

COUNCIL OF THE GREAT CITY SCHOOLS

BOARD OF DIRECTORS MEETING

MARCH 20, 2016

WASHINGTON D.C.

COUNCIL OF THE GREAT CITY SCHOOLS
Board of Directors Meeting
March 20, 2016
Washington, D.C.

AGENDA

CONVENE 8:30 AM

A. Introduction and Quorum Call

- o Executive Committee Members.....5
- o Board of Directors and Member Districts.....6
- o Council Staff8

B. Minutes

- o Board of Directors Meeting of October 10, 201510
- o Executive Committee Meeting of January 22-23, 2016.....17

C. Committee-of-the-Whole

- o Nominations.....25
- o Conferences and Meetings.....32
- o Communications48
- o Legislation.....214
- o Research.....260
- o Task Force on Achievement391
- o Males of Color Initiative465
- o Task Force on Professional Development591
- o Task Force on English Language Learners, and Bilingual Education.....593
- o Task Force on Leadership, Governance, and Management.....626
- o Task Force on Finance.....779

D. Report of the Executive Committee

- o Audit Subcommittee795
- o By-Laws Subcommittee.....846
- o Membership Subcommittee857
- o Office Move.....867

ADJOURN 12:00 Noon

ABOUT THE COUNCIL

COUNCIL OF THE GREAT CITY SCHOOLS

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.

COUNCIL OF THE GREAT CITY SCHOOLS

Executive Committee

2015-2016

OFFICERS

Chair of the Board: Richard Carranza, San Francisco Superintendent
Chair-Elect: Felton Williams, Long Beach School Board
Secretary/Treasurer: Kaya Henderson, District of Columbia Chancellor
Immediate Past-Chair: Jumoke Hinton Hodge, Oakland School Board

MEMBERS

Thomas Ahart, Des Moines Superintendent
Jose Banda, Sacramento Superintendent
JoAnn Brannon, Metro Nashville School Board
Juan Cabrera, El Paso Superintendent
Marnell Cooper, Baltimore School Board
Paul Cruz, Austin Superintendent
Darien Driver, Milwaukee Superintendent
Doretha Edgecomb, Hillsborough County School Board
Lawrence Feldman, Miami-Dade County School Board
Eric Gordon, Cleveland CEO
Michael Hanson, Fresno Superintendent
Barbara Jenkins, Orange County Superintendent
Pam Knowles, Portland School Board
Michael O'Neill, Boston School Board
Ashley Paz, Fort Worth School Board
Valeria Silva, St. Paul Superintendent
Paula Wright, Duval County School Board
VACANT
VACANT
VACANT

Ex Officio

Deborah Shanley, Brooklyn College CUNY Dean

COUNCIL OF THE GREAT CITY SCHOOLS
Board of Directors (as of March 8, 2016)

CITY	SUPERINTENDENTS	BOARD MEMBERS
Albuquerque	Raquel Reedy	Don Duran
Anchorage	Ed Graff	Pat Higgins
Arlington	Marcelo Cavazos	Jamie Sullins
Atlanta	Meria Carstarphen	Leslie Grant
Austin	Paul Cruz	Kendall Pace
Baltimore	Gregory Thornton	Marnell Cooper
Birmingham	Kelley Castlin-Gacutan	Wardine Alexander
Boston	Tommy Chang	Michael O'Neill
Bridgeport	Frances Rabinowitz	Sauda Baraka
Broward Co.	Robert W. Runcie	Laurie Rich Levinson
Buffalo	Kriner Cash	James Sampson
Charleston	Gerrita Postlewait	Cindy Bohn Coats
Charlotte-Mecklenburg	Ann Clark	Mary T. McCray
Chicago	Forrest Claypool	Jaime Guzman
Cincinnati	Mary Ronan	Melanie Bates
Clark County	Pat Skorkowsky	Linda E. Young
Cleveland	Eric Gordon	Denise Link
Columbus	Daniel J. Good	Gary Baker II
Dallas	Michael Hinojosa	Mike Morath
Dayton	Lori L. Ward	Ronald C. Lee
Denver	Tom Boasberg	Allegra Haynes
Des Moines	Thomas Ahart	Cindy Elsbernd
Detroit	Alycia Meriweather (Interim)	N/A
El Paso	Juan Cabrera	Dori Fenenbock
Fort Worth	Kent P. Scribner	Ashley Paz
Fresno	Michael Hanson	Lindsay Cal Johnson
Guilford County	Maurice Green	Rebecca M. Buffington
Hawaii Department of Education	Stephen Schatz	Donald G. Horner
Hillsborough County	Jeff Eakins	Doretha Edgecomb
Houston	Kenneth Huewitt (Interim)	Anna Eastman
Indianapolis	Lewis Ferebee	Samuel Odle
Jackson	Cedrick Gray	Beneta Burt
Jacksonville	Nikolai P. Vitti	Paula Wright
Jefferson County	Donna Hargens	Diane Porter
Kansas City	Allan Tunis (Interim)	Airick West
Long Beach	Christopher Steinhauser	Felton Williams
Los Angeles	Michelle King	Steve Zimmer
Miami-Dade County	Alberto Carvalho	Lawrence Feldman
Milwaukee	Darienne Driver	Michael Bonds
Minneapolis	Michael Goar (Interim)	Don Samuels
Nashville	Chris Henson (Interim)	JoAnn Brannon
Newark	Christopher Cerf	Antoinette Baskerville- Richardson
New Orleans	Henderson Lewis Jr.	N/A
New York City	Carmen Fariña	N/A
Norfolk	Melinda Boone	Rodney Jordan
Oakland	Antwan Wilson	Jumoke Hinton Hodge
Oklahoma City	Rob Neu	Phil Horning
Omaha	Mark A. Evans	Lacey Merica

Orlando
Palm Beach County
Philadelphia
Pittsburgh
Portland
Providence
Richmond
Rochester
Sacramento
St. Louis
St. Paul
St. Petersburg
San Antonio
San Diego
San Francisco
Santa Ana
Seattle
Shelby County (Memphis)
Toledo
Tulsa
Washington, D.C.
Wichita

Barbara Jenkins
Robert Avossa
William R. Hite, Jr.
Linda Lane
Carole Smith
Christopher Maher
Dana Bedden
Linda Cimusz (Interim)
Jose L. Banda
Kelvin Adams
Valeria Silva
Michael Grego
Pedro Martinez
Cindy Marten
Richard Carranza
Richard Miller
Larry Nyland
Dorsey E. Hopson, II, Esq.
Romules L. Durant
Deborah Gist
Kaya Henderson
John Allison

William Sublette
Marcia Andrews
Marjorie G. Neff
Thomas Sumpter Jr.
Pam Knowles
Nicholas Hemond
Jeffrey Bourne
Van Henri White
Christina Pritchett
Rick Sullivan
Jon Schumacher
Peggy O'Shea
Patti Radle
Michael McQuary
Jill Wynns
Rob Richardson
Harium Martin-Morris
Kevin Woods
Chris Varwig
Lana Turner-Addison
N/A
Jeff Davis

COUNCIL OF THE GREAT CITY SCHOOLS

Staff

Michael Casserly, Executive Director
Teri Trinidad, Director of Administration, Finance & Conferences
Alisa Adams, Finance Manager
Marilyn Banks, Administrative Assistant
Terry Tabor, Conference Manager
Shirley Lathern, Systems and Administrative Specialist
Angel Gooch, Administrative and Conference Specialist
Jeff Simering, Director of Legislation
Julie Beth Halbert, Legislative Counsel
Manish Naik, Legislative Manager
Gabriela Uro, Director 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
Ashley Ison, Research Intern
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
LONG BEACH, CA
OCTOBER 10, 2015**

Richard Carranza, Chair of the Board of Directors, called the meeting to order at 8:45 am. Present members introduced themselves, and a quorum was established.

Minutes

Richard Carranza presented the minutes of the March 15, 2015 meeting of the Board of Directors at the Legislative Conference in Washington, DC, and the July 17-18, 2015 meeting of the Executive Committee in San Francisco, CA. A motion to approve the minutes passed by voice vote.

Annual Reports

The board materials included both the organization's annual report as well as individualized city-by-city reports that detailed membership benefits and services provided directly to each district in 2014-15.

A motion to approve the Annual Report passed by a voice vote.

Conferences and Meetings

Michael Casserly, the organization's executive director, presented the meeting lineup for the remainder of 2015 and for next year. Next year the annual conference will be hosted by Miami-Dade County, October 19-23, and will be the Council's 60th annual conference. The 2017 annual conference will be held October 18-22 in Cleveland, and the 2018 annual conference will be held October 24-28 in Baltimore. The organization is still working to secure a host city for 2019, although the Council has received a preliminary bid from Louisville.

Legislation

Jeff Simering, the Council's director of legislation, updated the board on legislative developments in Washington. He described the short term Continuing Resolution (CR) in place through mid-December, at which point Congress will need to finalize spending levels for FY 2016 (school year 2016-17) or approve another extension. The CR currently has a slight budget cut attached to it, although Simering indicated that the final bill might have modest funding increases

Simering described a number of other pending federal financial deadlines, including extension of the federal debt ceiling, the federal highway reauthorization, and the annual tax extenders legislation. Simering indicated that there was some chance of another legislative showdown in Congress at the end of the year.

Simering indicated that there was some feeling of urgency by both House and Senate chairs to finish the reauthorization of ESEA before Congress moved into an election year when it would be more difficult to pass. The ESEA bills under consideration are both lengthy, but are aimed at adding some flexibility at the state and local levels. For districts without waivers, a new bill will likely be better than NCLB. But for districts with waivers, it is unclear that a reauthorized ESEA will improve anything, given all the requirements. In addition, the threat inherent in a re-calculated Title I funding formula remains. The proposed formula that was being considered in the House, for example, would cost urban districts upwards of \$600 million.

Child nutrition and school meal reauthorization will also constitute another battle between Democrats and Republicans, and both the House and Senate are poised to begin consideration of their bills.

Finally, there is considerable political uncertainty with Speaker Boehner stepping down, and what it will mean for the reauthorization of ESEA and the budget. Questions and discussion followed.

Communications

Casserly reviewed all statements and press releases of the Council since the last board meeting, as well as a sample of recent articles and editorials. He invited board members to let us know if our media outreach or editorializing was not reflecting member interests or positions. Everyone agreed that the right tone was being set.

Board materials also included communications and information tools around the common core. The Council's latest three-minute PSA was released in January, and it has now been seen over 125 million times since then. The PSAs have been particularly popular in Spanish language media outlets. Usage reports for this and other tools were provided in the materials, along with a list of awards the organization has received for these materials.

The Board of Directors materials also included a report on the structure and staffing of public relations/communications offices across districts, along with staffing descriptions and funding information for this function. This report provides cross-district data so that districts can compare their communications operations to other large urban districts.

Finally, the materials included the latest edition of *The Urban Educator* and provided information on the Bernard Harris Scholarships. Henry Duvall, the Council's communications director, urged board members to encourage minority students in their districts to submit applications.

Research

The Board of Directors materials also provided information on the Trial Urban District Assessment of NAEP. The latest results will be announced on October 28—and for the first time results for both states and districts will be released at the same time.

Moreover, the board materials included the Council's final draft report on testing. Casserly reminded the group that this survey and report was initiated by the board at its Albuquerque meeting two years ago. The board's purpose was to provide greater clarity on the testing landscape across our districts. The executive committee reviewed early findings back in July. The executive committee requested that the report focus on aggregated results only, and not provide data for individual cities. Casserly then reviewed the report's structure and key findings, including the number and purpose of tests administered across member districts.

Board members then discussed the findings in detail and how to message it. A number of concerns, questions, and suggestions were raised about the draft press release. Members indicated that it contained very strong language that staff might want to revisit in order to prevent unintended consequences. Members also suggested being very clear about our next steps. All agreed that the report needed to be presented in an even-handed fashion and that everyone needed to be prepared.

The scheduled date for release is October 20. The Council will start reaching out to the communications offices of member districts immediately following this meeting to provide preliminary information, guidance, and to formulate a strategy for dealing with press questions.

A motion to approve the report and to move forward with its release passed by a voice vote. There was not dissent.

Males of Color Initiative

The board materials included the Council's pledge on black male achievement, along with a list of districts that have developed implementation plans to accompany their pledge and a summary table laying out various features of these plans. Casserly encouraged members to continue sending in their implementation plans.

Moving forward, the Council received a grant from The Gates Foundation to help support this work on males of color, which in addition to launching a website will include developing a toolkit of resources, profiling success stories, and hosting webinars to provide technical assistance around males of color efforts.

Julie Wright Halbert then announced a webinar on legal issues surrounding services to males of color that will be held in the coming weeks. Council staff will be sending out more information on this soon.

