate work in political science at Syracuse University and the State Universities of New York.

David W. Koch, CPA

David Koch is the former Chief Administrative Officer for the Los Angeles Unified School District (LAUSD). The LAUSD is the nation's second largest public school system. Mr. Koch's responsibilities encompassed virtually all non-instructional operations of the district, including finance, facilities, information technology, and all of the business functions (including transportation, food service, risk management, and procurement). Mr. Koch also served the LAUSD as Business Manager, Executive Director of Information Services, and Deputy Controller. Mr. Koch was also Business Manager for the Kansas City, Missouri Public School District and was with Arthur Young and Company prior to entering public service. He is a graduate of the University of Missouri and a Certified Public Accountant in the states of California, Missouri, and Kansas. A resident of Long Beach, California, Mr. Koch provides consulting services to public sector clients and companies doing business with public sector agencies.

Chuck Burbridge

Chuck Burbridge is the Chief Financial Officer of Atlanta Public Schools. Before moving to the Atlanta Public Schools, Mr. Burbridge was the Chief Financial Officer for the Los Angeles Unified School District (LAUSD) starting April 2005 and Deputy Chief Financial Officer beginning in June 2003. He has 25 years of experience in state and local government, providing solutions and leadership in finance and technology. Mr. Burbridge also served nearly three years as the Director of the Public Sector, Management Assurance Services practice of KPMG LLP in the Midwest. In addition, during five years of service as Deputy Chief Fiscal Officer of the Chicago Public Schools, he performed a variety of functions, including Treasurer, Director of Management Information Services, and Director of Internal Audit Services. Mr. Burbridge has also served as Deputy Chief Financial Officer, Budget Director and Revenue Director at Cook County (IL) and as Chief Economist for the Illinois General Assembly. He holds a Masters in Economics from the University of Illinois, Springfield

Kenneth Gotsch

Kenneth Gotsch is the Assistant Superintendent of Business & Finance for the Seattle Public Schools. Mr. Gotsch was formerly the Vice Chancellor of Finance/CFO for the City Colleges of Chicago. Mr. Gotsch was also the Chief Financial Officer of the Los Angeles Unified School District, the nation's second largest school system. In that capacity, he was responsible for administrative oversight of the district's accounting, disbursements, budget services, financial planning, and school fiscal services. Mr. Gotsch was also the Chief Fiscal Officer of the Chicago Public Schools, the nation's third largest school system. Before taking that position in 1995, he served as both the Deputy Director of the Department of Revenue's Tax Administration and the Manager of Information Services for the City of Chicago. Prior to joining city government, he received his Master of Arts degree in Public Finance from the University of Chicago's Irving Harris Graduate School of Public Policy and a Bachelor of Science degree in Business Administration and Finance from Marquette University

Judith M. Marte

Judith M. Marte is the Deputy Chief Financial Officer for the Miami Dade Public Schools, the fourth largest school system in the nation. Prior to relocating with her family to Miami thirteen years ago, Ms. Marte was the Executive Director, Business Services for the Lawrence Public Schools in Massachusetts where she was responsible for all Finance functions, technology, food services, student transportation, custodial services, facilities development and school safety. Ms. Marte began her career at a large CPA firm in Boston where she worked in auditing and consulting services. She received her MBA from University of New Hampshire and her Bachelor of Science in Business Administration (Accounting) from Merrimack College. Ms. Marte completed, with Achievement, the first Council of Great City School Executive Education Program in 2012 and now acts as a mentor to incoming participants.

José F. Montes de Oca, CPA

José F. Montes de Oca is the Chief Auditor of the Office of Management and Compliance Audits of Miami-Dade Public Schools, the nation's fourth largest school system. He holds a Bachelor's degree in accounting from Florida State University and became a Certified Public Accountant in the State of Florida in 1982. Before joining M-DCPS in 1980 Mr. Montes de Oca worked for the State of Florida Auditor General as a field auditor and Florida International University as an internal auditor.

SUBCOMMITTEE ON MEMBERSHIP

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on Membership

2014-2015

Subcommittee Goal

To review criteria and applications for membership, and recruit and retain members.

Chair

Pam Knowles, Portland School Board

Members

Cecilia Adams, Toledo School Board
JoAnn Brannon, Nashville School Board
Terry Grier, Houston Superintendent
Heath Morrison, Charlotte-Mecklenburg Superintendent
Shanaysha Sauls, Baltimore School Board
Valeria Silva, St. Paul Superintendent
Craig Witherspoon, Birmingham Superintendent

Ex Officio

Jumoke Hinton Hodge, Oakland School Board

COUNCIL OF THE GREAT CITY SCHOOLS

Membership by Region October 1, 2014

East (E)	Midwest (MW)	Southeast (SE)	West (W)
Boston	Austin	Atlanta	Albuquerque
Bridgeport	Chicago	Baltimore	Anchorage
Buffalo	Dallas	Baton Rouge	Fresno
Cincinnati	Denver	Birmingham	Hawaii
Cleveland	Des Moines	Broward County	Las Vegas
Columbus	El Paso	Charleston	Long Beach
Dayton	Ft. Worth	Charlotte	Los Angeles
Detroit	Houston	Greensboro	Oakland
Newark	Indianapolis	Jackson	Portland
New York City	Kansas City	Jacksonville	Sacramento
Philadelphia	Milwaukee	Louisville	San Francisco
Pittsburgh	Minneapolis	Memphis-Shelby Cty	Seattle
Providence	Oklahoma City	Miami-Dade County	San Diego
Rochester	Omaha	Nashville	Santa Ana
Toledo	St. Louis	New Orleans	
	St. Paul	Norfolk	
	Wichita	Orlando	
		Richmond	
		Palm Beach	
		Tampa	
		Washington	
15	17	21	14

LETTER OF INTEREST FROM DURHAM PUBLIC SCHOOLS



September 25, 2014

Michael Casserly, Executive Director Council of the Great City Schools 1301 Pennsylvania Ave., NW Suite 702 Washington, DC 20004



Dear Mr. Casserly:

Durham Public Schools is excited to apply for membership in the Council of the Great City Schools and add our voice to the public school districts fighting for educational opportunity and attainment for our nation's urban students.

We serve the children of the City of Durham and Durham County, North Carolina. The former county and city school districts merged in 1992 to become Durham Public Schools. While our county's perimeter is rural, the heart of Durham Public Schools is urban. In 2013-14 our student population of 33,311 was 49.56 percent African-American, 25.24 percent Hispanic/Latino, 18.90 percent White, 3.24 percent multiracial, 2.45 percent Asian and the remainder Native American or Hawaiian/Pacific Islander. Almost 65 percent of our students received free or reduced-price lunch. The City of Durham's population was 242,810 in January 2014, with approximately 40,000 more residents in the outlying county.

DPS's graduation rate in 2014 rose for a sixth consecutive straight year to 81.5 percent. Three of our specialty high schools celebrated 100-percent graduation rates. We offer innovative magnet programs across our district and partner with higher education to offer early college opportunities. Our Universal Free Breakfast program feeds every child at every school, and out of 25 North Carolina schools to win National Healthy School Awards from the Alliance for a Healthier Generation, 12 came from Durham Public Schools. Along with our accomplishments, however, we recognize that we still have a distance to travel to become the school district our students and community deserve. We face achievement gaps and performance shortcomings common to many urban districts which we are determined to rectify.

We feel we have much to share with and learn from our fellow urban districts in the Council of the Great City Schools. We look forward to taking advantage of the research, professional development and consulting services available to Council members and to being a part of the national conversation that will uplift all of our urban schools, including Durham Public Schools.

Sincerely,

Heidi Carter, Chair

Heidi Carter

Durham Public Schools Board of Education

Bert L'Homme, Ph.D., Superintendent

Durham Public Schools

Key Statistics on Durham, NC

	Council Bylaws Criteria	Durham Public Schools
Population of city	250,000	242,810
School district enrollment	35,000	33,311
Free/reduced price lunch	Urban characteristics	65.0%
Percent African American	Urban characteristics	49.6%
Percent Hispanic	Urban characteristics	25.2%

SUBCOMMITTEE ON BY-LAWS

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on By-Laws

2014-2015

Subcommittee Goal

To define the mission, responsibilities and composition of the Council's structural components within the framework of applicable laws and regulations.

Chair

Kaya Henderson, District of Columbia Chancellor

Members

Jose Banda, Sacramento Superintendent Meria Carstarphen, Atlanta Superintendent Larry Feldman, Miami-Dade County School Board Eric Gordon, Cleveland CEO Michael O'Neill, Boston School Committee Airick West, Kansas City School Board Paula Wright, Duval County School Board

Ex Officio

Jumoke Hinton Hodge, Oakland School Board

CURRENT BY-LAWS

BY-LAWS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

ARTICLE I: NAME

Section 1.01 Name. The Corporation shall be organized as non-profit and be known as the Council of the Great City Schools.

ARTICLE II: PURPOSE AND MISSION

Section 2.01 Purpose. The purpose of this Corporation shall be to represent the needs, challenges, and successes of major-city public school districts and their students before the American people and their elected and appointed representatives; and to promote the improvement of public education in these districts through advocacy, research, communications, conferences, technical assistance, and other activities that may also benefit other schools, school districts and students across the country.

Section 2.02 <u>Mission</u>. The Council of the Great City Schools, being the primary advocate for public urban education in America, shall:

- Articulate the positive attributes, needs and aspirations of urban children and youth;
- Promote public policy to ensure improvement of education and equity in the delivery of comprehensive educational programs;
- Provide the forum for urban educators and board members to develop strategies, to exchange ideas and information and to conduct research; and
- Create a national focus for urban education in cooperation with other organizations and agencies.

to ensure that the members of the Great City Schools meet the needs of the diverse urban populations they serve.

ARTICLE III: OFFICES

Section 3.01 Principal Office. The principal office of the Corporation shall be at 1301 Pennsylvania Avenue, Northwest, Suite 702, Washington, D.C. The location of the registered office of the Corporation shall be in the offices of the Corporation Trust System in Chicago, Illinois at 228 South LaSalle Street, Chicago, Illinois.

The Registered Agent of the Corporation shall be the Corporation Trust System in Chicago, Illinois and Washington, D.C.

ARTICLE IV: MEMBERSHIP

Section 4.01 Membership. A Board, Committee or Commission (hereafter referred to as "Board of Education") responsible for public education in cities with a population of two hundred fifty thousand (250,000) or more, and an enrollment in public elementary and secondary schools of thirty five thousand (35,000) or more in 1980 or which is the predominant Board of Education serving the largest urban city of each state regardless of the enrollment of the school district. If the Board of Education has jurisdiction over areas outside

the central city, then the enrollment of those areas may also be included for purposes of eligibility, but the population outside the central city shall not.

Provided the above criteria are met, the Executive Committee will examine the urban characteristics of each applicant city brought to it by the membership committee prior to submitting a recommendation for membership to the Board of Directors for final approval.

Such urban characteristics may include: children eligible for Title I of the Elementary and Secondary Education Act; children in families qualifying for T.A.N.F.; children who are English language learners; and children who are African American, Hispanic, Asian American, Native American, Alaskan Native or other racial minorities as classified by federal Civil Rights statutes.

The enrollment of school districts for purposes of membership in the organization shall be based on the official district enrollment reported to the state, however calculated.

A Board of Education may retain its membership by meeting its dues-paying obligations without regard to changes in population or enrollment. To remain in good standing, dues must be paid.

A district that has not paid its dues will be notified after one year of nonpayment that it will not receive services from the organization in the subsequent year. A district will be dropped from membership after two consecutive years of non-payment of dues and will be required to reapply for membership should it wish to rejoin the organization. The Executive Committee retains the right to levy a "reinstatement fee" in an amount the committee will determine as a condition of a district's rejoining the organization after its membership has otherwise lapsed or to waive such fees depending on the circumstances of the district. The Committee will annually review the status of all district dues and make determinations for needed action.

Section 4.02 Participation of Non-Member Cities. Non-member districts may, on approval of the Executive Committee, be involved in studies or other projects of the Council of the Great City Schools. Conditions for such participation shall be established by the Executive Committee.

Section 4.03 Participation of Former Board of Directors Members. Former members of the Board of Directors may be involved as non-voting members at conferences and may receive publications of the organization under conditions established by the Executive Committee.

Section 4.04 <u>Colleges of Education</u>. Colleges of Education located in or serving cities that are members of the Council of the Great City Schools may be represented *ex officio* on the Executive Committee and Board of Directors and may meet and confer with the Council on issues of joint concern as necessary.

ARTICLE V: ORGANIZATION AND ELECTIONS

Section 5.01 Board of Directors. The affairs of the Corporation shall be operated by the Board of Directors. Members of the Board of Directors are the officers of the corporation and the Superintendent of Schools and a member of the Board of Education officially designated by each Board of Education and the Chair of the Great City Colleges of Education. Each member of the Board of Directors shall vote as an individual. No proxies may be appointed to the Board of Directors for the purposes of constituting a quorum of the Board of Directors

or for purposes of voting on matters coming before the Board of Directors. A member of the Board of Directors who is unable to attend a board meeting may, in writing, addressed to the Chair, appoint a representative to attend such meeting for the sole purpose of reporting back to the board member on the business of the meeting.

Section 5.02 Officers.

- (a) Elected Officers. The elected officers of the Corporation shall be the Chair, Chair-Elect, and Secretary/Treasurer. No person shall be elected to the same position for more than two successive years. The officers shall be elected annually by the Board of Directors from persons who have served on the Executive Committee. Officers and shall take office on the 1st of July following their election. If an officer is unable to complete a term, the Board of Directors shall fill the vacancy at the next meeting of the Directors. The Office of the Chair shall alternate generally between superintendents and Board of Education members. Where the Chair or Chair-Elect is a Board of Education member, he or she may continue to be Chair, or Chair-Elect and then Chair, as the case may be, even though he or she is no longer the designated Board of Education member for his or her school district; provided, however, that only the designated Board of Education member from his or her district shall be entitled to vote at Board of Directors meetings.
- **(b) Non-Elected Officers.** The immediate past Chair shall serve as a non-elected, but voting officer of the Corporation. The Executive Director shall serve as a non-elected and non-voting officer of the Corporation.

Section 5.03 Executive Committee

- (a) Voting Members. The voting members of the Executive Committee shall consist of the Chair, Chair-Elect, Secretary/Treasurer, Immediate Past Chair, and twenty (20) persons elected by the Board of Directors. The Executive Committee shall be elected by the Directors at the Annual Meetings of the membership on a staggered basis for terms of three years and shall take office on the 1st of July following their election. The maximum consecutive number of years that a member of the Board of Directors can serve on the Executive Committee shall be limited to the total of (i) the balance of an unexpired term to which, pursuant to subsection 5.03(e), he or she is appointed by the Executive Committee and is then elected by the Board of Directors; (ii) two three-year terms; and (iii) any additional consecutive years during which he or she serves as an officer of the Corporation.
- (b) **Proxies.** No proxies may be appointed to the Executive Committee for purposes of constituting a quorum of the Executive Committee or for purposes of voting on matters to come before the Executive Committee. A member of the Executive Committee who is unable to attend a committee meeting may in writing, addressed to the Chair, appoint a representative to attend such meeting for the sole purpose of reporting back to the committee member on the business of the meeting.
- (c) Composition. The Executive Committee and Officers of the Corporation shall have equal proportion of Superintendents and Board of Education Members; shall include geographic representation, race, gender, ethnicity, and attendance at Board of

Directors meetings as criteria for membership on the Executive Committee and for Officers of the Corporation. Attendance at Executive Committee meetings will be a criterion for renomination to the Executive Committee and for Officers of the Corporation. Failure to attend both the summer and winter meetings of the Executive Committee in any single calendar year may result in a member's replacement. No more than one person from each member district shall be nominated to the Executive Committee. In addition, the Chair of the Great City Colleges of Education shall serve as an *Ex Officio* non-voting member of the Executive Committee.

- (d) Responsibilities and Powers of the Executive Committee. Except as to matters for which the General Not For Profit Corporation Act of 1986 of the State of Illinois, as amended from time to time, requires the approval of the members and to the extent not otherwise limited in these By-Laws and by resolution from time to time adopted by the Board of Directors, the Executive Committee shall have and may exercise all the authority of the Board of Directors, when the Board of Directors is not in session. The Executive Committee shall have power to authorize the seal of the Corporation to be affixed to all papers where required. Copies of the recorded minutes of the Executive Committee shall be transmitted to the Board of Directors. The Executive Committee shall have the power to contract with and fix compensation for such employees and agents as the Executive Committee may deem necessary for the transaction of the business of the Corporation, including but not limited to the Executive Director who shall serve as Assistant Secretary/Treasurer and disbursing agent of the Corporation. All salary rates shall be approved annually by a vote of the Executive Committee.
- **(e) Vacancies.** Between meetings of the Board of Directors, the Executive Committee shall have and exercise the authority to fill vacancies on the Executive Committee on a temporary basis and to declare a vacancy on the Executive Committee if a member shall be unable to attend meetings of the Committee, or should no longer hold a Superintendency or be a member of a Board of Education in the membership. Appointments to such vacancies shall be confirmed by the Board of Directors at their next regular meeting.
- **(f) Subcommittees of the Executive Committee.** There shall be three subcommittees of the Executive Committee: Audit, By-Laws, and Membership. These Committees and their chairpersons will be appointed by the Executive Committee upon the recommendations of the Chair.

Section 5.04 <u>Task Forces of the Board of Directors</u>. The Board of Directors may from time to time create Task Forces to address critical issues facing urban public education. A Chair and Co-Chair of each Task Force shall be appointed by the Chair of the Board and shall include one Superintendent and one School Board member, and may also include a representative of the Great City Colleges of Education. The mission, goals, products, and continuation of each Task Force shall be subject to annual review and concurrence by the Board of Directors. Recommendations of the Task Forces shall be posted and circulated to the Board of Directors within a reasonable time before its meetings in order to be considered.

Section 5.05 Nominations Committee.

(a) Composition. A Nominations Committee shall be chosen annually by the Chair to nominate officers and members of the Executive Committee. In order to ensure racial, ethnic and gender representation on all committees and subcommittees, the Chair shall use these criteria in establishing the Nominations Committee and all other committees and subcommittees. The Nominations Committee shall consist of the Immediate Past Chair of the Organization, who shall act as Chair of the Committee, and at least four other persons appointed by the Chair. The elected officers of the Corporation shall not serve on the Nominations Committee.

A majority of the members of the Nominations Committee shall be members of the Board of Directors who do not serve on the Executive Committee. The Nominations Committee shall have, to the extent possible, an equal number of Superintendents and Board of Education members, and in addition to being geographically representative, shall be balanced by race, ethnicity and gender.

(b) Responsibilities and Procedures. The Nominations Committee shall announce nominations at least 14 days before the date of the Board of Directors meeting at which such election will occur. Additional nominations may be made by written petition submitted to the Chairperson of the Nominations Committee at least 24 hours in advance of the start of the Business Meeting at which the election will take place. A written petition must have at least five written signatures from five Board of Directors members from at least five different member cities.

ARTICLE VI: EXECUTIVE DIRECTOR

Section 6.01 <u>Duties and Responsibilities</u>. An Executive Director shall be employed by the Executive Committee. In general, the responsibilities of the Executive Director shall be to organize and to coordinate the activities that form the basic program of the Corporation. The Executive Director shall function as the Chief Administrative Officer of the Corporation in accordance with policies established by the Executive Committee. The Executive Director shall be responsible for executing contracts in the name of the Corporation. The Executive Director shall serve as Assistant Secretary/Treasurer and disbursing agent of the Corporation.

Section 6.02 <u>Fidelity Bond</u>. The Executive Director shall be responsible for the acquisition and maintenance of a fidelity bond for all corporate officers and employees.

ARTICLE VII: CONFERENCE MEETINGS

Section 7.01 <u>Conferences.</u> The Board of Directors shall provide for at least one conference annually at which its members and staff shall meet to plan, discuss and hear reports of the organization. These meetings shall be determined and planned by the Executive Committee. The Conference may recommend to the Board of Directors problems and items for the Corporation's consideration.

Section 7.02 <u>Time and Place of Meetings</u>. Meetings of the Board of Directors and/or the Executive Committee shall be held at the call of the Chair, a majority of the Executive Committee, or one-third of the Board of Directors, and shall be held in the city of the registered office of the Corporation, or in member cities. The Board of Directors shall meet at least twice annually, once in the spring and once in the fall.

Section 7.03 <u>Spring Directors Meeting</u>. The spring meeting of the Board of Directors shall be held to elect officers, approve the annual budget, and transact such other matters of business as are necessary.

Section 7.04 <u>Notices of Meetings</u>. Written notices of the meetings of the Board of Directors and the Executive Committee shall be given at least fourteen (14) days prior to the date of the meeting.

Section 7.05 Quorum. The presence of one-third of the Board of Directors or a majority of elected Executive Committee members, respectively, shall constitute a quorum for the transaction of business, and unless otherwise provided in these By-Laws or by law, the act of a majority of The Board of Directors present or the act of a majority of elected Executive Committee members present at a meeting at which a quorum is present shall be an act of the Corporation.

Section 7.06 <u>Organization</u>. At every meeting of the Executive Committee, the Chair of the Board of Directors shall act as Chair. The Chair-Elect of the Board or other person designated by the Chair may chair the Executive Committee when the Chair is absent. The Executive Director or his or her designee shall serve as the Recording Secretary at all meetings of the Executive Committee and the Board of Directors.

Section 7.07 <u>Press Policy</u>. All meetings of the Corporation shall be open to the press and to the public. The Board of Directors or the Executive Committee, however, may by a majority vote declare a meeting closed.

ARTICLE VIII: FISCAL YEAR

Section 8.01 <u>Fiscal Year</u>. The fiscal year of the Corporation shall be from July 1st of each year to June 30th of the succeeding year.

Section 8.02 <u>Audit</u>. The accounts of the Corporation for each fiscal year shall be audited, and the financial reports verified annually by the Audit Committee of the Executive Committee. A written report of the Audit Committee shall be filed in the minutes of the meeting of the Corporation at which the report is submitted.

Section 8.03 <u>Bond.</u> The Officers and employees responsible for handling funds for the organization shall be bonded in an amount to be determined by the Executive Committee and premium shall be paid by the Corporation.