Achievement Task Force

Eric Gordon, the Cleveland superintendent, gave the report of the Achievement Task Force. This included updates on the Gates Foundation working group project, which involves developing a tool to help districts gauge their implementation of common core standards. Task force members reviewed the draft materials and offered their feedback.

The task force also looked at the 58 academic KPI indicators that have been culled from the original set of over 200. These are largely predictive indicators designed to show that instructional units are heading in the right direction. They also incorporate some cost indicators, as well as achievement indicators specific to males of color and linked to the Council's males of color pledge. Task force members were asked to indicate which were most important in order to further cull the list to roughly 30.

Finally, at the Achievement Task Force meeting, Council staff announced an upcoming convening of principal supervisors in Broward County in May 2016, as well as the development of a new GIMET mobile app to help users gather evidence on whether instructional materials are consistent with the common core.

Professional Development Task Force

Deb Shanley, Brooklyn College Dean, gave the report of the Professional Development Task Force. Echoing the report of Eric Gordon, Shanley called the group's attention to the tools developed by the second working group on district implementation of the common core. These implementation indicators included professional development indicators and data on the money districts were devoting to professional development activities.

Bilingual Task Force

Gabriela Uro, the Council's director of bilingual policy, gave the report of the Bilingual Task Force. The majority of the task force meeting was devoted to updating the group on the Council's various English language learner projects, including the effort to improve English language arts instructional materials for ELLs. The Council has been providing publishers with very specific feedback to help them incorporate more rigorous grade-level content and more complex texts for ELLs. The result of the initiative is that more publishers are now starting to revise their materials and show interest in working with us on a second round.

The Council is now starting the second phase of this project, which will be looking at ELL materials in math. At the conference, a group of experts and practitioners to develop math instructional materials standards for students with disabilities and ELLs met to conduct initial planning.

In addition, the Council is exploring the possibility of creating a mechanism for joint buying agreements in an effort to push the market and exert pressure on publishers to create higher quality ELL materials. This work will be funded under the new Gates Foundation grant.

The task force also discussed a project funded by the Helmsley Foundation to create a virtual professional development platform for enhanced professional development aligned to the common core standards for teachers of ELLs and struggling students.

Manish Naik then briefed the task force on ELL provisions in the draft ESEA reauthorization that would require states to determine a timeframe by which ELLs would be proficient in English.

Leadership, Management, and Governance Task Force

Airick West, Kansas City school board member, updated the group on the Council's school board governance work. The work began with a review of the literature, and from this review staff, superintendents, and school board members built detailed surveys—one for board secretaries, superintendents, and board members. The results show some areas of convergence and some areas of divergence. West then reviewed key findings. Discussion followed.

The Council's annual Managing for Results report was also released at the meeting, and Bill Isler asked Jon Lachlan Hache to review key findings.

Finance Task Force

Tom Ahart, Des Moines superintendent, gave the task force report. He indicated that a new round of finance award applications were now available.

Membership

The board welcomed new members of the Council from Arlington and San Antonio (Texas).

By-Laws

No report.

Audit

The budget for the 2014-15 program year was provided in the board of directors materials. Casserly summarized the status of the organization's budget. He also indicated that the external audit of the organization's budget was scheduled after Thanksgiving and would be available for the executive committee at its January meeting and to the full board in March. Casserly pointed out that there was a surplus, and explained to the group that this carryover was the result of grants that were being spent out over multiple years. The finances of the organization are in good shape and a clean audit is expected.

The materials also included the status of dues payments in FY14-15, which showed all members paid with the exception of New Orleans, which is permanently exempted. It also appeared that dues payments are on track for FY15-16. The materials included financial data for the first quarter of the current program year, starting July 1 and going through September 30, 2015. The organization had spent out roughly 20 percent of its revenues in the first quarter. Casserly informed the group that preliminary notification

was received that an additional \$1.6 million in grant funding from The Gates Foundation was recently approved.

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

In closing, the Board Chair thanked Council staff and the host city of Long Beach for a successful annual conference. Long Beach was given an enthusiastic round of applause from the board.

The Chair adjourned the meeting at 11:50 am.

Respectfully submitted:
Michael Casserly
Executive Director

EXECUTIVE COMMITTEE

**COUNCIL OF THE GREAT CITY SCHOOLS
MINUTES
EXECUTIVE COMMITTEE MEETING
EL PASO, TX
January 22-23, 2016**

Friday, January 22, 2016

Present:

Officers:

Richard Carranza, Chair, San Francisco Superintendent
Felton Williams, Chair-elect, Long Beach School Board
Jumoke Hinton Hodge, Immediate Past Chair, Oakland School Board

Members:

Tom Ahart, Des Moines Superintendent
Jose Banda, Sacramento Superintendent
JoAnne Brannon, Nashville School Board
Juan Cabrera, El Paso Superintendent
Paul Cruz, Austin Superintendent
Darienne Driver, Milwaukee Superintendent
Doretha Edgecomb, Hillsborough County School Board
Lawrence Feldman, Miami-Dade County School Board
Eric Gordon, Cleveland CEO
Barbara Jenkins, Orange County Superintendent
Michael O'Neill, Boston School Board
Ashley Paz, Fort Worth School Board
Deborah Shanley, Brooklyn College, CUNY Dean
Airick West, Kansas City (MO) School Board
Paula Wright, Duval County School Board

Absent:

Terry Grier, Houston Superintendent
Michael Hanson, Fresno Superintendent
Kaya Henderson, District of Columbia Chancellor
Pam Knowles, Portland School Board
Keith Oliveira, Providence School Board

Richard Carranza, Chair of the Board of Directors, called the meeting to order at 2:00 pm.
Present members introduced themselves and a quorum was established.

Minutes

Richard Carranza presented the minutes of the October 8, 2015 meeting of the Executive Committee and the October 10, 2015 meeting of the Board of Directors at the Annual Conference in Long Beach, CA. A motion to approve the minutes passed by voice vote.

Nominations

There are two vacancies on the Executive Committee as a result of Bolgen Vargas, Rochester Superintendent, and Bill Isler, Pittsburg School Board Member, stepping down as of December 31, 2015. Board Chair Carranza nominated Valeria Silva, St. Paul Superintendent, and Marnell Cooper, School Board Member from Baltimore, to fill these vacancies.

The organization's by-laws require a balanced committee, and the chart included in the committee materials provided a breakdown of its current composition. Three additional vacancies will come up as of the March meeting, at which time the committee will need to increase its number of female members and representation from eastern districts.

Approval of the two Executive Committee nominations passed by voice vote.

Membership

Two districts have applied for membership. One was a previous member—Tulsa. The district meets all Council eligibility criteria.

The second applicant is Pinellas County (FL). The district also meets all membership criteria. Committee members, including three representatives from Florida districts, all spoke in favor of Pinellas County, citing the similarity of challenges faced and the district leadership's commitment to reform and improvement.

A motion to accept both Tulsa and Pinellas County as new members passed by voice vote. The committee also recommended that we revisit all recent applicants denied membership at previous meetings.

By-Laws

No report.

Audit

A draft of the external audit report for the 2014-15 program year was provided in committee materials. Once again, the organization had a completely clean audit, with no findings, no exceptions, and no material weaknesses. The materials provided a breakdown of assets/liabilities. Michael Casserly, the organization's executive director, pointed out that there is a substantial surplus, and explained to the group that this large carryover was the result of grants that are being spent out over multiple years.

Committee materials provided a breakdown of restricted and temporarily restricted funds. Again, this data illustrated the spend-down rate in the organization's revenues over time. Additional grants have been received since the audit period, meaning that the revenue base will appear to increase again.

In response to a question about the rotation of auditors, Teri Trinidad, the organization's director of administration and finances, informed the group that the auditing company rotates its field auditors who do the work on the Council's books every few years.

In reviewing the budget, the group also discussed the nonpayment among colleges of education. Deb Shanley welcomed any input or ideas members had to build greater engagement of the group in the Council. One suggestion was to produce a summary of benefits of membership that could be circulated to the Deans group.

Casserly then reviewed the status of district dues payments, and encouraged members to make sure they were up-to-date with payments. He then called the group's attention to the fact that member dues will go up by half a percent next year.

Casserly then reviewed the remainder of the materials in the audit section, including the status of budget expenditures for FY15-16 through December 31, 2015. He also presented the Proposed Budget for FY2016-2017, which will go before the board for approval at the March meeting. In closing, he thanked Teri Trinidad for her stewardship of the organization's finances.

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

Conferences and Meetings

Casserly reviewed the evaluations of the 2015 annual conference in Long Beach. In general, the reviews were overwhelmingly positive. Casserly then presented the meeting lineup for 2016. He indicated that the President has been invited to speak at both the legislative and annual conferences. Michael O'Neill, Boston school committee member, then discussed the upcoming summer Executive Committee meeting scheduled for July 15 and 16, 2016 in Boston, MA.

The 2016 annual conference will be held in Miami-Dade County, and information on the hotel and a call for presentations was included in committee materials. One committee member requested that special consideration be paid to sessions of interest to school board members. Other members suggested forums with students, as well as good representation from districts across the country.

Hotel information for the 2017 annual conference in Cleveland was provided in the committee materials, as well as information about the 2018 conference in Baltimore. The committee then reviewed a bid from Louisville to host the conference in 2019.

A motion to hold the 2019 annual conference in Louisville, KY passed by voice vote.

Communications

Casserly started the discussion on Council communications by asking the committee two broad questions. First—are we communicating in a way that reflects your needs and priorities? Second, did we handle communications around the recent testing report in a way that met your needs and expectations?

Casserly then reviewed sample articles, press releases, and official statements that have been released over the past few months. The communications materials included a separate section of sample coverage of the Council’s recent testing report. Members expressed their support and pride in the Council’s communications work in general, and messaging/outreach around the testing report in particular.

Casserly then reviewed the remaining materials, including usage statistics on various common core implementation and public outreach tools, the new 60th anniversary logo, the latest edition of the *Urban Educator*, and a list of Council activities in 2015 that was delivered at the Council’s Christmas luncheon.

Friday, January 22, 2016

Legislation

Jeff Simering, the Council’s legislative director, and Manish Naik, the group’s legislative manager, briefed the committee on legislative issues and developments, starting with the recently approved two-year budget agreement that increased domestic spending, including an increase in education spending.

Simering and Naik then moved to the recently reauthorized ESEA. The bill did not include any of the most damaging provisions, like a change in the Title I formula that would have resulted in substantial decreases in funding for member districts. In addition, the new authorization did not include language on portability or language that would have allowed states to cut education funding without federal repercussions.

Legislative staff also indicated that ESSA eliminated many of the more burdensome NCLB provisions, although the new legislation added others. Questions followed on the transition period, school year 2016-17, and on when everything in the law became effective.

Discussion proceeded on the bill’s provisions related to educational standards, teacher evaluations, accountability, low-performing schools, sub-group reporting, assessments, and other provisions. Committee materials included a detailed summary prepared by Council staff summarizing the legislation.

Research

An overview of Council research activities was provided in committee materials. This overview was followed by information on the expansion of the Trial Urban District Assessment. Over the past year, the Council worked with appropriations committee staff to further expand the program in order to accommodate new districts. A list of eligible

districts was included in the materials, along with an invitation letter. Response are due on February 5.

Casserly then asked if there were additional areas of study members were interested in the Council pursuing.

Members suggested additional research in the areas of—

- Structural imbalances in funding
- Facilities and the support of facilities repairs and renovations
- Teacher evaluations and their effects across the membership
- Effects of teacher race on student achievement
- State legislative erosion of district leadership and authority in running schools
- Charter schools and charter school results and accountability
- A survey of ethnic studies programs in the member districts
- Early childhood education and how they are funded
- Other topics

Extensive discussion followed on the draft NAEP data on charter schools. A suggestion was made to conduct the analysis by state since laws differed substantially state-by-state and by authorizer.

Males of Color Initiative

The committee materials included a copy of the Council's Males of Color pledge, along with a partnership letter with the College Board. Casserly then unveiled and described the Council's new males of color website--malesofcolor.org. Casserly showed the members the website, and walked everyone through the site's various features.

Casserly then focused on the Key Performance Indicators (KPIs) corresponding to elements of the pledge. In general, this constituted a two-fold accountability system we all committed to—which entails both the collection of implementation plans and evidence of progress on the indicators. The Council will be collecting data on the 2013-14 and 2014-15 school years to see whether we've seen any movement on the indicators since we made the pledge. Data collection will begin in a matter of weeks.

Achievement

Eric Gordon gave the report of the achievement task force. He informed the group that the Council had received a new grant from The Bill and Melinda Gates Foundation, and walked the group through the five main areas of work this grant will support. He also gave an update on the Council's efforts to collect and disseminate academic KPIs. Finally, the committee materials included a draft of the Working Group II common core implementation indicators.