ARTICLE IX: FINANCES

Section 9.01 <u>Financial Support.</u> The Board of Directors shall determine the amount of the service charges and/or membership dues to be paid to the Corporation by Boards of Education in the membership. The Executive Committee shall review the membership dues structure and amounts in years ending in zero or five, and may recommend modifications to the Board of Directors.

Section 9.02 <u>Grants.</u> The Board of Directors shall be empowered to receive grants from foundations or other sources tendered to the Corporation.

Section 9.03 Receipts. All funds received are to be acknowledged by the Executive Director or his or her designee, and a monthly financial report is to be created internally for

management purposes and quarterly financial reports are to be submitted to the Executive Committee. Earmarked funds are to be carried in a separate account.

Section 9.04 Checks, Drafts, and Order for Payment of Money. Orders for payment of money shall be signed in the name of the corporation by such officers or agents as the Executive Committee shall from time to time designate for that purpose. The Executive Committee shall have the power to designate the officers and agents who shall have authority to execute any instruments on behalf of the Corporation.

Section 9.05 <u>Disbursements</u>. Checks written for amounts not exceeding \$100,000 shall be signed by the Executive Director or other persons authorized by the Executive Committee. Checks written in excess of \$100,000 shall be countersigned by the Executive Director and an officer.

Section 9.06 Contracts and Conveyances. When the execution of any contract or conveyance has been authorized by the Executive Committee, the Executive Director shall execute the same in the name and on behalf of the Corporation and may affix the corporate seal thereto.

Section 9.07 Borrowing. The Executive Committee shall have the full power and authority to borrow money whenever in the discretion of the Executive Committee the exercise of said power is required in the general interest of the Corporation. In such case, the Executive Committee may authorize the proper officers of the Corporation to make, execute and deliver in the name and on behalf of the Corporation such notes, bonds, and other evidence of indebtedness as the Executive Committee shall deem proper. No pledge or mortgage of the personal or real property of the Corporation is authorized unless by a resolution of the Board of Directors.

ARTICLE X: MISCELLANEOUS

Section 10.01 <u>Amendments</u>. These By-Laws may be altered, amended, or repealed, and new By-Laws may be adopted by a vote of a majority of the Board of Directors at any meeting for which there has been written notification fourteen (14) days prior to the meeting at which the By-Laws are proposed to be amended.

Section 10.02 <u>Rules of Order.</u> The parliamentary procedures governing meetings of the Board of Directors and the meetings of its committees and subcommittees shall to the extent not otherwise covered by these By-Laws, be those set out in the most current edition of *Robert's Rules of Order*.

APPROVED

April 19, 1961 Chicago, Illinois

REVISED

A 11.22 10.61	DI'I 111' D 1 '
April 23, 1961	Philadelphia, Pennsylvania
March 25, 1962	Chicago, Illinois
November 4, 1962	Detroit, Michigan
April 12, 1964	Chicago, Illinois
November 20, 1964	Milwaukee, Wisconsin
March 20, 1966	Chicago, Illinois
April 9, 1967	Chicago, Illinois
November 10, 1967	Cleveland, Ohio
May 4, 1968	Boston, Massachusetts
December 7, 1968	Philadelphia, Pennsylvania
March 29, 1969	San Diego, California
May 9, 1970	Buffalo, New York
May 8, 1971	San Francisco, California
November 16, 1972	Houston, Texas
March 21, 1974	Washington, D.C.
October 18, 1974	Denver, Colorado
May 21, 1975	Washington, D.C.
November 21, 1976	Chicago, Illinois
May 20, 1979	Los Angeles, California
November 4, 1979	New York City, New York
May 21, 1983	Philadelphia, Pennsylvania
March 18, 1984	Washington, D.C.
March 8, 1987	Washington, D.C.
March 11, 1989	Washington, D.C.
November 9, 1990	Boston, Massachusetts
Revised- March 17, 1991	Washington, D.C.
March 15, 1992	Washington, D.C.
October 30, 1992	Milwaukee, Wisconsin
March 14, 1993	Washington, D.C.
October 29, 1993	Houston, Texas
July 8, 1995	San Francisco, California
March 21, 1999	Washington, D.C.
October 14, 1999	Dayton, Ohio
March 18, 2001	Washington, D.C.
March 12, 2005	Washington, D.C.
July 29, 2005	Portland, Oregon
March 16, 2008	Washington, D.C.
October 21, 2010	Tampa, Florida
October 26, 2011	Boston, Massachusetts
November 2, 2013	Albuquerque, New Mexico

SUBCOMMITTEE ON AUDIT

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on Audit

2014-2015

Subcommittee Goal

To review and report on Council budgetary matters, and ensure the proper management of Council revenues.

Chair

Felton Williams, Long Beach School Board

Members

Richard Carranza, San Francisco Superintendent John Deasy, Los Angeles Superintendent Michael Hanson, Fresno Superintendent Bill Isler, Pittsburgh School Board Keith Oliveira, Providence School Board

Ex Officio

Jumoke Hinton Hodge, Oakland School Board

2013-2014 BUDGET

COMBINED REPORT GENERAL OPERATIONS AND CATEGORICAL PROGRAMS

ESTIMATED TOTALS
FOR
FISCAL YEAR 2013-2014

ENDING JUNE 30, 2014

THE COUNCIL OF THE GREAT CITY SCHOOLS PRELIMINARY REVENUE AND EXPENSE REPORT FOR FY13-14

COMBINED GENERAL OPERATIONS AND CATEGORICAL PROGRAMS

REVENUE	C	GENERAL PERATIONS FY13-14			CATEGORICAL PROGRAMS FY13-14		-	PRELIMINARY COMBINED TOTAL	
MEMBERSHIP DUES GRANTS AND CONTRACTS SPONSOR CONTRIBUTION REGISTRATION FEES INTEREST AND DIVIDENDS ROYALTIES AND OTHER INCOME	\$ \$ \$ \$ \$ \$ \$	2,545,576.50 - 10,000.00 - 223,310.03 361.23	97 97 97	5 5 5 5	13,500.00 4,139,272.00 842,710.00 407,561.00 773.14 50,096.73		\$ \$ \$ \$	2,559,076.50 4,139,272.00 852,710.00 407,561.00 224,083.17 50,457.96	
TOTAL REVENUE	\$	2,779,247.76	9	5	5,453,912.87		\$	8,233,160.63	
EXPENSES									
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL & MEETINGS GENERAL SUPPLIES SUBSCRIPTION & PUBLICATIONS COPYING & PRINTING OUTSIDE SERVICES TELEPHONE POSTAGE & SHIPPING EQUPT LEASE MAINT & DEP OFFICE RENT & UTILITIES UNCOLLECTED REVENUE EXPENSES ALLOCATED TO PROJECTS	***	1,888,545.98 17,336.10 54,850.44 21,605.04 17,916.57 129,927.51 369,700.43 39,796.54 5,983.40 14,138.82 272,638.62 70,000.00 (476,629.06)	97 97 97 97 97 97 97 97 97 97		1,110,872.43 - 991,713.57 - 5,780.02 52,445.23 1,100,028.55 4,041.65 11,697.37 - - 476,629.05		\$\$\$\$\$\$\$\$\$\$\$\$\$\$	2,999,418.41 17,336.10 1,046,564.01 21,605.04 23,696.59 182,372.74 1,469,728.98 43,838.19 17,680.77 14,138.82 272,638.62 70,000.00 (0.01)	
TOTAL OPERATING EXPENSES	\$	2,425,810.39	9	5	3,753,207.87		\$	6,179,018.26	
REVENUE OVER EXPENSES	\$	353,437.37	9	5	1,700,705.00		\$	2,054,142.37	
ADJUSTMENTS: NET ASSETS, BEGINNING OF YEAR NET GAIN/(LOSS) ON INVESTMENT PROJECTS IN-KIND CONTRIBUTION COMPLETED PROJECTS	\$ \$ \$	4,144,181.77 2,701.00 (153,207.95) 200,000.00	97 97	6	3,621,052.48 - 153,207.95 (200,000.00)		\$ \$ \$	7,765,234.25 2,701.00 - -	
NET ASSETS, END OF YEAR	\$	4,547,112.20	9	5	5,274,965.42		\$	9,822,077.62	

GENERAL OPERATIONS BUDGET REPORT

ESTIMATED TOTALS FOR FISCAL YEAR 2013-2014

ENDING JUNE 30, 2014

COUNCIL OF THE GREAT CITY SCHOOLS FY 2013-14 Membership Dues

STATUS OF MEMBERSHIP DUES AS OF June 30, 2014

			Date Rec'd		Date Rec'd		Date Rec'd		Date Rec'd	
DISTRICT	NOT PAID	PAID	FY13-14		FY12-13		FY11-12		FY10-11	
1 Albuquerque		\$41,281	7/22/2013		6/19/2012	***	6/21/2011	***	5/18/2010	***
2 Anchorage		\$36,123	7/2/2013		6/14/2012	***	7/7/2011		6/8/2010	***
3 Atlanta		\$36,123	7/16/2013		6/15/2012	***	5/25/2011	***	6/18/2010	***
4 Austin		\$41,281	6/11/2013	***	6/14/2012	***	5/25/2011	***	5/20/2010	***
5 Baltimore		\$41,281	8/13/2013		7/18/2012		7/11/2011		8/25/2010	
6 Birmingham		\$36,123	5/30/2013	***	2/27/2013		6/16/2011	***	12/1/2010	
7 Boston		\$41,281	8/7/2013	***	8/24/2012	***	8/9/2011		8/11/2010	
8 Bridgeport 9 Broward County		\$29,186 \$53,322	6/17/2013 8/2/2013		3/20/2012 9/6/2012		9/14/2011		9/29/2010	
10 Buffalo		\$36,123	8/6/2013		10/24/2012		9/16/2011		9/8/2010	
11 Charleston County		\$36,123	8/6/2013		3/13/2013		9/9/2011		did not pay	
12 Charlotte-Mecklenburg		\$46,440	6/7/2013	***	6/19/2012	***	5/25/2011	***	5/18/2010	***
13 Chicago		\$53,322	10/4/2013		11/14/2012		6/23/2012		4/6/2011	
14 Cincinnati		\$36,123	10/23/2013		7/12/2012		1/11/2012		6/22/2010	***
15 Clark County		\$53,322	2/11/2014		7/24/2012		7/7/2011		5/25/2010	***
16 Cleveland		\$41,281	6/17/2013	***	7/30/2012		11/15/2011		6/3/2010	***
17 Columbus		\$41,281	7/22/2013		9/12/2012		3/22/2012		8/11/2010	
18 Dallas		\$46,440	7/19/2013		6/19/2012	***	6/2/2011	***	5/25/2010	***
19 Dayton		\$36,123	4/4/2014		8/24/2012		8/9/2011		9/29/2010	
20 Denver		\$41,281	7/22/2013		7/12/2012		8/29/2011		11/17/2010	
21 Des Moines*		\$29,186	7/16/2013		7/18/2012		11/30/2011		did not pay	
22 Detroit		\$46,440	5/23/2014		1/3/2013		10/14/2011		5/2/2011	
23 Duval County		\$46,440	9/3/2013		8/8/2012		8/29/2011		7/27/2010	***
24 East Baton Rouge		\$36,123	10/7/2013		did not pay		did not pay		5/20/2010	***
25 El Paso ISD 26 Fort Worth		\$17,414 \$41,281	4/22/2014 10/7/2013		8/31/2012		3/8/2012		8/25/2010	
27 Fresno		\$41,281	8/27/2013		8/24/2012		9/14/2011		9/29/2010	
28 Greensboro(Guilford Cty)		\$41,281	10/23/2013		8/14/2012		5/15/2012		8/30/2010	
29 Hillsborough County (Tampa)		\$46,440	7/22/2013		7/24/2012		8/9/2011		6/22/2010	***
30 Houston		\$53,322	7/19/2013		8/14/2012		8/2/2011		8/2/2010	
31 Indianapolis		\$18,061.50	11/6/2013		7/12/2012		7/11/2011		7/7/2010	
32 Jackson. MS		\$15,051	2/10/2014		did not pay		did not pay		10/19/2010	
33 Jefferson County		\$41,281	8/13/2013		8/6/2012		8/12/2011		7/20/2010	
34 Kansas City, MO		\$36,123	3/19/2014		8/31/2012		5/31/2011	***	6/22/2010	***
35 Little Rock	\$29,186				did not pay		7/25/2011		8/25/2010	
36 Long Beach		\$41,281	9/10/2013		8/1/2012		8/12/2011		9/3/2010	
37 Los Angeles	010.110	\$53,322	3/13/2014		3/15/2013		3/26/2012		7/13/2010	
38 Memphis (Shelby County) 39 Miami-Dade County	\$46,440	#E0.000	7/22/2012		8/24/2012		8/29/2011		7/20/2010	
40 Milwaukee		\$53,322 \$46,440	7/22/2013 7/31/2013		8/24/2012 6/19/2012	***	8/9/2011 6/21/2011	***	2/24/2011 5/18/10	***
41 Minneapolis		\$36,123	11/6/2013		9/25/2012		9/7/2011		8/11/2010	
42 Nashville		\$41,281	8/1/2013		7/24/2012		7/14/2011		7/20/2010	
43 New Orleans	\$41,281	• ,= • .	3, 1, 2, 1, 2		did not pay		did not pay		did not pay	
44 New York City		\$53,322	2/24/2014		1/18/2013		12/23/2011		9/20/2011	
45 Newark		\$36,123	11/26/2013		12/16/2013		4/26/2012		7/27/2010	
46 Norfolk		\$36,123	4/4/2014		2/27/2013		9/9/2011		2/7/2011	
47 Oakland		\$36,123	7/16/2013		9/17/2012		2/3/2012		7/27/2010	
48 Oklahoma City	\$36,123				8/14/2012		8/12/2011		8/19/2010	
49 Omaha		\$36,123	6/25/2013	***	7/13/2012		6/7/2011	***	6/8/2010	***
50 Orange County, FL		\$46,440	6/4/2013	***	7/31/2012		6/7/2011	***	7/7/2010	***
51 Palm Beach County		\$46,440	2/18/2014		9/12/2012		3/13/2012		4/6/2011	
52 Philadelphia		\$53,322 \$36,422	10/4/2013	***	9/28/2012	***	11/18/2011	***	7/26/2010	***
53 Pittsburgh		\$36,123	5/24/2013	***	6/28/2012	***	5/25/2011	***	6/16/2010	***
54 Portland 55 Providence*		\$36,123 \$29,186	7/11/2013		6/14/2012 9/18/2012		5/31/2011		5/25/2010	
56 Richmond		\$36,123	2/18/2014 4/7/2014		6/15/2012	***	7/25/2011 5/25/2011	***	10/13/2010 5/25/2010	***
57 Rochester		\$36,123	6/11/2013	***	6/14/2012	***	5/25/2011	***	5/25/2010	***
58 St. Louis		\$36,123	3/27/2014		8/13/2013		did not pay		did not pay	
59 St. Paul		\$36,123	7/5/2013		6/15/2012	***	5/25/2011	***	7/13/2010	
60 Sacramento		\$36,123	10/15/2013		8/8/2012		7/25/2011		7/20/2010	
61 San Diego		\$46,440	8/1/2013		3/1/2013		8/26/2011		9/29/2010	
62 San Francisco		\$41,281	8/1/2013		8/17/2012		7/27/2011		7/27/2010	
63 Santa Ana		\$41,281	3/4/2014		8/8/2012					
64 Seattle		\$36,123	6/4/2013	***	3/1/2013		6/27/2011	***	9/20/2010	
65 Toledo		\$36,123	7/18/2013		8/14/2012		9/9/2011		3/15/2011	
66 Washington, D.C.		\$41,281	7/5/2013	,	9/27/2012		5/30/2012		6/20/2011	
67 Wichita		\$36,123	6/17/2013	***	6/19/2012	***	6/16/2011	***	6/16/2010	***

\$153,030

\$2,510,069

11

14

17

20

Total

^{*}Largest city in the state
*** Prepaid members

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2013-2014

BY FUNCTION

OFNEDAL OPERATING DEVENUE		AUDITED TOTAL FY12-13		REVISED BUDGET FY13-14	PRELIMINARY 4TH QUARTER REPORT FY13-14		
GENERAL OPERATING REVENUE							
MEMBERSHIP DUES GRANTS AND CONTRACTS	\$ \$	2,498,135.00	\$ \$	2,513,727.00	\$ \$	2,545,576.50 -	
SPONSOR CONTRIBUTION REGISTRATION FEES	\$ \$ \$	20,000.00	\$ \$	40,000.00	\$ \$	10,000.00	
INTEREST AND DIVIDENDS ROYALTIES AND OTHER INCOME	\$ _\$	109,771.16 217.15	\$ \$	200,000.00 500.00	\$ \$	223,310.03 361.23	
TOTAL REVENUE	\$	2,628,123.31	\$	2,754,227.00	\$	2,779,247.76	
GENERAL OPERATING EXPENSES							
ADMIN AND FINANCIAL MANAGEMENT	\$	1,003,433.67	\$	1,071,499.25	\$	961,120.46	
EXECUTIVE LEADERSHIP	\$	450,484.74	\$	647,455.00	\$	491,688.99	
FUNDRAISING ACTIVITIES LEGISLATIVE ADVOCACY	\$ \$ \$ \$ \$ \$ \$ \$	29,576.37	\$ \$	26,000.00 500,071.25	\$ \$	45,075.33	
CURRICULUM & INSTRUCTION	Ф Ф	454,006.94 85,516.56	э \$	149,000.00	э \$	482,111.84 59,194.36	
PUBLIC ADVOCACY	Ψ \$	376,057.02	\$	454,901.25	φ \$	408,586.56	
MEMBER MANAGEMENT SERVICES	\$	202,054.41	\$	204,741.25	\$	200,521.30	
POLICY RESEARCH	\$	287,598.30	\$	621,845.00	\$	254,140.61	
EXPENSES ALLOCATED TO PROJECTS	\$	(437,220.72)	\$	(921,286.00)	\$	(476,629.06)	
TOTAL OPERATING EXPENSES	_\$	2,451,507.29	\$	2,754,227.00	\$	2,425,810.39	
REVENUE OVER EXPENSES	\$	176,616.02	\$		\$	353,437.37	
ADJUSTMENTS:							
OPERATIONS CARRYOVER BALANCE	\$	7,817,414.30			\$	7,765,234.25	
CATEGORICAL PROG NET REVENUE	\$	(370,842.65)			\$	1,700,705.00	
NET GAIN/(LOSS) ON INVESTMENT	\$	142,046.58			\$	2,701.00	
ENDING BALANCE	\$	7,765,234.25			\$	9,822,077.62	

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2013-2014

BY EXPENSE LINE

		AUDITED TOTAL FY12-13		REVISED BUDGET FY13-14	PRELIMINARY 4TH QUARTER REPORT FY13-14		
GENERAL OPERATING REVENUE							
MEMBERSHIP DUES GRANTS AND CONTRACTS SPONSOR CONTRIBUTION REGISTRATION FEES INTEREST AND DIVIDENDS ROYALTIES AND OTHER INCOME	\$ \$ \$ \$ \$	2,498,135.00 - 20,000.00 - 109,771.16 217.15	\$ \$ \$ \$	2,513,727.00 - 40,000.00 - 200,000.00 500.00	\$ \$ \$ \$ \$	2,545,576.50 - 10,000.00 - 223,310.03 361.23	
TOTAL REVENUE	\$	2,628,123.31	\$	2,754,227.00	\$	2,779,247.76	
GENERAL OPERATING EXPENSES							
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL & MEETINGS GENERAL SUPPLIES SUBSCRIPTION & PUBLICATIONS COPYING & PRINTING OUTSIDE SERVICES TELEPHONE POSTAGE & SHIPPING EQPT LEASE MAINT & DEP OFFICE RENT & UTILITIES ALLO FOR UNCOLLECTED REVENUE EXPENSES ALLOCATED TO PROJECTS	****	1,800,405.48 15,674.08 67,444.19 31,248.94 17,243.53 113,798.55 418,497.44 40,173.32 13,293.08 17,627.63 283,221.77 70,100.00 (437,220.72)	****	2,516,200.00 15,000.00 70,400.00 27,000.00 20,000.00 125,000.00 498,000.00 35,000.00 10,000.00 15,000.00 293,913.00 50,000.00 (921,286.00)	****	1,888,545.98 17,336.10 54,850.44 21,605.04 17,916.57 129,927.51 369,700.43 39,796.54 5,983.40 14,138.82 272,638.62 70,000.00 (476,629.06)	
TOTAL OPERATING EXPENSES	\$	2,451,507.29	_\$_	2,754,227.00	\$	2,425,810.39	
REVENUE OVER EXPENSES	\$	176,616.02	\$	<u>-</u>	\$	353,437.37	
ADJUSTMENTS: OPERATIONS CARRYOVER BALANCE CATEGORICAL PROG NET REVENUE NET (GAIN)/LOSS ON INVESTMENT ENDING BALANCE	\$ \$ \$	7,817,414.30 (370,842.65) 142,046.58 7,765,234.25			\$ \$ \$	7,765,234.25 1,700,705.00 2,701.00 9,822,077.62	

(7/14/14) (4th Qtr Report.xls)

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2012-13 AUDITED TOTALS FOR FISCAL YEAR ENDING JUNE 30, 2013

	ADMIN & FINAN MANAGEMENT (10)	EXECUTIVE SUPPORT (11)	FUNDRAISING ACTIVITIES (12)	LEGISLATIVE SERVICES (13&31)	CURRICULUM & INSTRUCT (14)	PUBLIC ADVOCACY (15)	MEMBER MGT SERVICES (16)	POLICY RESEARCH (17)	AUDITED TOTAL (7/1/12-6/30/13)
GENERAL OPERATING EXPENSES									
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL & MEETINGS GENERAL SUPPLIES SUBSCRIPTION & PUBLICATIONS COPYING & PRINTING OUTSIDE SERVICES PARTICIPANT SUPPORT COST TELEPHONE POSTAGE & SHIPPING EQPT LEASE MAINT & DEP OFFICE RENT & UTILITIES	\$357,102.45 15,674.08 2,444.26 31,248.94 1,435.09 7.60 200,975.80 0.00 14,817.37 8,778.68 17,627.63 283,221.77	\$390,990.00 0.00 42,526.56 0.00 0.00 7,855.74 240.00 0.00 5,755.46 3,116.98 0.00	\$29,576.37 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$340,240.36 0.00 7,423.00 0.00 6,821.44 86.80 94,101.63 0.00 4,796.71 537.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 85,418.79 0.00 97.77 0.00 0.00	\$275,226.43 0.00 1,304.34 0.00 6,531.38 89,029.86 85.00 0.00 3,443.97 436.04 0.00 0.00	\$156,455.23 0.00 3,359.99 0.00 1,095.39 0.00 36,855.00 0.00 4,128.02 160.78 0.00 0.00	\$250,814.64 0.00 10,386.04 0.00 1,360.23 16,818.55 821.22 0.00 7,134.02 263.60 0.00	\$1,800,405.48 15,674.08 67,444.19 31,248.94 17,243.53 113,798.55 418,497.44 0.00 40,173.32 13,293.08 17,627.63 283,221.77
PROJECT IN-KIND CONTRIBUTION UNCOLLECTED REVENUE EXPENSES ALLOCATED TO PROJECTS	0.00 70,100.00 (437,220.72)	0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00	0.00 70,100.00 (437,220.72)
TOTAL OPERATING EXPENSES	\$566,212.95 \$437,220.72 \$0.00 \$1,003,433.67	\$450,484.74	\$29,576.37	\$454,006.94	\$85,516.56	\$376,057.02	\$202,054.41	\$287,598.30	\$2,451,507.29