Casserly asked the group whether they wanted the Council to continue to focus on providing support and tools around common core standards implementation, or whether

we should shift our focus to other issues. Committee members agreed that common core implementation was still a leading need and priority.

Casserly then informed the group that the Council was being pursued by OER—the Open Educational Resources group—and asked for additional guidance on when to partner and when not to partner with external organizations. Members agreed that when the benefits of a partnership are largely one sided, then there was no reason for the Council to pursue it.

Professional Development

No report.

Bilingual Education

There were a number of large projects being undertaken in this area. To begin, the team’s work on raising the quality of instructional materials for ELLs continues. Casserly recounted the process of narrowing the field of publishers who were willing to produce high quality, standards-aligned ELA materials for ELLs. The two publishers who remained a part of the project are now building out their materials to more grades. In addition, the math component is now underway.

Second—work continues on professional development tools for teachers aimed at improving ELL instruction through a grant from the Helmsley Foundation. We are in the process of identifying the model classrooms/teachers, and filming lessons.

Third—the Council is taking the work we did around instructional materials and expanding it into a joint buying protocol for materials that meet the criteria we have developed. A list of districts we plan on contacting regarding participation in a pilot is provided in the materials. Casserly asked if anyone else was interested in participating, and El Paso, Sacramento, Austin, Milwaukee, Long Beach, and Cleveland voiced interest.

Leadership, Governance, and Management

The preliminary analysis of the Council’s school board survey was provided in committee materials. We now have around 70 percent of member districts responding with at least two school board members, along with 55 superintendents. Council staff is combing through the data to identify the most salient findings, although we are already using some data from the survey to drive our work with school boards.

Airick West, Kansas City school board member, then described some of the Council board visits, and asked JoAnn Brannon, Nashville school board member, to share her experience as one of the district school boards to have worked with the Council team. The group then discussed the importance of sustaining and growing the work moving forward.

In the future, the work could expand to include new board member—and new board chair— training. This cohort training would help provide a support network for these leaders, as well as professional development. Also, the project might develop a board self-

assessment. The overarching aim with this work is to address the churn in district leadership and the rancor in relationships between some boards and district leaders.

Finance

No report. A copy of the financial excellence award application is provided in the materials.

Office Move

Casserly then discussed the Council's upcoming office move. The organization will be moving to the building right next door to where it is now—located at 1331 Pennsylvania Avenue. At this point we have signed the lease and are in the design phase of the project. The build-out will most likely begin in late March, and we will move in June.

We have budgeted very carefully—we will be paying a dollar less per square foot, although the group will be securing more room. Casserly thanked Teri Trinidad for her work brokering the deal.

New Business

Regarding the recent spate of bomb threats in various school districts, Casserly informed the group that the Council has collected copies of the parent and community outreach conducted, which is available to anyone who is interested. Members discussed expanding this into a toolkit for addressing various emergency situations.

The Chair adjourned the meeting at 2:25 pm.

Respectfully submitted:

Michael Casserly
Executive Director

NOMINATIONS

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on Nominations

2015-16

Goal: To ratify slate of Officers, to nominate an individual for Secretary/Treasurer, to renew or replace incumbents whose terms on the Executive Committee are expiring and to fill vacancies on the Executive Committee.

Chair

Jumoke Hinton Hodge, Oakland School Board

Members

Tommy Chang, Boston Superintendent
Cedric Gray, Jackson Superintendent
Darienne Driver, Milwaukee Superintendent
Jose Banda, Sacramento Superintendent
Gary Baker II, Columbus School Board
Lacey Merica, Omaha School Board
Paula Wright, Duval County School Board

COUNCIL OF THE GREAT CITY SCHOOLS

Nominations

The Nominations Committee forwards the following nominations for Officers of the Council of the Great City Schools and members of the Executive Committee.

Officers

- 1) Be it resolved: That Felton Williams (Long Beach School Board) serve as Chair of the Board beginning July 1, 2016 and ending June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 2) Be it resolved: That Kaya Henderson (District of Columbia Chancellor) serve as Chair-Elect of the Board beginning July 1, 2016 and ending June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 3) Be it resolved: That Larry Feldman (Miami Dade School Board) serve as Secretary/Treasurer of the Board beginning July 1, 2016 and ending June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 4) Be it resolved: That Richard Carranza (San Francisco Superintendent) serve as Immediate Past Chair of the Board beginning July 1, 2016 and ending June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

Renewal of Terms

- 1) Be it resolved: That Tom Ahart (Des Moines Superintendent) serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 2) Be it resolved: That Marnell Cooper (Baltimore School Board) serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 3) Be it resolved: That Pamela Knowles (Portland School Board) serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 4) Be it resolved: That Michael O'Neill (Boston School Board) serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 5) Be it resolved: That Valeria Silva (St. Paul Superintendent) serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 6) Be it resolved: That Paula Wright (Duval County School Board) serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

Vacancies

- 1) Be it resolved: That Cedrick Gray (Jackson Superintendent) fill the vacancy resulting from the expired term of Terry Grier (Houston Superintendent), whose term expires June 30, 2016. Cedrick Gray will serve a first three year term beginning July 1, 2016 and ending June 30, 2019.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 2) Be it resolved: That Allegra “Happy” Hayes (Denver School Board) serve the unexpired term of Airick West (Kansas City School Board), whose term expires June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 3) Be it resolved: That Michael Hinojosa (Dallas Superintendent) serve the unexpired term of Larry Feldman (Miami Dade School Board), whose term expires June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

- 4) Be it resolved: That Ronald Lee (Dayton School Board) serve the unexpired term of Keith Oliveira (Portland School Board), whose term expires June 30, 2017.

ACTION BY COMMITTEE

- Approved
 Not Approved

AFFIRMED

Chair of the Board

**Composition of Executive Committee
FY2015-2016 as of March 7, 2016¹**

Region	Male	Female	Board	Supt	Black	Hispanic	White	Other	Totals
East	3	0	2	1	1	0	2	0	3
Southeast	3	5	5	3	7	0	1	0	8
Midwest	4	4	2	6	2	4	2	0	8
West	4	1	2	3	1	2	2	0	5
Totals	14	10	11	13	11	6	7	0	24

¹ Including new members

CONFERENCES AND MEETINGS

**COUNCIL OF THE GREAT CITY SCHOOLS
2016 Conference Schedule**

Executive Committee Meeting

January 22-23, 2016
Hilton Garden Inn UTEP, El Paso, TX

HRD/Personnel Directors Meeting

February 9-12, 2016
Renaissance Hotel, Las Vegas, NV

Legislative/Policy Conference

March 19-22, 2016
Renaissance Mayflower Hotel, Washington, DC

Chief Operating Officers Conference

April 12-15, 2016
The Westin Hotel, Charlotte, NC

Bilingual Directors Meeting

May 11-14, 2016
The Lakefront Hotel, Anchorage, AK

Chief Information Officers Meeting

July 11-14, 2016
(Joint meeting with Curriculum & Research Meeting)
PGA National Resort & Spa, Palm Beach, FL

Curriculum & Research Directors' Meeting

July 11-14, 2016
(Joint meeting with CIO Meeting)
PGA National Resort & Spa, Palm Beach, FL

Executive Committee Meeting

July 15-16, 2016
Taj Boston Hotel, Boston, MA

Public Relations Executives Meeting

July 15-17, 2016
Marriott Downtown Hotel, Chicago, IL

Annual Fall Conference

October 19-23, 2016 at the Intercontinental Hotel in Miami, FL
October 18-22, 2017 at the Hilton Hotel in Cleveland, OH
October 24-28, 2018 at the Baltimore Marriott Waterfront in Baltimore, MD

Chief Financial Officers Conference

November 8 – 11, 2016
Hilton Palacio del Rio, San Antonio, TX

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: \$240/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.

TENTATIVE OFFSITE VENUES

Wednesday, October 19, 2016 Welcome Reception

Freedom Tower Miami



Originally completed in 1925 as the headquarters and printing facility for the newspaper *The Miami News*. The Miami News vacated the building in 1957 to relocate to a new facility on the [Miami River](#). As refugees from Cuba fleeing [Fidel Castro's](#) communist regime arrived in Miami during the 1960s, the [federal government](#) used the facility to process, document and provide medical and dental services for the newcomers. After the major era of refugees ended in 1972, the federal government sold the building to private buyers in 1974. In 1979, the building was listed on the National Register of Historic Places.

Friday, October 21, 2016 Dinner Cruise

Biscayne Lady Yacht





CALL FOR PRESENTATIONS

An Invitation to Present at the 60th Annual
Fall Conference of the Council of the Great City Schools in
Miami, FL

Urban schools have shown remarkable progress in the past few years; test scores are up, attendance rates are improving, and more students are taking college entrance exams. We invite you to submit a proposal for a 10 minute presentation on what's working for you to improve academic achievement for all students through efforts in one of the following areas:

- Improving Achievement and Closing Gaps in Urban Schools
- Urban School Professional Development
- Urban School Finance
- Urban School Leadership and Governance
- Bilingual Education Programs in Urban Schools
- Special Education Programs in Urban Schools
- Other Initiatives

SUBMITTING A PROPOSAL FOR PRESENTATION

It is our intent that the Annual Conference serves the membership by providing a forum for the presentation, consideration, and discussion of the needs of urban education. This year discussion groups and concurrent breakout sessions will be arranged to facilitate the exchange of information around increasing academic achievement in urban schools.

We invite you to submit a proposal for presentation that addresses how programs, initiatives and/or practices in the areas of closing achievement gaps, professional development, finance, leadership, and bilingual and special education programming are aligned and related to making a difference in improving academic achievement for all students. We are especially interested in receiving proposals that provide clear, convincing data that the program/initiative is effective in raising achievement and closing gaps between students in core academic subjects, such as reading, mathematics, science, and social studies. You may submit more than one program for presentation.

The title and the 75-100 word description should summarize and accurately reflect the content of what you are proposing for the session. As you develop your proposal, think about real and concrete results, what your urban colleagues most want to know, and how your session can be interactive and involve conference attendees in the session.

PRESENTER ELIGIBILITY

The Council asks that all proposals be approved by the appropriate district superintendent and/or college dean in order to be considered for presentation. Please be sure to check the appropriated box on the application form to confirm that the submitted proposal has been approved.

Additionally, we do not allow for-profit consultants, businesses, or organizations to make presentations at the conference. If one of our member districts would like to submit a proposal that speaks to a vendor's product, we will consider the proposal. If such a proposal is accepted, the presentation must be done by a staff member from the district and representatives from the company may not be on the panel.

PRESENTATION FORMAT

The format for presentations is one of concurrent sessions. Each session will include a panel comprised of one or more presenters from different districts or colleges of education or partner organizations presenting on similar topics. All concurrent sessions will be held on **Thursday, October 20th and Friday, October 21st**. Each session will run for approximately one hour and fifteen minutes. **Presenters are to limit formal presentations to approximately 10 minutes.** This will encourage discussion between the panelists and participants and maximize sharing of important ideas and information. All rooms will be arranged in conference-style to facilitate discussion.

ACCEPTANCE NOTIFICATION

The deadline for submitting a proposal is **April 8, 2016**. The receipt of all proposals will be acknowledged by e-mail within a week of submission. All correspondence will be sent to the presenter(s) acknowledged in the submitted proposals. Accepted and declined proposals will be acknowledged via e-mail by June 24, 2016.

STRAND DESCRIPTIONS

Presentations should be designed to help participants:

- Become more knowledgeable about quality programs and practices that promote student achievement
- Develop a deeper understanding of the principles for effective teaching and learning for all students

Priority in selection will be given to proposals that provide clear and convincing data demonstrating that the program/initiative is effective in raising student achievement.

1. **Improving Achievement and Closing Gaps**

This strand seeks proposals about research-based practices and interventions that are having an impact on learning in the core content areas, systemic levers that accelerate academic performance, effectiveness of accountability systems, and practices that can close the significant achievement gaps existing along racial, ethnic, gender, and economic lines.

2. **Urban School Professional Development**

Proposals submitted under this strand might address how different approaches to the recruitment, preparation, induction, and retention of qualified teachers, principals, and school site leaders have impacted student achievement. Of particular interest are proposals addressing methods for evaluating the effectiveness of professional development and individual teachers on student achievement.

3. **Urban School Finance**

Among the key issues that might be addressed in this strand are managing finances to deal with federal, state and local budget cuts, equitable distribution of funding, cost beneficial ways to allocate district resources to boost student achievement, and meeting special education costs.

4. **Urban School Leadership and Governance**

Critical topics that proposals in this strand might address are the recruitment and preparation of personnel for leadership roles, expanding the capacity of building leadership, role of board members, community relationships, and models of effective urban governance and management systems.

5. **Bilingual Education Programming**

Proposals in this strand might include programs that successfully improve student achievement, especially for recent immigrants, older students and long-term ELLs, comprehensive assessment strategies, and the development of curriculum that impact ELL student achievement.

3. **Special Education Programming**

Proposals in this strand might include programs that successfully improve student achievement, especially for students with mental, emotional and physical disabilities, comprehensive assessment strategies, and the development of curriculum that impact special education student achievement.

**Please submit your proposal online at www.cgcs.org
Or complete the attached form and submit by fax, email, or mail by April 8, 2016**

2016 PRESENTATION PROPOSAL FORM

Our urban district, college of education, or non-profit organization would like to make a presentation on ways in which we are improving student achievement through:

- Improving Achievement and Closing Gaps in Urban Schools**
- Urban School Professional Development**
- Urban School Finance**
- Urban School Leadership and Governance**
- Bilingual Programs in Urban Schools**
- Special Education Programs In Urban Schools**
- Other** _____

Title of presentation:

Name and title of person(s) submitting this presentation:

Name of urban school district, college of education, or organization:

Mailing Address:

Phone Number:

Fax Number:

Email Address:

Brief description of presentation (75-100 words):

- By checking this box you have acknowledged that your proposal has been approved by your superintendent or dean.**

Please submit your proposal online at: www.cgcs.org by April 8, 2016
or email to: myorkman@cgcs.org

FALL CONFERENCE 2017

COUNCIL OF THE GREAT CITY SCHOOLS

61st ANNUAL FALL CONFERENCE

**Hosted by the
CLEVELAND PUBLIC SCHOOLS
Cleveland, Ohio**

OCTOBER 18 - 22, 2017

CONFERENCE HOTEL:

Hilton Cleveland Downtown
100 Lakeside Avenue East
Cleveland, Ohio 44114
Phone: (216) 413-5000

**GROUP RATE: \$179/night for Single and Double Occupancy
Plus 16.5% tax**

The Convention Center Hotel, Hilton Cleveland Downtown, will connect the new Cleveland Convention Center, the Global Center for Health Innovation, and the downtown mall in a way that has never been done before. With this hotel, the Northeast Ohio region will be in a stronger position than ever to compete on a national and international stage. With the new Hilton Cleveland Downtown in place, the Cleveland Convention Center attendee experience will be world-class.

Hilton Hotels & Resorts, owned by Hilton Worldwide, will operate the hotel. The hotel will feature a 28-story tower filled with 600 guest rooms positioned atop a four-story podium of ballrooms, meeting space, retail space, and lobby. The hotel will feature a rooftop bar as well as underground connections to the Cleveland Convention Center and the Global Center for Health Innovation.

Situated on the site of the former Cuyahoga County Administration Building, the new Hilton Cleveland Downtown is scheduled to open by 2016.



FALL CONFERENCE 2018

COUNCIL OF THE GREAT CITY SCHOOLS

62nd ANNUAL FALL CONFERENCE

**Hosted by the
BALTIMORE CITY PUBLIC SCHOOLS
Baltimore, MD**

OCTOBER 24 - 28, 2018

CONFERENCE HOTEL:

Baltimore Marriott Waterfront
700 Aliceanna Street
Baltimore, MD 21202
(410) 385-3000

GROUP RATE: \$239/night for Single and Double Occupancy
Plus 15.5% tax

Raise your expectations. Then expect to exceed them. Marriott Baltimore Waterfront Hotel is located in the renowned Harbor East neighborhood. Just 15 minutes from BWI Airport, 5 minutes from Penn Station, 5 minutes from Camden Yards Light Rail Station, and 10 minutes to Baltimore passenger cruise ship terminal. A short ride or leisurely walk to the Baltimore Convention Center, Orioles Park at Camden Yards, Raven's M&T Bank Stadium, National Aquarium Baltimore, Fells Point, Little Italy and the Inner Harbor restaurants and shops.



FALL CONFERENCE 2019

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:

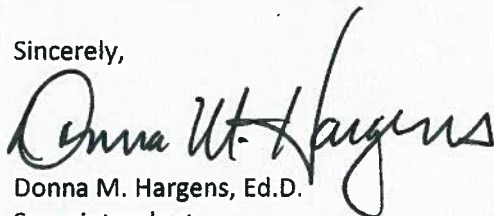
On behalf of the Jefferson County Public School (JCPS) District, I am very excited to submit this proposal to the Council of the Great City Schools to host the 2017, 2018, or 2019 Annual Fall Conference. The attendees will experience our city's unique brand of southern hospitality, spirit, and excitement 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

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:

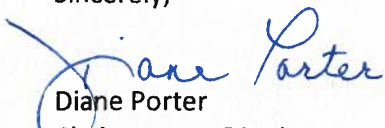
It is my pleasure to write a letter in support of the proposal being submitted to the Council of Great City Schools (CGCS) by the Louisville Convention & Visitors Bureau (LCVB) in collaboration with the Jefferson County Public School (JCPS) District to host the Great City Schools Fall Conference in 2017,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

COMMUNICATIONS

PRESS RELEASES



Council of the Great City Schools
1301 Pennsylvania Avenue, N.W. ♦ Suite 702 ♦ Washington, D.C. ♦ 20004
<http://www.cgcs.org>

EMBARGOED FOR RELEASE
October 28, 2015, 10 a.m., EST

CONTACT: Tonya Harris
(202) 393-2427 or tharris@cgcs.org

Large City Schools Hold Steady on National Test Amidst Nationwide Decline

Several Big-City Schools Make Substantial Gains

WASHINGTON, Oct. 28—Students in the nation’s large city public schools held steady in fourth- and eighth-grade reading and mathematics on the National Assessment of Educational Progress (NAEP) in the face of declining national scores in three of four subject and grade combinations.

The Nation’s Report Card: 2015 Mathematics and Reading Trial Urban District Assessment reveals that average mathematics and reading scores for students in large cities were stable in both grades 4 and 8, following an unbroken 10-year upward trend in urban student performance on the rigorous federal test from 2003 to 2013.

Notably, several individual big-city school districts showed substantial progress on NAEP, including the District of Columbia, Dallas, Miami-Dade County, Cleveland, Chicago, and Boston.

In addition, several cities have now caught up to the national average in at least one grade or subject after significantly trailing the nation in past years. For example, Boston has now caught up to the national public school average in eighth grade math and fourth grade reading after having been significantly behind on the 2003 NAEP assessment. Houston has now caught up to the nation in fourth grade math. And Miami-Dade County has now moved significantly ahead of the national average in fourth grade reading.

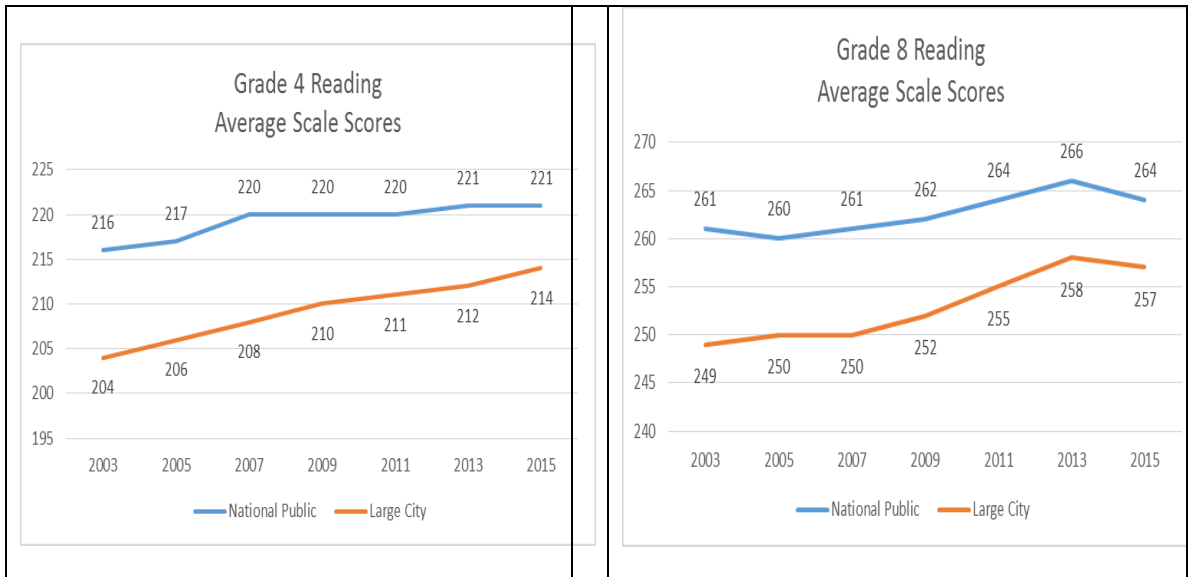
Three other urban school districts—Austin, Charlotte-Mecklenburg, and Duval County (Jacksonville, Fla.)—also had scores in the fourth and eighth grades that met or exceeded national averages in mathematics and reading.

“The last several years have been marked by significant transitions in academic standards, and schools always risk the possibility that short-term trends will dip as new instructional expectations and methods are put into place,” said Michael Casserly, Executive Director of the Council of the Great City Schools. “But, for the most part, the large cities defied the national odds, pursuing comprehensive instructional reforms and

standards-implementation efforts and showing remarkable stability—and even progress in a number of large urban school systems—on this rigorous national assessment.”

Reading Progress in Grades 4 and 8

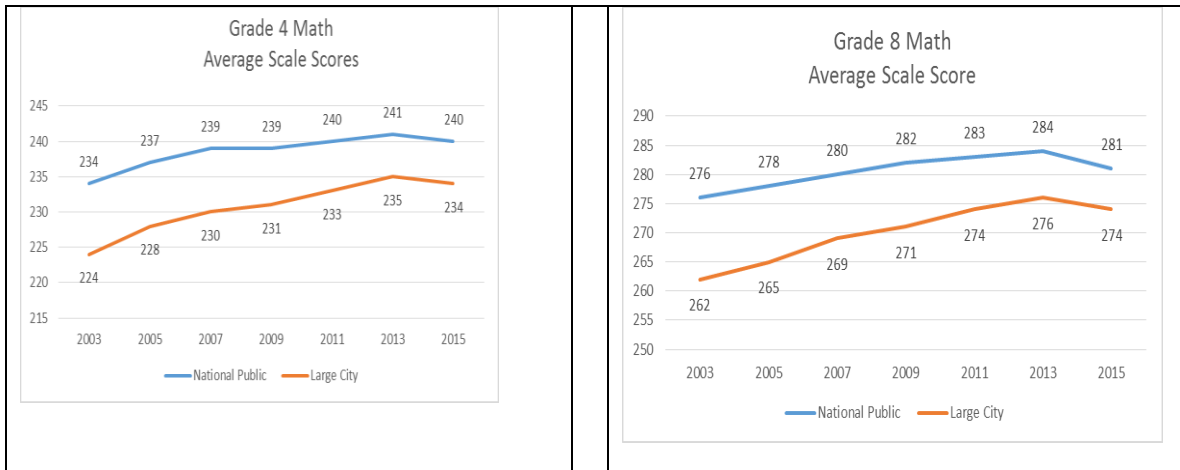
It is also noteworthy that the long-term progress of the nation’s large city public schools as a whole continues to narrow the achievement gap with the nation in reading. Between 2003 and 2015, large city public schools narrowed this gap in fourth grade reading from 12 scale score points to eight, a reduction of 33.3 percent. And in eighth grade reading, large city public schools reduced the gap from 13 points to seven, a decrease of 46.2 percent.



Source: U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress (NAEP)

Mathematics Progress in Grades 4 and 8

Similarly, between 2003 and 2015 large city public schools narrowed the gap in mathematics achievement in the fourth grade from 10 scale score points to six, a reduction of 40 percent. And in eighth grade, large city public schools reduced the gap from 14 points to eight, a decrease of 42.9 percent.



Source: U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress (NAEP)

Progress of Black and Hispanic Students

Over the years, large city school systems have shown progress on a number of fronts with their African American and Hispanic students, particularly males of color—

- Between 2002 and 2015, fourth grade reading scores among African American males in the nation’s large cities improved 12 scale score points, while scores among African American males nationwide went up eight.
- Over the same 2002 to 2015 period, fourth grade reading scores among Hispanic males improved by ten scale score points in the nation’s large city public schools compared to an increase of eight points nationwide.
- Between 2002 and 2015, eighth grade reading scores among African American males in the nation’s large cities increased by six points while scores among African American males nationwide did not change significantly—up only two points. Moreover, between 2013 and 2015 scores for African American students in large cities remained flat while nationwide scores dropped significantly by two points.

District Participants in TUDA

Twenty-one large urban school districts volunteered to participate for the 2015 urban NAEP, with Florida’s Duval County in Jacksonville participating for the first time. The other districts are Albuquerque, Atlanta, Austin, Baltimore City, Boston, Charlotte-Mecklenburg, Chicago, Cleveland, Dallas, Detroit, District of Columbia, Fresno, Hillsborough County in Tampa, Houston, Jefferson County in Louisville, Los Angeles, Miami-Dade, New York City, Philadelphia, and San Diego.