(07/14/14) (Budget-Jan 2014)

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET REVISED BUDGET FOR FISCAL YEAR 2013-14

	FINANCE & ADMIN (10)	EXECUTIVE SUPPORT (11)	FUNDRAISING ACTIVITIES (12)	LEGISLATIVE ADVOCACY (13)	CURRICULUM & INSTRUCTION (14)	PUBLIC ADVOCACY (15)	MEMBER MGT SERVICES (16)	RESEARCH ADVOCACY (17)	ONE YEAR TOTAL
GENERAL OPERATING EXPENSES									
SALARIES & FRINGE BENEFITS	\$456,286.25	\$596,055.00	\$25,000.00	\$366,371.25	\$0.00	\$325,901.25	\$155,741.25	\$590,845.00	\$2,516,200.00
OTHER INSURANCE	15,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$15,000.00
TRAVEL & MEETINGS	2,500.00	38,900.00	0.00	10,000.00	0.00	6,000.00	3,000.00	10,000.00	\$70,400.00
GENERAL SUPPLIES	27,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$27,000.00
SUBSCRIPTION & PUBLICATIONS	1,200.00	0.00	0.00	10,200.00	0.00	5,000.00	100.00	3,500.00	\$20,000.00
COPYING & PRINTING	500.00	5,000.00	0.00	3,000.00	0.00	105,500.00	1,000.00	10,000.00	\$125,000.00
OUTSIDE SERVICES	205,100.00	3,000.00	0.00	100,000.00	149,000.00	\$0.00	39,900.00	1,000.00	\$498,000.00
TELEPHONE	4,500.00	4,000.00	500.00	10,000.00	0.00	5,000.00	5,000.00	6,000.00	\$35,000.00
POSTAGE & SHIPPING	500.00	500.00	500.00	500.00	0.00	7,500.00	0.00	500.00	\$10,000.00
EQPT LEASE MAINT & DEP	15,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$15,000.00
OFFICE RENT & UTILITIES	293,913.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$293,913.00
ALLOWANCE FOR BAD DEBTS	50,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$50,000.00
EXPENSES ALLOCATED TO PROJECTS	(921,286.00)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(\$921,286.00)
TOTAL OPERATING EXPENSES	\$150,213.25	\$647,455.00	\$26,000.00	\$500,071.25	\$149,000.00	\$454,901.25	\$204,741.25	\$621,845.00	\$2,754,227.00
	\$921,286.00								

\$1,071,499.25

(10/09/14) (4th QTR FY2013-14)

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2013-14 PRELIMINARY TOTALS FOR FISCAL YEAR ENDING JUNE 30, 2014

GENERAL OPERATING EXPENSES	FINANCE & ADMIN (10)	EXECUTIVE SUPPORT (11)	FUNDRAISING ACTIVITIES (12)	LEGISLATIVE ADVOCACY (13)	CURRICULUM & INSTRUCTION (14)	PUBLIC ADVOCACY (15)	MEMBER MGT SERVICES (16)	RESEARCH ADVOCACY (17)	PRELIMINARY 4TH QUARTER TOTAL (7/1/13-06/30/14)
SALARIES & FRINGE BENEFITS	\$381,783.41	\$438,836.90	\$45,075.33	\$356,196.06	\$0.00	\$293,207.50	\$151,018.53	\$222,428.25	\$1,888,545.98
OTHER INSURANCE	17,336.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	17,336.10
TRAVEL & MEETINGS	2,248.87	31,646.44	0.00	1,814.05	0.00	3,352.98	2,526.47	13,261.63	54,850.44
GENERAL SUPPLIES	21,605.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21,605.04
SUBSCRIPTION & PUBLICATIONS	2,223.70	1,099.00	0.00	9,517.33	0.00	3,976.64	0.00	1,099.90	17,916.57
COPYING & PRINTING	68.00	10,737.91	0.00	0.00	0.00	102,096.20	6,407.12	10,618.28	129,927.51
OUTSIDE SERVICES	161,291.18	1,128.00	0.00	109,633.68	59,089.12	1,746.85	36,855.00	(43.40)	369,700.43
TELEPHONE	14,953.07	6,635.57	0.00	4,697.66	31.65	3,335.44	3,645.49	6,497.66	39,796.54
POSTAGE & SHIPPING	2,833.65	1,605.17	0.00	253.06	73.59	870.95	68.69	278.29	5,983.40
EQPT LEASE MAINT & DEP	14,138.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14,138.82
OFFICE RENT & UTILITIES	272,638.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	272,638.62
ALLO FOR UNCOLLECTED REVENUE	70,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	70,000.00
EXPENSES ALLOCATED TO PROJECTS _	(476,629.06)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(476,629.06)
TOTAL OPERATING EXPENSES	\$484,491.40 \$476,629.06	\$491,688.99	\$45,075.33	\$482,111.84	\$59,194.36	\$408,586.56	\$200,521.30	\$254,140.61	\$2,425,810.39

\$961,120.46

INVESTMENT SCHEDULE - FY13-14 ENDING 6/30/14 Balances are from date of purchase

INVESTMENT ACCOUNTS	ENDING BALANCE 6/30/2014	PURCHASES (7/1/13 - 6/30/14)	SOLD (7/1/13 - 6/30/14)	UNREAL GAINS/(LOSS) (7/1/13 - 6/30/14)	REAL GAINS/(LOSS) (7/1/13 - 6/30/14)
Amer Cent Fds	\$369,456	\$132,402	-\$4,031	\$48,412	\$1,067
Amer Centy Invt TR Diversified	\$0	\$57,372	-\$116,309	\$1,926	-\$3,295
Artisan FDS Inc Sm Cap	\$174,627	\$60,788	\$0	\$13,723	\$0
Dodge&Cox Intl Stock	\$230,530	\$56,833	-\$4,610	\$45,798	\$166
Dreyfus Emerging Markets FD	\$223,365	\$89,726	-\$6,344	\$35,473	-\$1,483
Eaton Vance Inc Fd	\$85,904	\$38,521	\$0	\$3,245	\$0
Eaton Vance Large Cap Val Fd	\$464,157	\$149,827	\$0	\$62,625	\$0
First Eagle Fds Sogen Overseas	\$176,595	\$69,663	-\$427	\$14,835	\$49
Goldma Sachs TRUST Strat Inc Fd	\$122,484	\$121,083	\$0	\$1,402	\$0
Goldman Sachs Treas Instr	\$39,092	\$18,539	\$0	\$0	\$0
Harbor Fund Cap Appr	\$465,015	\$160,777	\$0	\$86,452	\$0
Harris Assoc Invt Tr Oakmk Equity	\$488,987	\$239,140	\$0	\$38,536	\$0
JANUS Intl FD FL BD	\$168,022	\$82,841	\$0	\$2,867	\$0
JPMorgan Core Bd FD Selct	\$288,999	\$191,372	-\$110,824	-\$2,325	\$2,571
Munder Midcap Core	\$135,729	\$37,322	-\$818	\$20,779	\$289
Nuveen INVT Fds Inc RE Secs*	\$92,591	\$44,553	\$0	\$3,726	\$0
PIMCO Fds PAC Total Return	\$249,858	\$120,519	\$0	\$5,065	\$0
PIMCO Fds SER Comm Real	\$172,474	\$90,059	\$0	\$13,521	\$0
Pioneer Oak Ridge Sm Cp	\$173,730	\$52,092	-\$8,141	\$20,901	\$3,132
Royce Value Plus FD CL	\$90,395	\$29,382	-\$391	\$9,178	\$172
Virtus Emerging Mkts Opportunites	\$86,464	\$38,247	\$0	\$4,952	\$0
Crm WT Mut Fd Midcap	\$136,237	53,967.48	-\$229	\$4,583	\$32
Alliance GLO Govt Tr A	\$1,265,762	\$31,228	\$0	\$3,166	\$0
Alliance Interm Bd A	\$112,916	\$3,149	\$0	\$858	\$0
Alliance Interm Bd C	\$91,087	\$1,992	\$0	\$2,742	\$0
Fidelity	\$11,033	\$156	\$0	\$2	\$0
TOTAL:	\$5,915,510	\$1,971,551	-\$252,124	\$442,439	\$2,701

Components of Operational Expense Types

Salaries and Fringe Benefits
Basic salaries
Life and disability insurance
403 (b) employer contribution
Health benefits
Unemployment compensation
Employment taxes
Paid absences
Other Insurances
Officers and Directors Liability
Umbrella Liability
Workmen's Compensation
Travel and Meetings
Staff Travel (unreimbursed)
General Supplies
Paper
Letterhead
Mailing labels
Envelops
Folders
Binders
Computer supplies
Subscriptions and Publications
New York Times
USA Today
Education Weekly
Education Daily
Committee for Education Funding membership
AERA membership
NABJ membership
Bank card
Copying and Printing
Report printing

Urban Educator printing

Outside Services

Auditing Services

Technology and internet support

Database maintenance

Corporate registration

Banking services and charges

Temporary services

Editing services

Legal services

ADP payroll services

Transact license

Ricki Price-Baugh

Julie Wright-Halbert

Strategic Support Team Member expenses

Participant Support Costs

SubGrantee Expenses

Telephone

Monthly telephone

Conference calls

Cell phones

Postage and Shipping

Mailings

Messenger services

Federal Express

UPS

Equipment Lease, Maintenance and Deprecation

Postage meter

Copier Maintenance

Computers

Printers

Fax machine

Office Rent and Utilities

Office rent

Off-site storage

Project In-kind Contribution

Matching

Expenses Allocated to Projects

Indirect costs

CATEGORICAL PROGRAMS BUDGET REPORT

ESTIMATED TOTALS FOR FISCAL YEAR 2013-2014

ENDING JUNE 30, 2014

THE COUNCIL OF THE GREAT CITY SCHOOLS REVENUE AND EXPENSE REPORT

PRELIMINARY TOTALS FOR FISCAL YEAR ENDING JUNE 30, 2014

CATEGORICAL PROJECTS PAGE 1 OF 2

	MEETINGS AND CONFERENCES (20)	EXXON MOBIL BHARRIS M&S SCHOLARSHIPS (20-EX)	STRATEGIC SUPPORT TEAMS (21)	SPECIAL PROJECTS ACCOUNT (22)	SEF GRANT (24)	HEWLETT COMMON CORE ACCOUNT (27)	KPI BUSINESS PLAN (29)	CARNEGIE FOUNDATION KPI (30)	GATES SOLUTIONS TO COMM CORE (32)
OPERATING REVENUE									
MEMBER DUES GRANTS & CONTRACTS SPONSOR CONTRIBUTION REGISTRATION FEES INTEREST AND DIVIDENDS ROYALTIES AND OTHER INCOME	\$0.00 0.00 816,210.00 407,561.00 0.00 4,106.73	\$0.00 0.00 25,000.00 0.00 0.00	\$0.00 309,076.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 50,000.00 0.00 0.00 0.00 0.00	\$0.00 500,000.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 45,990.00	\$0.00 50,000.00 0.00 0.00 0.00 0.00	\$0.00 2,000,000.00 0.00 0.00 0.00
TOTAL REVENUE	\$1,227,877.73	\$25,000.00	\$309,076.00	\$0.00	\$50,000.00	\$500,000.00	\$45,990.00	\$50,000.00	\$2,000,000.00
OPERATING EXPENSES									
SALARIES & FRINGE BENEFITS	\$111,587.30	\$0.00	\$0.00	\$0.00	\$0.00	\$8,342.70	\$18,688.77	\$0.00	\$48,353.34
OTHER INSURANCE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TRAVEL AND MEETING EXPENSES	824,195.28	187.12	40,581.49	15,028.00	0.00	10,649.38	1,105.18	0.00	9,425.72
GENERAL SUPPLIES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DUES, SUBSCR & PUBLICATION	0.00	0.00	1,433.40	0.00	0.00	0.00	0.00	0.00	1,052.50
COPYING & PRINTING	26,022.82	281.90	0.00	0.00	0.00	26.24	214.86	0.00	0.00
OUTSIDE SERVICES	142,353.13	20,600.00	145,711.33	32,074.49	0.00	121,420.58	6,567.38	44,500.00	60,023.02
TELEPHONE	2,045.44	0.00	0.00	0.00	0.00	15.39	306.96	0.00	0.00
POSTAGE & SHIPPING	10,838.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EQPT LEASE MAINT & DEP	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OFFICE RENT & UTILITIES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
UNCOLLECTED REVENUE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EXPENSES ALLOCATED TO PROJECTS	100,000.00	3,930.98	68,479.55	0.00	0.00	35,113.57	6,720.79	5,500.00	17,828.19
TOTAL PROJECT EXPENSES	\$1,217,042.94	\$25,000.00	\$256,205.77	\$47,102.49	\$0.00	\$175,567.86	\$33,603.94	\$50,000.00	\$136,682.77
REVENUE OVER EXPENSES	\$10,834.79	\$0.00	\$52,870.23	(\$47,102.49)	\$50,000.00	\$324,432.14	\$12,386.06	\$0.00	\$1,863,317.23
CLOSEOUT OF COMPLETED PROJECTS	(\$200,000.00)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
IN-KIND CONTRIBUTION	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CARRYOVER BALANCE 6/30/13	\$731,130.55	\$0.00	\$0.00	\$250,233.39	\$0.00	\$0.00	(\$53,654.07)	\$0.00	\$0.00
ENDING BALANCE 06/30/14	\$541,965.34	\$0.00	\$52,870.23	\$203,130.90	\$50,000.00	\$324,432.14	(\$41,268.01)	\$0.00	\$1,863,317.23

THE COUNCIL OF THE GREAT CITY SCHOOLS REVENUE AND EXPENSE REPORT

PRELIMINARY TOTALS FOR FISCAL YEAR ENDING JUNE 30, 2014

CATEGORICAL PROJECTS PAGE 2 OF 2

	HELMSLEY GRANT (34)	URBAN DEANS NETWK (40)	S Schwartz Urban Impact Award (41)	GATES FOUNDATION COMMON CORE (45)	IN-KIND COMMON CORE (45-IK)	GATES FOUNDATION ELL GRANT (47)	GATES FOUNDATION MATERIALS (47-A)	GATES FOUNDATION KPI GRANT (48)	WALLACE FOUNDATION GRANT (51/52)	PRELIMINARY 4TH QUARTER TOTAL
OPERATING REVENUE										
MEMBER DUES GRANTS & CONTRACTS SPONSOR CONTRIBUTION REGISTRATION FEES INTEREST ROYALTIES	\$0.00 160,000.00 0.00 0.00 0.00 0.00	\$13,500.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 1,500.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 773.14 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 600,196.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 470,000.00 0.00 0.00 0.00 0.00	\$13,500.00 \$4,139,272.00 \$842,710.00 \$407,561.00 \$773.14 \$50,096.73
TOTAL REVENUE	\$160,000.00	\$13,500.00	\$1,500.00	\$773.14	\$0.00	\$0.00	\$600,196.00	\$0.00	\$470,000.00	\$5,453,912.87
OPERATING EXPENSES										
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL AND MEETING EXPENSES GENERAL SUPPLIES DUES, SUBSCR & PUBLICATION COPYING & PRINTING OUTSIDE SERVICES TELEPHONE POSTAGE & SHIPPING EQPT LEASE MAINT & DEP OFFICE RENT & UTILITIES	\$0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$24,529.92 0.00 1,243.30 0.00 0.00 0.00 769.44 307.66 335.53 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	\$660,226.49 0.00 63,343.35 0.00 1,427.06 18,190.91 217,579.71 814.78 95.27 0.00	\$133,224.30 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$19,155.99 0.00 12,375.88 - 7,708.50 31,625.79 28.79 70.69	\$34,453.13 0.00 9,205.32 1,356.23 53,150.04 356.91	\$33,670.30 0.00 3,594.04 - 510.83 - 223,653.64 479.48 -	\$18,640.19 0.00 779.51 0.00 0.00 - 0.00 43.15 0.00 0.00	\$1,110,872.43 \$0,00 \$991,713.57 \$0,00 \$5,780.02 \$52,445.23 \$1,100,028.55 \$4,041.65 \$11,697.37 \$0,00 \$0,00
UNCOLLECTED REVENUE	0.00	0.00	0.00	0.00	0.00		<u>.</u>		0.00	\$0.00
EXPENSES ALLOCATED TO PROJECTS	0.00	4,077.88	0.00	144,251.64	19,983.65	\$10,644.85	\$14,778.24	\$39,286.24	\$6,033.48	\$476,629.05
TOTAL PROJECT EXPENSES	\$0.00	\$31,263.73	\$0.00	\$1,105,929.21	\$153,207.95	\$81,610.49	\$113,299.87	\$301,194.53	\$25,496.33	\$3,753,207.87
REVENUE OVER EXPENSES	\$160,000.00	(\$17,763.73)	\$1,500.00	(\$1,105,156.07)	(\$153,207.95)	(\$81,610.49)	\$486,896.13	(\$301,194.53)	\$444,503.67	\$1,700,705.00
CLOSEOUT OF COMPLETED PROJECTS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	(\$200,000.00)
IN-KIND CONTRIBUTION	\$0.00	\$0.00	\$0.00	\$0.00	\$153,207.95	\$0.00	\$0.00	\$0.00	\$0.00	\$153,207.95
CARRYOVER BALANCE 6/30/13	\$0.00	\$34,966.33	\$18,426.50	\$1,887,549.00	\$0.00	\$148,007.40	\$0.00	\$604,393.38	\$0.00	\$3,621,052.48
ENDING BALANCE 06/30/14	\$160,000.00	\$17,202.60	\$19,926.50	\$782,392.93	\$0.00	\$66,396.91	\$486,896.13	\$303,198.85	\$444,503.67	\$5,274,965.42

2014-2015 BUDGET

GENERAL OPERATING BUDGET FOR

FISCAL YEAR 2014-2015

COUNCIL OF THE GREAT CITY SCHOOLS

1301 Pennsylvania Avenue, N.W., Suite 702, Washington, D.C. 20004 Tel (202) 393-2427 Fax (202) 393-2400 Web Page: http://www.cgcs.org



MEMBERSHIP DUES STRUCTURE BY TIERS

		WITH 1.24% INCREASE
	2013-2014 DUES	2014-2015 DUES
Largest city in the state TIER I	\$29,186.00	\$29,548.00
Based on enrollment		
TIER II 35,000 TO 54,000	\$36,123.00	\$36,571.00
TIER III 54,001 TO 99,000	\$41,281.00	\$41,793.00
TIER IV 99,001 TO 200,000	\$46,440.00	\$47,016.00
TIER V 200,001 PLUS	\$53,322.00	\$53,983.00