Council of the Great City Schools
1301 Pennsylvania Avenue, N.W. ♦ Suite 702 ♦ Washington, D.C. ♦ 20004
<http://www.cgcs.org>

FOR IMMEDIATE RELEASE

CONTACT: Tonya Harris

October 24, 2015

tharris@cgcs.org / 202-393-2427

STUDENT ASSESSMENTS IN PUBLIC SCHOOLS NOT STRATEGIC, OFTEN REDUNDANT

***Students Devoting up to 25 Hours per Year to Taking Mandated Tests;
Assessments Required by Congress, U.S. Department of Education,
States and School Districts Add Up in Time***

WASHINGTON, D.C., Oct. 24, 2015 – The average student in America’s big-city public schools will take roughly 112 mandatory standardized tests between pre-kindergarten and high school graduation, a new study shows.

The average of roughly eight standardized tests per year consumes between 20 and 25 hours each school year and frequently produces overlapping results. There were about 401 test titles being used in the nation’s largest urban school systems in the 2014-15 school year and students sat over 6,500 times for tests across the 66 school systems studied, the research found.

[The two-year study](#), believed to be the most comprehensive ever undertaken to ascertain the true extent of mandatory testing in the nation’s schools, was conducted by the [Council of the Great City Schools](#) at the request of its board of directors, which wanted a full picture of the testing practices in its big-city school systems. The Council’s board requested the inventory in 2013 to better inform the public debate and to shape needed reforms.

"The Council's comprehensive review should help all urban school systems examine their testing practices in a way that will lead to considerable improvement," said Felton Williams, the chair-elect of the Council and the school board president in Long Beach, Calif.

"Everyone has some culpability in how much testing there is and how redundant and uncoordinated it is – Congress, the U.S. Department of Education, states, local school systems and even individual schools and teachers," added Michael Casserly, the Council’s executive director. "Everyone must play a role in improving this situation."

The study found that:

- The average amount of time devoted to taking mandated tests during the 2014-15 school year (i.e., tests that were required for every child in a designated grade) was 4.21 days or 2.34 percent of school time for the average 8th grader—the grade with the most mandated testing time.
- The average amount of mandated test time, however, differed by grade and did not include time spent on sample tests, optional tests, and program tests or time to prepare for the tests.
- The time spent on mandatory tests also does not include individual classroom testing or tests designed or acquired at the individual school level.

- Many of the required exams are administered during a two- to three-month period in the second semester and overlap with one another, meaning that testing time feels much longer than the actual percentage, which is spread across the entire school year.
- Students also can spend considerable time taking optional tests, tests associated with a program they are enrolled in, and tests administered to samples of students.
- Students sometimes take end-of-course exams alongside summative tests in the same subjects, contributing to the redundancy in testing of the same students.
- Four out of 10 districts reported having to wait between two and four months before receiving their state test results, meaning the results had limited utility to inform instructional practices.
- The amount of money that school districts spend on testing is considerable but constitutes less than one percent of their overall budgets.
- There is no correlation between mandated testing time and reading and math scores on the National Assessment of Educational Progress (NAEP). In other words, there's no evidence that adding test time improves academic performance.

“There are many reasons educators have found themselves saddled with the unwieldy, incoherent, at times illogical testing system that we have today and it will take considerable effort to recreate something more intelligent,” stated Casserly.

The report notes that over the last several years many of the Council districts examined have taken steps on their own to reduce the number of tests they administer. For example, some districts are reducing the number of assessments in the early grades, eliminating non-core testing or cutting back on district-mandated testing. Duval County, Fla., in Jacksonville, for example, reduced the number of K-12 student assessments from 52 in 2014-15 to 22 in 2015-16. Districts also are using parent feedback to guide changes in assessment policy and how they report student progress.

"As America's urban schools continue to focus on increased academic outcomes for our students, it is important that we have actionable data that can be used to guide instruction and help us focus on reducing learning gaps," said Superintendent Richard Carranza of the San Francisco school district, who chairs the Council board. "This self-initiated study of testing in our member school districts is an important tool that will guide how we move forward to improve our local testing environments.

"I applaud my colleagues and the Council of the Great City Schools for being at the forefront of this important topic for America's public schools," he added.

The Council released preliminary recommendations with the report that call for retaining current annual tests in core subjects but eliminating tests that are either redundant or low quality.

In addition, the Council announced that it will launch a commission of researchers, school leaders, teachers and parents to develop “a more thoughtful approach to assessing the academic needs of our urban schoolchildren.” Casserly indicated that commission chairs would be named in the next two weeks.

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Council of the Great City Schools

1301 Pennsylvania Avenue, N.W. ♦ Suite 702 ♦ Washington, D.C. ♦ 20004

EMBARGOED FOR RELEASE

October 8, 2015 (9 p.m., Pacific)

CONTACT: Henry Duvall

(202) 393-2427 or hduvall@cgcs.org

Pittsburgh School Board Member Named Urban Educator of the Year

LONG BEACH, Calif., Oct. 8 – William “Bill” Isler, who has served on the Pittsburgh Board of Public Education for the past 16 years, tonight won 2015 Urban Educator of the Year honors at the Council of the Great City Schools’ 59th Annual Fall Conference here.

Four big-city school board members competed for the nation’s highest honor for urban education leadership, recognizing in alternating years an outstanding superintendent and school board member from 68 of the largest urban school systems in the country.

Urban school leaders recognized Isler during the Council’s 26th Annual “Urban Educator of the Year” award banquet, where he received the prestigious Green-Garner Award in memory of two urban school leaders.

Sponsored by the Washington, D.C.-based Council, Aramark K-12 Education and Voyager Sopris Learning companies, the top prize is named for Richard R. Green, the first African American chancellor of the New York City school system, and businessman Edward Garner, who served on the Denver school board,

Elected to the Pittsburgh school board in 1999, Isler became president of the policy-making body in 2003, and through his leadership was able to regain lost support of the foundation community in funding Pittsburgh Public Schools. He has led the board through very challenging periods in the history of the district, including closing more than 30 underutilized schools.

He is recognized in the community as a board member who puts student achievement first, and equally for making sure the district is fiscally accountable for the use of taxpayer dollars. His leadership – five years as board president and at least 10 years as vice president – has contributed to efforts in increasing student academic success, which has resulted in higher graduation rates and more students attending postsecondary institutions.

“Bill Isler is one of the best school board members any urban school district could have,” says Council Executive Director Michael Casserly. “But he has also inspired improvement in urban education nationally as Pittsburgh Public Schools representative on the Council’s board of directors for 15 years – 12 of those on the executive committee and one year as chair of our national board.”

As the recipient of this year’s Green-Garner Award, Isler receives a \$10,000 college scholarship to present to a student.

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STATEMENTS

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FOR RELEASE
January 30, 2016

CONTACT: Henry Duvall
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Statement on White House Announcement of New Initiative On Computer Science

WASHINGTON, Jan. 30 –The Council of the Great City Schools is pleased to support a new White House initiative to build computer science skills for our nation’s students. Our public school students, particularly in the Great Cities, often have limited access to computers or technology outside of the school environment.

The Great City Schools have the unique challenge of ensuring our students are provided the same opportunities as their peers to develop the necessary skills for their future success. Increasing the focus on developing computer science and computer-based skills for all students will help to ensure their preparedness for success in post-secondary education and the workplace.

The Council is encouraged by President Obama’s efforts to support teacher training, curriculum development, and increased course offerings in computer science. Our students will benefit greatly from the additional resources identified in the President’s three-part plan to deliver high-quality computer science content. Student mastery of computer science skills and comfort with technology are important core skills in today’s society.

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FOR RELEASE
January 5, 2016
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**Statement by Michael Casserly, Executive Director
Council of the Great City Schools**

On New Executive Actions to Reduce Gun Violence and Make Our Communities Safer

WASHINGTON -- The Council of the Great City Schools strongly supports President Obama's new executive actions to reduce gun violence and make our communities safer.

Gun violence has touched nearly every major urban community in the United States over the last decade as well as many non-urban communities, and has taken the lives of too many promising young people for the nation to continue to tolerate inaction. Hardly a week passes without another example of a mass shooting or street violence involving firearms that should not be so easily available. Doing nothing is no longer an option, and the president should be applauded for his courage and determination to end the violence.

Our public schools, particularly in the nation's Great Cities, remain one of the safest places for our children to be, but the toll that street violence takes on our students is alarming and heart wrenching. Too many students have been gunned down or have seen family members, friends, or classmates killed; too many students miss school because of their apprehension about what will happen walking to and from school; and too many students are unable to concentrate on their academic work out of fear for themselves or grief for others. The price that our young people, particularly our males of color, are paying in our cities for the inaction of adults in reducing gun violence is unbearable. And the nation itself is paying a high cost as it squanders the lives of so much needed talent.

Today, the president announced a four-point action plan to reduce gun violence: licensure for gun sellers and expanded background checks on gun buyers; safer communities and stepped up law enforcement; enhanced mental health treatment and reporting; and research on gun safety technology.

This is an important step forward, but ending an epidemic of violence will take more than one voice, and more than one plan. For our part, the Great City Schools are working double-time to ensure that our students are safe, that discipline is just, and that achievement is high.

Congress, for its part, should be acting in tandem with the White House to ensure much broader gun reforms. At this critical time we need more than the president and his leadership. We need all of our leaders to find the political courage to come together to safeguard the future of our children, our communities, and our country.

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FOR RELEASE
December 10, 2015

CONTACT: Henry Duvall
(202) 393-2427

**Statement on Supreme Court Justice Scalia's Inaccurate and Offensive Remarks
By
Michael Casserly, Executive Director
Council of the Great City Schools**

WASHINGTON -- The Council of the Great City Schools, the nation's primary coalition of large urban public school systems, strongly resents U.S. Supreme Court Justice Antonin Scalia's inaccurate and offensive remarks that he delivered in the courtroom on December 9 in arguments in the *Fisher v. University of Texas* affirmative action case.

His remarks suggesting that minority students could do better academically in a "slower-track school" as opposed to advanced schools are not based on fact, and were unprofessional, inaccurate and, frankly, hurtful to those working in education who have seen minority students excel when given the opportunity and challenge to succeed.

We are not clear how minority students could be better off at "a less advanced school, a slower-track school where they do well." First, the facts are clear that many of the greatest scientific minds of any race in the country are products of Historically Black Colleges and Universities (HBCUs) – the so-called "slower track schools." The scholars and educators in HBCUs are second to none academically.

In addition, his comment that, "Most black scientists in this country don't come from schools like the University of Texas. They come from lesser schools where they do not feel that they're pushed ahead in classes that are too fast for them" is due only to the fact that African American students historically could not attend predominantly white institutions. Today, predominantly white institutions produce more African American scientists than do HBCUs.

In truth, of the 26,134 science, technology, engineering, and mathematics (STEM) degrees awarded to Black or African American students in 2009, only 4,734 such degrees were awarded at HBCUs. Almost 81 percent of STEM degrees that year were awarded at so called "faster-track" schools. For these Black scientists, classes at predominantly White institutions were obviously not too fast for them.

Justice Scalia's remarks were unbecoming of a member of the nation's highest court, and send the unfortunate signal to our over 7 million urban students that the highest academic standards are not expected of them.

##

TESTING ARTICLES

November 2, 2015

Media Report for the Council of the Great City Schools

Student Testing in America's Great City Schools: An Inventory and Preliminary Analysis Release

On October 24, 2015, The Council of the Great City Schools released *Student Testing in America's Great City Schools: An Inventory and Preliminary Analysis*. The report received extensive national and local coverage. The more than 1,400 stories about the report ranged from breaking news pieces to follow-up analysis and opinion. The coverage clearly benefitted from moving back the embargo to coincide with the White House release. The report coverage provided important context to the White House report, even leading in some pieces or receiving stand-alone coverage. Top outlets, such as The New York Times, The Washington Post, Associated Press, Education Week, and The Los Angeles Times covered the release and highlighted the research.

The New York Times

Obama Administration Calls for Limits on Testing in Schools

Kate Zernike

October 24, 2015

Faced with mounting and bipartisan opposition to increased and often high-stakes testing in the nation's public schools, the Obama administration declared Saturday that the push had gone too far, acknowledged its own role in the proliferation of tests, and urged schools to step back and make exams less onerous and more purposeful.

Specifically, the administration called for a cap on assessment so that no child would spend more than 2 percent of classroom instruction time taking tests. It called on Congress to "reduce over-testing" as it reauthorizes the federal legislation governing the nation's public elementary and secondary schools.