COUNCIL OF THE GREAT CITY SCHOOLS FY 2014-15 Membership Dues

STATUS OF MEMBERSHIP DUES AS OF October 10, 2014

			Date Rec'd		Date Rec'd		Date Rec'd		Date Rec'd	
DISTRICT	NOT PAID	PAID	FY14-15		FY13-14		FY12-13		FY11-12	
1 Albuquerque		\$41,793	7/21/2014		7/22/2013		6/19/2012	***	6/21/2011	*
2 Anchorage		\$36,571	6/3/2014	***	7/2/2013		6/14/2012	***	7/7/2011	
3 Atlanta		\$36,571	8/11/2014		7/16/2013		6/15/2012	***	5/25/2011	*
4 Austin	\$41,793	***	0, ==, ===		6/11/2013	***	6/14/2012	***	5/25/2011	*
5 Baltimore	, ,	\$41,793	7/23/2014		8/13/2013		7/18/2012		7/11/2011	
6 Birmingham		\$36,571	6/30/2014	***	5/30/2013	***	2/27/2013		6/16/2011	*
7 Boston		\$41,793	8/11/2014		8/7/2013		8/24/2012		8/9/2011	
8 Bridgeport		\$29,548	6/26/2014	***	6/17/2013	***	3/20/2012	***		
9 Broward County		\$53,983	9/23/2014		8/2/2013		9/6/2012		9/14/2011	
10 Buffalo		\$36,571	8/18/2014		8/6/2013		10/24/2012		9/16/2011	
11 Charleston County	\$36,571				8/6/2013		3/13/2013		9/9/2011	
12 Charlotte-Mecklenburg		\$47,016	6/13/2014	***	6/7/2013	***	6/19/2012	***	5/25/2011	*
13 Chicago	\$53,983				10/4/2013		11/14/2012		6/23/2012	
14 Cincinnati	\$36,571				10/23/2013		7/12/2012		1/11/2012	
15 Clark County		\$53,983	7/31/2014		2/11/2014		7/24/2012		7/7/2011	
16 Cleveland		\$36,571	6/30/2014	***	6/17/2013	***	7/30/2012		11/15/2011	
17 Columbus		\$41,793	8/29/2014		7/22/2013		9/12/2012		3/22/2012	*
18 Dallas		\$47,016	7/21/2014		7/19/2013		6/19/2012	***	6/2/2011	
19 Dayton		\$36,571	8/18/2014		4/4/2014		8/24/2012		8/9/2011	
20 Denver		\$41,793 \$20,548	8/4/2014	***	7/22/2013 7/16/2013		7/12/2012		8/29/2011	
21 Des Moines* 22 Detroit	\$47,016	\$29,548	6/17/2014		7/16/2013 5/23/2014		7/18/2012 1/3/2013		11/30/2011 10/14/2011	
	φ 4 1,016	¢47.046	0/4/2014							
23 Duval County 24 East Baton Rouge		\$47,016 \$36,571	8/4/2014 8/8/2014		9/3/2013		8/8/2012 did not pay		8/29/2011	
25 El Paso	\$41,793	φ30,371	0/0/2014		10/7/2013 4/22/2014		not a member		did not pay	
26 Fort Worth	\$41,793 \$41,793				10/7/2013		8/31/2012		3/8/2012	
27 Fresno	φ41,793	\$41,793	9/3/2014		8/27/2013		8/24/2012		9/14/2011	
28 Greensboro(Guilford Cty)		\$41,793	10/3/2014		10/23/2013		8/14/2012		5/15/2012	
29 Hawaii	\$47,016	ψ+1,755	10/3/2014		new		not a member		3/13/2012	
30 Hillsborough County (Tampa)	ψ-1,010	\$47,016	7/23/2014		7/22/2013		7/24/2012		8/9/2011	
31 Houston		\$53,983	7/7/2014		7/19/2013		8/14/2012		8/2/2011	
32 Indianapolis		\$36,571	7/7/2014		11/6/2013		7/12/2012		7/11/2011	
33 Jackson. MS		\$36,571	8/11/2014		2/10/2014		did not pay		did not pay	
34 Jefferson County		\$41,793	8/4/2014		8/13/2013		8/6/2012		8/12/2011	
35 Kansas City, MO		\$36,571	9/15/2014		3/19/2014		8/31/2012		5/31/2011	
36 Long Beach		\$41,793	8/11/2014		9/10/2013		8/1/2012		8/12/2011	
37 Los Angeles		\$53,983	8/8/2014		3/13/2014		3/15/2013		3/26/2012	
38 Miami-Dade County		\$53,983	8/4/2014		7/22/2013		8/24/2012		8/9/2011	
39 Milwaukee		\$47,016	6/23/2014	***	7/31/2013		6/19/2012	***	6/21/2011	
40 Minneapolis		\$36,571	8/18/2014		11/6/2013		9/25/2012		9/7/2011	
41 Nashville		\$41,793	7/23/2014		8/1/2013		7/24/2012		7/14/2011	
42 New Orleans	\$41,793				did not pay		did not pay		did not pay	
43 New York City	\$53,983				2/24/2014		1/18/2013		12/23/2011	
44 Newark	\$36,571				11/26/2013		12/16/2013		4/26/2012	
45 Norfolk		\$36,571	9/15/2014		4/4/2014		2/27/2013		9/9/2011	
46 Oakland		\$36,571	6/19/2014	***	7/16/2013		9/17/2012		2/3/2012	
17 Oklahoma City		\$36,571	8/12/2014		did not pay		8/14/2012		8/12/2011	
48 Omaha		\$36,571	6/20/2014	***	6/25/2013	***	7/13/2012		6/7/2011	
19 Orange County, FL		\$47,016	6/2/2014	***	6/4/2013	***	7/31/2012		6/7/2011	
50 Palm Beach County	\$47,016				2/18/2014		9/12/2012		3/13/2012	
51 Philadelphia	\$53,983				10/4/2013		9/28/2012		11/18/2011	
52 Pittsburgh		\$36,571	7/11/2014		5/24/2013	***	6/28/2012	***	5/25/2011	
53 Portland		\$36,571	6/20/2014	***	7/11/2013		6/14/2012	***	5/31/2011	
54 Providence*	\$29,548	000 574		***	2/18/2014		9/18/2012	***	7/25/2011	
55 Richmond		\$36,571	6/11/2014	***	3/31/2014	***	6/15/2012	***	5/25/2011	
56 Rochester		\$36,571	6/11/2014	***	6/11/2013	***	6/14/2012	^^^	5/25/2011	
57 St. Louis		\$36,571	8/11/2014		3/27/2014		8/13/2013	***	did not pay	
58 St. Paul		\$36,571 \$36,571	7/3/2014		7/5/2013		6/15/2012		5/25/2011	
59 Sacramento		\$36,571 \$47,016	8/1/2014		10/15/2013		8/8/2012		7/25/2011	
60 San Diego		\$47,016 \$41,702	8/1/2014		8/1/2013		3/1/2013		8/26/2011	
61 San Francisco		\$41,793 \$41,702	7/31/2014		8/1/2013		8/17/2012		7/27/2011	
62 Santa Ana		\$41,793 \$26,571	8/11/2014		3/4/2014	***	8/8/2012		6/27/2011	
63 Seattle		\$36,571 \$47,016	7/23/2014		6/4/2013		3/1/2013		6/27/2011	
64 Shelby County		\$47,016 \$26,571	8/11/2014		did not pay		8/24/2012		8/29/2011	
65 Toledo		\$36,571	8/11/2014		7/18/2013		8/14/2012		9/9/2011	
66 Washington, D.C.		\$41,793 \$26,571	7/23/2014	***	7/5/2013	***	9/27/2012	***	5/30/2012	
67 Wichita		\$36,571	6/17/2014	^**	6/17/2013	^**	6/19/2012	^**	6/16/2011	

*Largest city in the state
*** Prepaid members

\$609,430

\$2,162,723

14

11

14

17

Total

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2014-15

BY FUNCTION

GENERAL OPERATING REVENUE	AUDITED REPORT FY12-13	PRELIMINARY TOTAL FY13-14	APPROVED BUDGET FY14-15	1ST QTR TOTALS 7/1 - 9/30/14
MEMBERSHIP DUES GRANTS AND CONTRACTS SPONSOR CONTRIBUTION REGISTRATION FEES INTEREST AND DIVIDENDS	\$2,498,135.00 0.00 20,000.00 0.00 109,771.16	\$2,545,576.50 0.00 10,000.00 0.00 223,310.03	\$2,604,975.00 0.00 35,000.00 0.00 200,000.00	\$2,162,723.00 0.00 15,000.00 0.00 46,576.00
ROYALTIES AND OTHER INCOME	217.15	361.23	500.00	0.00
TOTAL REVENUE	\$2,628,123.31	\$2,779,247.76	\$2,840,475.00	\$2,224,299.00
GENERAL OPERATING EXPENSES				
ADMIN AND FINANCIAL MANAGEMENT	\$1,003,433.67	\$961,120.46	\$1,095,843.66	\$267,062.97
EXECUTIVE LEADERSHIP FUNDRAISING ACTIVITIES	450,484.74 29,576.37	491,688.99 45,075.33	667,698.35 26,000.00	127,832.24 5,567.18
LEGISLATIVE ADVOCACY CURRICULUM & INSTRUCTION	454,006.94 85,516.56	482,111.84 59,194.36	511,062.39 149,000.00	128,152.44 34,778.59
PUBLIC ADVOCACY	376,057.02	408,586.56	464,678.29	108,938.37
MEMBER MANAGEMENT SERVICES POLICY RESEARCH	202,054.41 287,598.30	200,521.30 254,140.61	209,413.49 635,563.82	35,639.32 40,379.12
INDIRECT EXPENSES FROM PROJECTS	(437,220.72)	(476,629.06)	(1,180,520.00)	(129,197.12)
TOTAL OPERATING EXPENSES	\$2,451,507.29	\$2,425,810.39	\$2,578,740.00	\$619,153.11
REVENUE OVER EXPENSES	\$176,616.02	\$353,437.37	\$261,735.00	\$1,605,145.89
ADJUSTMENTS:				
OPERATIONS CARRYOVER BALANCE	\$7,817,414.30			
CATEGORICAL PROG NET REVENUE NET GAIN/(LOSS) ON INVESTMENT	(\$370,842.65) \$142,046.58			
ENDING BALANCE	\$7,765,234.25			

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2014-15

BY EXPENSE LINE

GENERAL OPERATING REVENUE	AUDITED REPORT FY12-13	PRELIMINARY TOTAL FY13-14	APPROVED BUDGET FY14-15	1ST QTR TOTALS 7/1 - 9/30/14
MEMBERSHIP DUES GRANTS AND CONTRACTS SPONSOR CONTRIBUTION REGISTRATION FEES INTEREST AND DIVIDENDS ROYALTIES AND OTHER INCOME	\$2,498,135.00 0.00 20,000.00 0.00 109,771.16 217.15	\$2,545,576.50 0.00 10,000.00 0.00 223,310.03 361.23	\$2,604,975.00 0.00 35,000.00 0.00 200,000.00 500.00	\$2,162,723.00 0.00 15,000.00 0.00 46,576.00 0.00
TOTAL REVENUE	\$2,628,123.31	\$2,779,247.76	\$2,840,475.00	\$2,224,299.00
GENERAL OPERATING EXPENSES				
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL & MEETINGS GENERAL SUPPLIES SUBSCRIPTION & PUBLICATIONS COPYING & PRINTING OUTSIDE SERVICES TELEPHONE POSTAGE & SHIPPING EQPT LEASE MAINT & DEPRECIATION OFFICE RENT & UTILITIES ALLO FOR UNCOLLECTED REVENUE INDIRECT EXPENSES FROM PROJECTS	\$1,800,405.48 15,674.08 67,444.19 31,248.94 17,243.53 113,798.55 418,497.44 40,173.32 13,293.08 17,627.63 283,221.77 70,100.00 (437,220.72)	\$1,888,545.98 17,336.10 54,850.44 21,605.04 17,916.57 129,927.51 369,700.43 39,796.54 5,983.40 14,138.82 272,638.62 70,000.00 (476,629.06)	\$2,590,000.00 15,000.00 70,000.00 30,000.00 20,000.00 125,000.00 498,000.00 35,000.00 10,000.00 301,260.00 50,000.00 (1,180,520.00)	\$461,922.91 0.00 20,052.01 5,475.74 10,212.08 29,984.75 92,678.44 7,885.07 1,916.97 10,599.27 107,622.98 0.00 (129,197.12)
TOTAL OPERATING EXPENSES	\$2,451,507.29	\$2,425,810.39	\$2,578,740.00	\$619,153.11
REVENUE OVER EXPENSES	\$176,616.02	\$353,437.37	\$261,735.00	\$1,605,145.89
ADJUSTMENTS: OPERATIONS CARRYOVER BALANCE CATEGORICAL PROG NET REVENUE NET (GAIN)/LOSS ON INVESTMENT ENDING BALANCE	\$7,817,414.30 (\$370,842.65) \$142,046.58 \$7,765,234.25			

(10/10/14) (1st Qtr Report.xls)

THE COUNCIL OF THE GREAT CITY SCHOOLS GENERAL OPERATING BUDGET FOR FY 2014-15 EXPENSES FOR QUARTER ENDING SEPTEMBER 30, 2014

	ADMIN & FINAN MANAGEMENT (10)	EXECUTIVE SUPPORT (11)	FUNDRAISING ACTIVITIES (12)	LEGISLATIVE SERVICES (13&31)	CURRICULUM & INSTRUCT (14)	PUBLIC ADVOCACY (15)	MEMBER MGT SERVICES (16)	POLICY RESEARCH (17)	1ST QUARTER TOTAL (7/1/14-9/30/14)
GENERAL OPERATING EXPENSES									
SALARIES & FRINGE BENEFITS	\$109,112.50	\$107,203.94	\$5,567.18	\$96,249.47	\$0.00	\$74,139.95	\$35,242.39	\$34,407.49	\$461,922.91
OTHER INSURANCE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TRAVEL & MEETINGS	1,096.82	17,531.26	0.00	68.18	0.00	1,355.75	0.00	0.00	20,052.01
GENERAL SUPPLIES	5,475.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,475.74
SUBSCRIPTION & PUBLICATIONS	607.00	0.00	0.00	3,398.33	0.00	3,161.75	0.00	3,045.00	10,212.08
COPYING & PRINTING	44.05	0.00	0.00	0.00	0.00	28,295.38	0.00	1,645.32	29,984.75
OUTSIDE SERVICES	28,286.05	1,589.30	0.00	27,287.00	34,778.59	737.50	0.00	0.00	92,678.44
TELEPHONE	3,570.42	1,384.41	0.00	829.46	0.00	766.64	396.93	937.21	7,885.07
POSTAGE & SHIPPING	648.14	123.33	0.00	320.00	0.00	481.40	0.00	344.10	1,916.97
EQPT LEASE MAINT & DEP	10,599.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,599.27
OFFICE RENT & UTILITIES	107,622.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	107,622.98
ALLO FOR UNCOLLECTED REVENUE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INDIRECT EXPENSES FROM PROJECTS	(129,197.12)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(129,197.12)
TOTAL OPERATING EXPENSES	\$137,865.86 \$129,197.12	\$127,832.24	\$5,567.18	\$128,152.44	\$34,778.59	\$108,938.37	\$35,639.32	\$40,379.12	\$619,153.11

\$267,062.97

CATEGORICAL PROJECTS BUDGET REPORT

FOR

FISCAL YEAR 2014-15

 1^{ST} QUARTER

ENDING SEPTEMBER 30, 2014

THE COUNCIL OF THE GREAT CITY SCHOOLS 1ST QUARTER REVENUE AND EXPENSE REPORT

1ST QTR (7/1/14 - 9/30/14)

CATEGORICAL PROJECTS PAGE 1 OF 2

	MEETINGS AND CONFERENCES (20)	STRATEGIC SUPPORT TEAMS (21)	SPECIAL PROJECTS ACCOUNT (22)	SEF GRANT (24)	HEWLETT COMMON CORE GRANT (27)	KPI BUSINESS PLAN (29)	GATES SOLUTIONS TO COMMON CORE (32)	HELMSLEY GRANT (34)	URBAN DEANS NETWK (40)
OPERATING REVENUE									
MEMBER DUES SPONSOR CONTRIBUTION GRANTS & CONTRACTS INTEREST REGISTRATION FEES SALE OF PUBLICATION	\$0.00 177,500.00 0.00 0.00 256,625.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00							
TOTAL REVENUE	\$434,125.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
OPERATING EXPENSES									
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL AND MEETING EXPENSES GENERAL SUPPLIES DUES, SUBSCR & PUBLICATION	\$31,669.06 0.00 275,357.54 0.00 0.00	\$0.00 0.00 3,630.86 0.00 0.00	\$0.00 0.00 17,134.15 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00	\$29,622.81 0.00 25188 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00	\$26,982.69 0.00 800.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00	\$6,723.45 0.00 0.00 0.00 0.00
COPYING & PRINTING OUTSIDE SERVICES PARTICIPANT SUPPORT COST TELEPHONE	1,791.80 81,690.15 0.00 60.26	0.00 0.00 7,055.09 0.00 0.00	0.00 0.00 6,162.79 0.00 0.00	0.00 0.00 171.56 0.00 0.00	0.00 0.00 39,908.36 0.00 0.00	0.00 0.00 5,023.60 0.00 0.00	0.00 0.00 74,328.97 0.00 0.00	0.00 0.00 274.50 0.00 0.00	0.00 0.00 0.00 0.00 40.80
POSTAGE & SHIPPING EOPT LEASE MAINT & DEP OFFICE RENT & UTILITIES EXPENSES ALLOCATED TO PROJECTS	3,243.99 0.00 0.00	0.00 0.00 0.00 0.00 3,312.64	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 1,255.90	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 \$1,535.48
TOTAL PROJECT EXPENSES	\$452,884.72	\$13,998.59	\$23,296.94	\$171.56	\$69,531.17	\$6,279.50	\$102,111.66	\$274.50	\$8,299.73
REVENUE OVER EXPENSES	(\$18,759.72)	(\$13,998.59)	(\$23,296.94)	(\$171.56)	(\$69,531.17)	(\$6,279.50)	(\$102,111.66)	(\$274.50)	(\$8,299.73)
CLOSEOUT OF COMPLETED PROJECTS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
IN-KIND CONTRIBUTION	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CARRYOVER BALANCE 6/30/14	\$541,965.34	\$52,870.23	\$203,130.90	\$50,000.00	\$324,432.14	(\$41,268.01)	\$1,863,317.23	\$160,000.00	\$17,202.60
ENDING BALANCE 9/30/14	\$523,205.62	\$38,871.64	\$179,833.96	\$49,828.44	\$254,900.97	(\$47,547.51)	\$1,761,205.57	\$159,725.50	\$8,902.87

THE COUNCIL OF THE GREAT CITY SCHOOLS 1ST QUARTER REVENUE AND EXPENSE REPORT

1ST QTR (7/1/14 - 9/30/14)

CATEGORICAL PROJECTS PAGE 2 OF 2

	S Schwartz Urban Impact Award (41)	GATES FOUNDATION COMMON CORE (45)	IN-KIND COMMON CORE (45-IK)	GATES FOUNDATION ELL GRANT (47)	GATES FOUNDATION ELL MATERIALS (47-A)	GATES FOUNDATION KPI GRANT (48)	WALLACE FOUNDATION GRANT (51/52)	1ST QTR TOTALS (7/1/14-9/30/14)
OPERATING REVENUE								
MEMBER DUES SPONSOR CONTRIBUTION GRANTS & CONTRACTS INTEREST REGISTRATION FEES SALE OF PUBLICATION	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$0.00 \$177,500.00 \$0.00 \$0.00 \$256,625.00 \$0.00
TOTAL REVENUE	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$434,125.00
OPERATING EXPENSES								
SALARIES & FRINGE BENEFITS OTHER INSURANCE TRAVEL AND MEETING EXPENSES GENERAL SUPPLIES DUES, SUBSCR & PUBLICATION COPYING & PRINTING	\$0.00 0.00 0.00 0.00 0.00 0.00	\$171,468.77 0.00 8,642.16 0.00 297.00 1,800.34	\$42,424.21 0.00 0.00 0.00 0.00 0.00	\$22,175.65 0.00 34.28 0.00 503.22 0.00	\$24,713.16 0.00 9,308.98 0.00 0.00 297.47	\$7,858.34 \$0.00 \$0.00 \$0.00 \$255.33 \$0.00	\$0.00 0.00 0.00 0.00 0.00 0.00	\$363,638.14 \$0.00 \$314,907.97 \$0.00 \$1,055.55 \$3,889.61
OUTSIDE SERVICES PARTICIPANT SUPPORT COST TELEPHONE POSTAGE & SHIPPING EQPT LEASE MAINT & DEP	0.00 0.00 0.00 0.00 0.00	27,621.22 0.00 67.27 211.75 0.00	0.00 0.00 0.00 0.00 0.00 0.00	11,052.55 0.00 33.57 29.44 0.00	57,210.51 0.00 0.00 0.00 0.00	\$0.00 \$40,707.31 \$0.00 \$95.24 \$0.00 \$0.00	0.00 0.00 0.00 0.00 0.00	\$3,889.61 \$351,206.61 \$0.00 \$297.14 \$3,485.18 \$0.00
OFFICE RENT & UTILITIES EXPENSES ALLOCATED TO PROJECTS	0.00 0.00	0.00 31,516.28	0.00 6,363.63	0.00 5,074.31	0.00 13,729.52	\$0.00 7,337.43	0.00 0.00	\$0.00 \$129,197.12
TOTAL PROJECT EXPENSES	\$0.00	\$241,624.79	\$48,787.85	\$38,903.02	\$105,259.63	\$56,253.65	\$0.00	\$1,167,677.32
REVENUE OVER EXPENSES	\$0.00	(\$241,624.79)	(\$48,787.85)	(\$38,903.02)	(\$105,259.63)	(\$56,253.65)	\$0.00	(\$733,552.32)
CLOSEOUT OF COMPLETED PROJECTS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
IN-KIND CONTRIBUTION	\$0.00	\$0.00	\$48,787.85	\$0.00	\$0.00	\$0.00	\$0.00	\$48,787.85
CARRYOVER BALANCE 6/30/14	\$19,926.50	\$782,392.93	\$0.00	\$66,396.91	\$486,896.13	\$303,198.85	\$444,503.67	\$5,274,965.42
ENDING BALANCE 9/30/14	\$19,926.50	\$540,768.14	\$0.00	\$27,493.89	\$381,636.50	\$246,945.20	\$444,503.67	\$4,590,200.95

STRATEGIC AND SUCCESSION PLANNING

STRATEGIC AND SUCCESSION PLANNING PROJECT SUMMARY

The Council of the Great City Schools Strategic and Succession Planning Project

In January 2011, the Council of the Great City Schools hired the Parthenon Group to conduct a review of the organization's context and mission, programmatic work and strategies, organizational and financial requirements, and succession planning needs. The strategic and succession planning project spanned 9 weeks, and involved:

- Over 40 qualitative interviews with staff, current members (superintendents and school board members) and former members, and
- Five separate surveys (district leadership and four line management groups) yielding 214 responses.

Major findings

- ➤ The Council's goals align with what districts leaders have identified as the most pressing needs within their districts.
- ➤ Overall satisfactions levels with the Council's services are high across the board.
- ➤ District Leaders and Line Managers suggested a few potential service improvement opportunities for the Council to consider in the future, including:
 - more best practice identification and proactive sharing of these practices,
 - crisp summaries of "what works" (what accounts for superior performance in some districts),
 - faster turnaround on reports through either adding more resources to focus on report writing or through shortening reports,
 - institutionalizing operational activities,
 - development of common academic performance indicators, and

- more strategic communications targeted to the broader public on behalf of urban public schools.
- ➤ These "opportunities for improvement" have some resource implications, including additional investments and up to four additional full time employees. Implementing all proposed changes would require \$386K in additional Council funds annually.
- ➤ Possible sources for incremental funds include reallocation within the existing budget, raising new funds through grants, increasing membership revenue, and finding new sources of revenue (such as productizing KPIs or common core tools, or offering leadership development training).

Succession Planning

- The Executive Committee should consider three possible scenarios: an **emergency** situation where a new Executive Director needs to be hired in under a year, a **short-term** situation where a new Executive Director needs to be hired in one to three years, and a **medium-term** situation where an Executive Director needs to be hired in three to six years.
- ➤ There are three potential paths to hire an ED candidate into the Council: hire someone directly into the Executive Director position, hire someone into a Director position and groom that hire for the Executive Director position, and create a new Deputy Director position as a training position for Executive Director.
- ➤ Being transparent with staff and involving them in succession planning will strengthen the overall process and increase likelihood of staff staying on.
- ➤ Documentation of existing processes at the "enterprise" and "functional" levels will enable a smoother transition and help institutionalize practices.