"I still have no question that we need to check at least once a year to make sure our kids are on track or identify areas where they need support," said Arne Duncan, the secretary of education, who has announced that [he will leave office in December](#). "But I can't tell you how many conversations I'm in with educators who are understandably stressed and concerned about an overemphasis on testing in some places and how much time testing and test prep are taking from instruction."

"It's important that we're all honest with ourselves," he continued. "At the federal, state and local level, we have all supported policies that have contributed to the problem in implementation. We can and will work with states, districts and educators to help solve it."

Teachers' unions, which had led the opposition on the left to the amount of testing, declared the reversal of sorts a victory. "Parents, students, educators, your voice matters and was heard," said Randi Weingarten, the president of the American Federation of Teachers.

And even some proponents of newer, tougher tests said they appreciated the administration's acknowledgment that it had helped create the problem, saying it did particular damage by encouraging states to evaluate teachers in part on test scores.

But the administration's so-called "testing action plan" — which guides school districts but does not have the force of law — also risks creating new uncertainty on the role of tests in America's schools. Many teachers have felt whiplash as they rushed to rewrite curriculum based on new standards and new assessments, only to have politicians in many states pull back because of political pressure.

Some who agreed that testing has run rampant also urged the administration not to throw out the No. 2 pencils with the bath water, saying tests can be a powerful tool for schools to identify weaknesses and direct resources. They worried that the cap on time spent testing — which the administration said it would ask Congress to enshrine in legislation — would only tangle schools in more federal regulations and questions of what, exactly, counts as a test.

"What happens if somebody puts a cap on testing, and to meet the cap ends up eliminating tests that could actually be helpful, or leaves the redundancy in the test and gets rid of a test that teachers can use

to inform their instruction?” asked Michael Casserly, the executive director of the [Council of the Great City Schools](#), an organization that represents about 70 large urban school districts.

Michael J. Petrilli, the president of the Thomas B. Fordham Institute and one of the most vocal proponents for higher standards and tougher tests, said, “There’s plenty of agreement that there’s too much testing going on.” But, he added, “we have to be careful, as with anything federal, that it doesn’t lead to unintended consequences.”

The administration’s move seemed a reckoning on a two-decade push that began during the Bush administration and intensified under [President Obama](#). Programs with aspirational names — [No Child Left Behind](#), Race to the Top — were responding to swelling agreement among Democrats and Republicans that higher expectations and accountability could lift the performance of American students, who chronically lag their peers in other countries on international measures, and could help close a chronic achievement gap between black and white students.

States, led by the National Governors Association and advised by local educators, created the so-called Common Core standards, which outlined the skills students should have upon graduation, and signed on to tests tied to those standards.

But as the Obama administration pushed testing as an incentive for states to win more federal money in the Race for the Top program, it was bedeviled by an unlikely left-right alliance. Conservatives argued that the standards and tests were federal overreach — some called them a federal takeover — and called on parents and local school committees to resist what they called a “one size fits all” approach to teaching.

On the left, parents and unions objected to tying tests to teacher evaluations and said tests hamstrung educators’ creativity. They accused the companies writing the assessments of commercializing the fiercely local tradition of American schooling.

As a new generation of tests tied to the Common Core was rolled out last spring, several states abandoned plans to use the tests, while others renounced the Common Core, or rebranded it as a new set of local standards. And some parents, mostly in suburban areas, had their children opt out of the tests.

Mr. Duncan’s announcement — which was backed by his designated successor, John B. King Jr. — was prompted in part by the anticipation of a new survey from the [Council of the Great City Schools](#), which set out to determine exactly how much testing is happening among its members.

That survey, also released Saturday, found that students in the nation’s big-city schools will take, on average, about 112 mandatory standardized tests between prekindergarten and high school graduation — eight tests a year. In eighth grade, when tests fall most heavily, they consume an average of 20 to 25 hours, or 2.3 percent of school time. The totals did not include tests like [Advanced Placement exams](#) or the ACT.

There was no evidence, the study found, that more time spent on tests improved academic performance, at least as measured by the [National Assessment of Educational Progress](#), a longstanding test sometimes referred to as the nation’s report card.

“Because so many actors are adopting and requiring tests, you often find a whole portfolio of tests not being very strategic,” said Mr. Casserly, the council’s executive director. “It’s often disjointed and disconnected and incoherent in many ways, and it results in a fair amount of redundancy and overlap.”

Still, he said: “We don’t think tests are the enemy. We think there’s an appropriate place for them.”

The administration said it would issue “clear guidance” on testing by January. Some of the language of the announcement Saturday was general; it said, for example, that tests should be “worth taking” and “fair.” Like new guidance from many states, it stressed that academic standards and curriculum are to be fleshed out locally.

But it also said that tests should be “just one of multiple measures” of student achievement, and that “no single assessment should ever be the sole factor in making an educational decision about a student, an educator or a school.”

Still, it emphasized that the administration was not backing away entirely from tests: The announcement said tests should cover “the full range of relevant state standards,” and elicit “complex student demonstrations or applications of knowledge and skills.”



Study: Kids take 100-plus required tests through 12th grade

Jennifer C. Kerr and Josh Lederman, The Associated Press
October 26, 2015

WASHINGTON (AP)— Students, parents and teachers have long lamented the hours that kids spend taking standardized tests, especially since the introduction of the Common Core academic standards. But just how much time each year is it?

- A. Between 10-15 hours.
- B. Between 20-25 hours.
- C. Between 30-35 hours.

The correct answer is “B,” according to a comprehensive study of 66 of the nation’s big-city school districts by the **Council of the Great City Schools**. It said testing amounts to about 2.3 percent of classroom time for the average eighth-grader in public school. Between pre-K and 12th grade, students took about 112 mandatory standardized exams.

The study analyzed the time spent actually taking the tests, but it did not include the hours devoted to preparation ahead of the testing required by the federal government, states or local districts. It also did not include regular day-to-day classroom quizzes and tests in reading, math, science, foreign languages and more.

In connection with the study’s release Saturday, President Barack Obama called for capping standardized testing at 2 percent of classroom time. Even while acknowledging that the government shares some responsibility for an over-emphasis on testing, the president said federal officials would work with states, schools and teachers to “make sure that we’re not obsessing about testing.”

The Obama administration still supports annual standardized tests as a necessary assessment tool, and both House and Senate versions of an update to the No Child Left Behind law would continue annual testing. But the rewrite legislation would let states decide how to use test results to determine what to do with struggling schools. Differences between the two bills still need to be worked out.

“Learning is about so much more than just filling in the right bubble,” Obama said in a video released on Facebook. “So we’re going to work with states, school districts, teachers, and parents to make sure that we’re not obsessing about testing.”

To drive the point home, Obama and Education Secretary Arne Duncan scheduled an Oval Office meeting Monday with teachers and school officials working to reduce testing time.

“How much constitutes too much time is really difficult to answer,” said Michael Casserly, the council’s executive director. He said the study found plenty of redundancy in required testing — supporting concerns from teachers and other critics about the tests consuming too much teaching and learning time.

For example, Casserly said that researchers found some states and school districts were mandating not only end-of-year tests, but end-of-course tests in the same subjects, in the same grade.

“Having states and school districts jointly reviewing redundancy and overlap in their testing requirements will be an important step in reducing unnecessary assessments,” he said.

The council reviewed testing for more than 7 million students in about three dozen states during the 2014-2015 school year.

A “testing action plan” released by the Education Department over the weekend said too many schools have unnecessary testing.

The department pledged to work with states and schools on ways to reduce time spent on testing, with federal guidance to the states expected in January. The plan also said the agency has adjusted its policies to provide more flexibility to states on how much significance to place on student test results in evaluating teachers.

Aiming to close achievement gaps and assess learning, the No Child Left Behind Act signed by President George W. Bush in 2002 mandated annual testing in reading and math for students in grades three through eight and again in high school. States and local school districts decide which standardized assessments to use to gauge student learning and progress in those two subjects and others.

This past spring saw the rollout of new tests based on the Common Core college-ready academic standards in reading and math. About 12 million students in 29 states and the District of Columbia took the tests developed by two groups — the Smarter Balanced Assessment Consortium and the Partnership for Assessment of Readiness for College and Careers (PARCC).

Other findings in the council’s report:

- The most tests were required in 8th and 10th grade; the fewest were in pre-K, kindergarten and first grade.

- Four in 10 districts report having to wait between two months and four months before getting state test results. The lack of timely results means teachers begin a new school year not knowing where a student needs to improve.

Associated Press

Education Department Helps States Cut Standardized Testing

BY ASSOCIATED PRESS

The Obama administration is offering states and local school districts a lesson plan of sorts to cut the amount of time that students spend on those fill-in-the-bubble and other standardized tests.

The Education Department released guidance Tuesday to states and local school districts outlining different ways they can use existing federal money to reduce testing in the nation's public schools. It follows a call by President Barack Obama last October to cap standardized testing and complaints by teachers, parents and others that too many hours are spent "teaching to the test."

In a letter to state school officials, the department details how certain federal money can be used to cut tests. States and districts, for example, could use federal education dollars intended for the development of state assessments to instead conduct audits of their tests to see if they have redundant assessments or low-quality ones that could be eliminated.

States also use federal dollars to develop strategies to improve the quality of current tests or decrease the time students spend taking them, the letter said.

"High-quality assessments give parents, educators and students useful information about whether students are developing the critical thinking and problem solving skills they need," Acting Education Secretary John King Jr. said. "But there has to be a balance, and despite good intentions, there are too many places around the country where the balance still isn't quite right."

The goal isn't to do away with standardized tests. Obama, in October, said smart, strategic tests are needed to measure students' learning and performance in school. But, he said, "we're going to work with states, school districts, teachers and parents to make sure that we're not obsessing about testing."

The new guidance from the department was released via social media, on YouTube.

Students spend about 20 to 25 hours a school year taking standardized tests, according to a study last year of the nation's 66 largest school districts by the **Council of the Great City Schools**.

In all, between pre-K and 12th grade, students take about 112 standardized exams. The council said the testing amounts to 2.3 percent of classroom time for the average 8th grader. Obama has encouraged states to cap testing at 2 percent of classroom time.

The 2002 No Child Left Behind education law ushered in a new era of testing in public schools. It required annual testing in reading and math in grades three to eight, and once in high school.

Those tests would still be required under a new education law signed by Obama late last year, but states now have more flexibility on how best to assess teachers, schools and students — with measures that consider other factors beyond the test scores.

The Education Department highlighted two areas where standardized testing has been eased in schools.

In Tulsa, Oklahoma, the district has dramatically cut the overall time spent on district-mandated testing by reducing the frequency of some tests, eliminating one test entirely, and removing district requirements to implement others. Third-graders, for example, had been spending about 1,240 minutes on district-required tests and now will spend 660 minutes on such tests, the department said. Tennessee also is in the process of streamlining some of its state-mandated tests.

ASSOCIATED PRESS

How can schools stop giving students bad tests?

By Ben Thompson, February 3, 2016

The US Department of Education on Tuesday called for states to find and weed out “low-quality, redundant or unhelpful testing” in their schools, and offered guidance to support the process.

Acting US Secretary of Education John B. King, Jr., in a [release sent to states’ top school officials](#), acknowledged that many students are spending too much class time taking tests, and that exams can be overemphasized or less effective than other school activities.

“High-quality assessments give parents, educators and students useful information about whether students are developing the critical thinking and problem solving skills they need to succeed in life,” [Dr. King said in a department video](#) posted online Tuesday. “But there has to be a balance, and despite good intentions, there are too many places around the country where the balance still isn’t quite right.

“We hope this guidance will help restore that balance and give back some of the critical learning time that students need to be successful,” he said.

The education department’s announcement comes after [President Obama requested](#) it “work aggressively” to make sure tests comply with seven guiding principles outlined in a [Testing Action Plan released in October](#), as well as aim to cut down on over-testing.

That action plan calls for tests that meet several criteria: that they are worth taking, high quality, time-limited, fair, transparent, tied to improved learning, and that they are not the only measure used in evaluating students.

“We’re going to work with states, school districts, teachers, and parents to make sure the principles I outlined are reflected in classrooms across our country,” Mr. Obama wrote last fall. “Together, we’re going to help prepare our kids for a lifetime of success.”

[An October study](#) that was referenced by Obama and published by the [Council of the Great City Schools](#), a body of more than 60 urban school districts around the country, found “considerable redundancy” in required tests, as well as a general trend of testing that is “not anchored to any clear understanding of what the nation, states, or school districts wanted students to know or be able to do in order to be ‘college- and career-ready.’ ”

The council also found that on average, students take more than 100 standardized tests throughout their primary and secondary education, totaling 20 to 25 hours of class time per year – more than the 2 percent of class time suggested by Obama.

The report concluded that a variety of causes contributed to educators being “saddled with the unwieldy, at times illogical, testing system that we have today,” adding that school systems should employ “considerable effort to recreate something more intelligent.”

King also made it known Tuesday that the Department of Education would assist schools in changing their testing procedures with availability for consulting and through the use of funds made available in the [Every Student Succeeds Act](#) (ESSA). The ESSA is a successor to the No Child Left Behind Act of 2001, which first required the standardized testing of students in order for schools to receive federal funding, that was [signed into law by Obama in December](#).

“The [Obama] Administration is committed to supporting States, districts, and schools in administering high-quality and fair assessments that take up the minimum necessary time, and reflect the expectation that all students will graduate college- and career-ready,” King wrote Tuesday.

“The good news is that many states and districts... are working to decrease testing burden on students and teachers while ensuring that assessments move beyond bubble tests to measure vital skills like writing, problem solving, and critical thinking,” he said in the video release. “We need this to happen in all states in communities.”

PBS NEWSHOUR

Six years on, Arne Duncan says we're testing kids too much

October 26, 2015 – National TV broadcast at 6:45 p.m., EST

Standardized testing in schools has gotten out of hand, according to the Obama administration. After being supportive of testing and assessment, the White House has reversed policy and now recommends capping testing at 2 percent of class time. Gwen Ifill sits down with Education Secretary Arne Duncan and Michael Casserly of the Council of the Great City Schools.

TRANSCRIPT

GWEN IFILL: When it comes to standardized testing in schools, how much is too much?

In a policy reversal, the Obama administration, which has supported student and teacher assessment, now says testing has gotten out of hand. This weekend, the White House recommended capping testing at 2 percent of class time.

A new report conducted by the **Council of Great City Schools** found the average student sits for as many as 112 mandatory standardized tests between kindergarten and high school graduation.

Earlier today, I sat down with the outgoing education secretary, Arne Duncan, and Michael Casserly, the executive director of the Council of Great City Schools, about the problem and the proposed solutions.

Mr. Casserly, Secretary Duncan, thank you very much for joining us.

Secretary Duncan, you first started talking about the inadequacies of testing and the shortfalls, the flaws two, three years ago. What took so long for the Education Department to embrace this idea today?

ARNE DUNCAN, Education Secretary: Well, I think we have embraced this idea for a while.

What's different now is we actually have data. And I have been talking about this, as you know, for a while, and the president has. But what we had were lots of anecdotes.

And we knew we needed to get to a better spot, but no one had ever surveyed the nation.

So, I went to Mike about two years ago and said, would you be willing to ask your districts what to do in this space? And he was ahead of me. He said, guess what? We're already doing it.

And it's taken them two years. It's that complicated to get together. But now we're beyond anecdotes. We have facts, and where there is too much time spent on testing, a redundancy or duplicative stuff, that doesn't make any sense. And we both want high standards. We both want good assessments that drive instruction.

But where we're wasting students time, where we're adding stress, we need to challenge that status quo. And that's exactly what we're trying to do.

GWEN IFILL: Mr. Casserly, some people have already said that the solution is not the solution. The federal government saying you should put this cap on testing is not the solution to the over testing that started in the first place.

MICHAEL CASSERLY, Council of Great City Schools: Well, I actually agree with that.

I think this is a very complicated issue. It involves the time that's devoted to testing. It involves the quality of the test. It involves the redundancy of the test. It involves the use of the test. It involves all kinds of pretty complicated factors.

You might solve a little bit of the time problem by putting a time cap on this, but you could also do damage at the same time if you don't address some of those other questions. So if you lowered the cap to, say, 1 percent, you could still have redundancy in the test, and you could still have bad tests. There may be less of them. But you haven't solved the larger problem.

GWEN IFILL: So, how do you guard against unintended consequences, as happened from the testing?

MICHAEL CASSERLY: Well, I think one of the things that all of us have to do now is to have a more thoughtful conversation about what smart assessments would actually be and see if we can figure out some way to coordinate this a lot better across federal, state and local entities.

One of the things that was really clear to us from the research that we did on this was that these entities don't necessarily talk to each other. These layers of the education apparatus don't necessarily talk to each other. So we have plenty of examples where people were administering overlapping tests, and kids were actually toggling back and forth from one test to another, when it could have been solved by just having differing layers of government talk to each other a little bit better.

GWEN IFILL: Secretary Duncan, government talking to each other is not necessarily what government does best. In fact, there are people who say that part of the over testing was a result of people trying to meet standards that you were promoting, Race to the Top, Common Core standards, and, as a result, you kept layering one test on top of the other.

Do you feel that you might have some responsibility for that?

ARNE DUNCAN: Oh, no, I think we all do.

And I think, Gwen, what has been so — what I have appreciated so much is, this is — honestly, this is real leadership in action. This is our major urban school districts coming together and saying we need to do better. This is the state chief officers coming together with us saying we need to do better. And it's us being self-reflective and looking in the mirror and say we want to do better together.

And, as you know better than I, so often, in Washington, people just yell and point fingers and they just get louder about I'm right and everyone else is wrong. I think what we're all trying to do is say, how do we better partner, how do we better advice, how do we get to a better spot for children?

Again, the goal here is not to test. The goal is to improve instruction, to improve what is going on every single day for that child in classroom. And where we're getting good information to teachers and to parents and to students themselves that empower them to build upon strengths and work on weaknesses, that's a good thing.

Where we are doing things that are redundant, or duplicative, or not helpful, well, that's a waste of everyone's time and energy.

GWEN IFILL: Well, it's not just Washington. A lot of the movement to opt out of these tests started in local school districts and around the country with parents, with teachers.

How much of that will be satisfied by Washington saying do less?

ARNE DUNCAN: Well, I think there are two sides of this coin, folks who think we just need to do more and more testing. I think that is wrong. Folks who think we shouldn't do any assessments, that's equally wrong.

And there is a commonsense middle ground here. This is very much a civil rights issue. Historically in this nation, we swept under the rug the horrific disparities in outcomes, the horrific achievement gap between black and white students and Latino and white students and poor students and wealthier students. Too much testing is bad. Walking away from assessment is equally bad.

But let's find the commonsense middle ground. I think that's what we're all striving to do and to do together.

GWEN IFILL: It doesn't sound like you have figured out where that sweet spot is, Mr. Casserly.

MICHAEL CASSERLY: No, we really haven't.

And part of our goal here was just to gather some data on how much testing was actually done. We haven't figured out the right balance yet. We did announce today that the Council of Great City Schools, in coordination with Council of Chief State School Officers, would form a commission to start looking at exactly what the right balance would be, what would models and options for school districts be that would present a much more rational and intelligent assessment system.

GWEN IFILL: In the meantime, there has been a huge, I would say, explosion of a business model which is based on testing. Don't you anticipate pushback from those companies who have been behind a lot of these tests?

MICHAEL CASSERLY: oh, I think the answer to that is, yes, of course we do. We're not naive about this and we certainly don't think that just because we put out some data about how much testing it is that all of a sudden the test publishers are going to go, oh, gee, heavens, I never knew, we should stop selling these tests.

I don't believe that for a second. But I do think that, in cooperation with the federal government, the Department of Education, the states and the big urban public school systems, that we can at least start creating a more intelligent conversation about what it is we buy.

ARNE DUNCAN: Gwen, if I could add, I think it's just so important part of the conversation is on the amount, and that's an important conversation to have, but that's maybe half of the battle here.

The big thing that we have to get to is, are these assessments high-quality? And so, for example, if folks just cut back testing and they go to fill-in-the-bubble tests, that would be a disaster. We want writing to be assessed. That takes a little time. We want critical thinking to be assessed, and so making sure that there are high-quality assessments that are available in real time, the results, to teachers, to parents, to students, so that, again, instruction improves on a daily, on a weekly basis.

GWEN IFILL: How do you measure effectiveness? That's the other piece of this. It's one thing to have quality. It's another thing to have quantity.

But then you have to be able to measure that learning has actually improved. And that's been the defense which testers have used, which is we need to have that basic line.

ARNE DUNCAN: I think the world is changing and it's really important.

Historically, Gwen, as you know, you had 50 different states doing 50 different tests, which you couldn't compare and frankly cost a heck of a lot more money because everyone was doing their own thing. And what you now have, again, thanks to Mike's leadership and the state chief officers and others' leadership, governors' leadership, is you have more and more states starting to work together.

And so the real key in all this, Gwen, is how do we accelerate the pace of change? Who is doing a fantastic job with English-language learners? Who is doing a great job in rural communities, or in inner-city communities, or in Native American reservations and how do we replicate and share what is working and scale those best practices?

GWEN IFILL: And you think it can be effective?

ARNE DUNCAN: I know it can be effective.

And I visit schools all — probably more schools than almost anybody across 50 states and I see extraordinary work. We met with two teachers earlier today who talked about how the data they're getting is helping them not to teach to 25 or 30 students in aggregate, but to teach individually, personalized way — in a personalized way to every single child and help them get to where they need to go.

So, a lot of learning to do going forward, but great assessments actually improve instruction, drive right teaching and learning, are not in conflict with it. We just have to make that more the norm and not the exception.

GWEN IFILL: Secretary Arne Duncan, Michael Casserly, thank you both very much.

MICHAEL CASSERLY: Thank you.

ARNE DUNCAN: Thank you.

The Washington Post

Study says standardized testing is overwhelming nation's public schools

Lyndsey Layton
October 24, 2015

The number of standardized tests U.S. public school students take has exploded in the past decade, with most schools requiring too many tests of dubious value, according to the first comprehensive survey of the nation's largest districts.

A typical student takes 112 mandated standardized tests between pre-kindergarten classes and 12th grade, a new [Council of the Great City Schools](#) study found. By contrast, most countries that outperform the United States on international exams test students three times during their school careers.

In a [video posted to Facebook](#) by the White House on Saturday, President Obama pledged to take steps to reduce testing overload.

In "moderation, smart, strategic tests can help us measure our kids' progress in school, and it can help them learn," Obama said. "But I also hear from parents who, rightly, worry about too much testing, and from teachers who feel so much pressure to teach to a test that it takes the joy out of teaching and learning, both for them and for the students. I want to fix that."

The heaviest testing load falls on the nation's eighth-graders, who spend an average of 25.3 hours during the school year taking standardized tests, uniform exams required of all students in a particular grade or course of study. Testing affects even the youngest students, with the average pre-K class giving 4.1 standardized tests, the report found.

The study analyzed tests given in 66 urban districts in the 2014-2015 school year. It did not count quizzes or tests created by classroom teachers, and it did not address the amount of time schools devote to test preparation.

It portrays a chock-a-block jumble, where tests have been layered upon tests under mandates from Congress, the U.S. Department of Education and state and local governments, many of which the study argues have questionable value to teachers and students. Testing companies that aggressively market new exams also share the blame, the study said.

"Everyone is culpable here," said Michael Casserly, executive director of the Council of the Great City Schools. "You've got multiple actors requiring, urging and encouraging a variety of tests for very different reasons that don't necessarily add up to a clear picture of how our kids are doing. The result is an assessment system that's not very intelligent and not coherent."

Ahead of the study's release, the U.S. Department of Education offered a mea culpa of sorts, issuing a 10-page "action plan" to states and local districts that spells out ways to reduce redundant and low-quality testing. The department pledged to make money and staff available to help and promised to amend some of its policies.

“At the federal, state and local level, we have all supported policies that have contributed to the problem in implementation,” Education Secretary Arne Duncan said in a statement. “We can and will work with states, districts and educators to help solve it.”

The agency is recommending that states cap the amount of time devoted to test-taking to no more than 2 percent of class time. A similar proposal is part of the bill pending in the Senate to replace No Child Left Behind. Casserly cautioned against an arbitrary limit, saying he is concerned that states would indiscriminately lop off tests to meet a federal testing cap. A better approach, he said, would be a coordinated effort among all players — federal, state and local — to come up with a more thoughtful system.

The council’s report adds fuel to the national debate about testing that has spurred various “opt out” movements among parents and students and has put growing political pressure on Congress and state legislatures to cut back.

In one of the most notable attempts to reduce testing, Miami-Dade County Public Schools Superintendent Alberto Carvalho earlier this year cut the number of district-created end-of-course exams from 300 to 10 and eliminated them entirely for elementary schools.

“I believe in accountability,” said Carvalho, who runs the nation’s fourth-largest school district. “But fewer assessments of higher quality are better. . . .What we have now across the country is confusing, hard to navigate and, I believe, abusive of both teacher and student time.”

California eliminated its high school graduation test three weeks ago, joining Minnesota, Mississippi, Alaska, Rhode Island and South Carolina. Virginia has reduced its number of state-level tests, and Montgomery County, Md., last month put an end to its high school final exams.

Standardized testing has caused intense debate on Capitol Hill as lawmakers work to craft a replacement for No Child Left Behind. Testing critics tried unsuccessfully to erase the federal requirement that schools test in math and reading. Civil rights advocates pushed back, arguing that tests are an important safeguard for struggling students because publicly reported test scores illuminate the achievement gap between historically underserved students and their more affluent peers.

But even testing supporters agree about an overload.

“For those of us who support annual assessments, it doesn’t mean we support this craziness,” said Kati Haycock, president of the Education Trust, an advocacy group focused on reducing the achievement gap. “There’s a clear problem here.”

Testing tends to be concentrated between February and May. The council’s study found numerous examples of redundancy, with students often taking an end-of-course test, an Advanced Placement test and a final exam for the same course.

In 40 percent of districts surveyed, test results aren’t available until the following school year, making them useless for teachers who want to use results to help guide their work in the classroom, Casserly said.

Jeffrey Cipriani teaches second grade at Orchard Gardens K-8 Pilot School in Boston. Even though his students are not in a grade that is required by federal law to be tested, the Boston Public Schools has

him administer reading tests to his students three times a year. Because the tests are individual and can be as long as 90 minutes, it takes Cipriani about three weeks to test the whole class.

“It’s a colossal amount of time,” he said. “I probably spend about 60 hours not teaching reading but just sort of giving those assessments. They’re valuable but not that valuable.”

The study found no correlation between the amount of testing in a district and the way its students perform on the National Assessment of Educational Progress (NAEP), a federal test given every two years that is the only consistent measure of student achievement across state lines.

“We can’t assess our way to academic excellence,” Carvalho, of the Miami-Dade school system, said.

While public schools have been administering standardized tests for generations, the current buildup began after Congress passed No Child Left Behind in 2001 and required states to test all students in math and reading annually from third grade through eighth grade, and once in high school.

States that failed to make academic progress faced a series of consequences. States and districts responded by adding new tests during the school year to ensure students were on track.

“You prepare for the test to prepare for the test to prepare for the test,” said Robert Schaeffer of the National Center for Fair and Open Testing, a nonprofit organization critical of standardized testing.

And, the study found, Obama administration policies have escalated the issue.

To win a grant under the competitive Race to the Top program, or to receive a waiver from No Child Left Behind, states had to evaluate teachers based in part on student test scores. Since federal law required standardized tests only in math and reading in certain grades, states added tests in social studies, science, languages — even physical education — to have scores they could use to evaluate teachers.

“Many of the appalling things reported on here are the direct result of the way the federal government has approached this,” said Marc Tucker, president of the National Center on Education and the Economy. “The accountability system is what’s driving this and it’s fundamentally flawed.”

In its new guidance to states, the U.S. Department of Education tries to soften its emphasis on using test scores to evaluate teachers and urges states and local districts to cut down on redundant and low-quality tests.

The agency also pledged to work with states to amend waivers they have received under No Child Left Behind “to reduce testing in grades and subjects that are not subject to federal testing requirements and/or find alternative ways” to judge student achievement and use that to evaluate teachers.

“The time is now to take some new and meaningful steps to help schools deal with testing where it is unnecessary,” said John King, who is slated to succeed Duncan in January. “This is something the president and I have talked about, and it will be a key priority for me in our work with states and districts over the next 14 months.”

The Washington Post

Obama meets with educators to talk about standardized testing

By [Lyndsey Layton](#) and [Emma Brown](#) October 26, 2015 online; October 27, 2015 print edition

Bootsie Battle-Holt, a middle school math teacher from Los Angeles, found herself sitting on a couch in the Oval Office on Monday morning, telling President Obama about the barrage of tests that she is required to administer to her students.

“He said that he knows for sure at this point that many of our students are being overtested, and he’s dedicated to a plan to mitigate that,” said Battle-Holt, one of two teachers invited to meet with Obama, along with a cadre of federal, state and city education officials.

The private meeting came two days after Obama acknowledged that his policies have helped lead to overtesting in the nation’s public schools and pledged to reduce it.

“I walked away really feeling this is an issue that the president clearly cares about and intends to take action on,” said Farida Mama, a fifth-grade math teacher at UP Academy Dorchester, a public charter school in Boston’s public school system.

The White House invited the teachers to Washington because they are policy fellows with Teach Plus, a nonprofit organization that aims to amplify the voices of teachers in education policy. They were joined by U.S. Education Secretary Arne Duncan and his deputy, John King, who is slated to succeed Duncan in December.

A typical student takes 112 mandated standardized tests between pre-kindergarten classes and 12th grade, according to a study released Saturday by

the Council of the Great City Schools, which represents the nation's 66 largest school systems. That doesn't count quizzes created by individual teachers or diagnostic tests given to some students but not all.

The study blamed federal, state and local school districts for creating a jumble of tests, many of them redundant and of dubious value to teachers and students.

It triggered an immediate reaction from Obama, who said that he wants U.S. students to take fewer, better tests. He pledged as much in an open letter to teachers and parents the White House released Monday.

At the White House meeting, Obama mused that one solution could be to give a short assessment at the beginning of the school year to establish a baseline and a brief test at the end to measure student growth, Battle-Holt said.

Several people at the meeting said the president made it clear that some minimum amount of standardized testing is needed to hold schools accountable for educating all children, especially those from groups that have been historically underserved.

But Obama expressed an interest in ways to measure student learning that are more creative than multiple-choice tests, Mama said, adding that they discussed the projects and portfolios of student work that her arts-based school uses to evaluate student achievement.

The heaviest testing load falls on the nation's eighth-graders, who spend an average of 25.3 hours during the school year taking standardized tests, uniform exams required of all students in a particular grade or course of study. Testing affects even the youngest students, with the average pre-K class giving 4.1 standardized tests, the report found.

Most countries that outperform the United States on international exams test students three times during their school careers.

In response to the study, Duncan released a “testing action plan” that recommends a cap on the amount of time that students spend testing at 2 percent of overall instructional time. A similar proposal is part of an education bill pending in the Senate.

But Michael Casserly, the executive director of the **Council of the Great City Schools**, said an arbitrary cap could have the perverse effect of making the testing system more incoherent. “There is a very strong possibility that people will eliminate the tests that are actually useful,” he said.

Sen. Lamar Alexander (R-Tenn.), chairman of the Health, Education, Labor and Pensions Committee, cautioned the administration against recommending a cap on testing. “One more Washington decree — even if it is only a recommendation for now — is not the way to solve the problem of too many federal mandates,” Alexander said.

Some school systems have begun jettisoning tests. On Sunday, Boston Public Schools announced it would reduce some mandatory testing at lower-performing schools for grades 3 and up and would give higher-performing schools discretion over the number of tests to administer. Miami-Dade County Public Schools Superintendent Alberto Carvalho earlier this year cut the number of district-created end-of-course exams from 300 to 10 and eliminated them for elementary schools.

But Carvalho said Monday that a focus on the number of tests, or time spent taking them, is misguided.

“The next phase of the conversation cannot be about a cap,” he said. “It’s really a quantitative analysis. . . . Can they actually improve teaching and learning? Are they useful to teachers, and do they transparently inform communities and parents about performance?”

Education Dive

What should districts keep in mind when weighing new federal testing guidelines?

The Ed Department has issued new assessment guidance under Obama's Testing Action Plan

By [Erin McIntyre](#) | February 11, 2016

In a video released last week by the U.S. Department of Education, acting Secretary of Education Dr. John B. King Jr. discussed ways states can get rid of poor quality, redundant, and “unhelpful” testing. The YouTube clip, announced via press release, came alongside a [written letter](#) setting guidelines for states to implement President Barack Obama’s [Testing Action Plan](#).

The department also opened "office hours" for states and districts that felt the need for additional feedback or consultation on scaling back testing.

“High-quality assessments give parents, educators, and students useful information about whether students are developing the critical thinking and problem solving skills they need to succeed in life,” Dr. King noted. “But there has to be a balance, and despite good intentions, there are too many places around the country where the balance still isn’t quite right. We hope this guidance will help restore that balance and give back some of the critical learning time that students need to be successful.”

In the video, Dr. King stressed the importance of balance. Testing can’t be scrapped all together, but it also can’t overpower classrooms. Student progress and performance has to be tracked, but not to the point where it becomes a sole focus.

The letter showcased a list of bulleted points for districts to weigh while assessing whether or not their current testing regimen is helpful.

U.S. students spend between 20 and 25 hours annually on standardized tests, according to a 2015 study of learners in 66 large districts by the [Council of the Great City Schools](#). To JoLisa Hoover, a [Teaching Ambassador Fellow](#) and fourth grade teacher at River Ridge Elementary in Texas' Leander School District, the federal guidance was welcome.

“Students have had reactions to testing that ranged from mild jitters that are easily calmed, to students who throw up during testing, or students with depression or thoughts of suicide,” Hoover told Education Dive.

In a blog post, she wrote that one 10-year-old was so afraid of the consequences of performing poorly on a test that she couldn't "catch her breath to express her fear."

"As I dried her tears," Hoover wrote, "I knew that I did not want to stand by and be a part of a system that made any child feel that all that mattered was a number on what I knew was a low quality test."

Yet Hoover expects positive results from the new federal guidance. "I'm hopeful that this will mean that my students will have more time to learn, to innovate, and to imagine," she explained.

In the announcement, the Department of Education also flagged two novel approaches already under way in Tennessee and in Tulsa, OK, as models for potential success.

The [Tennessee Task Force on Student Testing and Assessment](#) was established last spring, nearly a year ahead of the guidelines. Procedures and data around execution of the state's [TNReady](#) exam was scrutinized and collected.

The information was then used to deepen assessment decisions for the state and its various districts. The Task Force specifically looked at yearly summative standardized assessments, formative (both interim and benchmark) assessments, and test preparation and logistics.

In September 2015, it released 16 recommendations designed to address concerns about too much testing. Unrelated to the Task Force, students taking the TNReady test online suffered a [series of "massive" glitches](#) that rendered their tests unusable.

Education experts like Matt Chapman, the CEO of Northwest Evaluation Association (NWEA), a nonprofit that provides research-based assessments and professional development to educators and policymakers, watched the release of the new federal guidance closely.

"Over the last year, NWEA has led a comprehensive effort to help educators better understand and use educational assessments to support student learning and growth," he said.

When the NWEA surveyed district administrators for its 2014 Make Assessment Matter report, Chapman said, it found that 85% of teachers were not adequately prepared to use assessments. His organization plans to release additional research on the topic in May.

Chapman also pointed to another resource for schools and school leaders: the website [AssessmentLiteracy.org](#), which aims to help teachers understand various uses for assessments and how they can use the data gained to bolster their instruction in the classroom.

"School leaders and districts should prioritize coherent assessment systems over a focus on individual assessments," Chapman noted, "They should also provide teachers and administrators with appropriate in-service training around the effective use of assessments."

He stressed that states should take advantage of the flexibility provided under the Every Student Succeeds Act, and that schools and districts should identify an individual mix of assessments and professional development that would work well for their own communities.

“This requires measuring growth as well as proficiency, as is now permitted under the new law,” Chapman explained. “Simultaneously, it’s important to decrease the burden of high-stakes accountability assessments, thereby allowing more time for teaching and learning. So, as long as a given system produces reliable, objective evidence of the performance of each cohort of students as required by law, the flexibility to design the system for local needs can enhance the likelihood that teaching will be better informed and more aligned to individual needs.”

And that, he said, means that learning would be enhanced.

The NWEA's own [Task Force on Assessment Education for Teachers](#) was assembled to take a hard look at the state of assessment education across the U.S. Among its members are teaching students, veteran educators, national education organizations, and experts who work in assessment education.

Federal money is also available for districts and states to wrestle with testing assessments. The [Enhanced Assessment Grants](#) program provides funding to states in support of the development of efficient and useful assessments.

President Barack Obama’s 2017 budget proposal is going to mirror that of 2016, the Education Department said, with around \$403 million to facilitate state assessments that will help states figure out their testing quandaries.

Yet some things haven’t changed. Under the Every Student Succeeds Act, states can be [fiscally sanctioned](#) with reduced or withheld federal funding if more than 5% of their K-12 student population opts out of standardized testing.

That could be concerning to districts as the [national opt-out movement](#) continues to show no sign of slowing down.

Taking Tests 2.34 Percent of School Time: Too Little or Too Much?

02/26/2016 10:47 am ET | **Updated** 23 hours ago

The new Every Student Succeeds Act (ESSA) is shifting state accountability systems away from test-driven academic performance toward a balance between academic and non-academic factors. While ESSA opens new conversations as to the type of assessments and their applications to inform teaching and learning, it is vital that the dialogue start by asking how much are our public school students being tested?

Data show that since the implementation of NCLB students are taking more tests, more often, and for a variety of reasons. Dr. Raymond Hart, Director of Research for the Council of the Great City Schools (CGCS), recently discussed his latest report that sought to capture the amount of time students spend in school taking tests.

According to Dr. Hart's report, [*Student Testing in America's Great City Schools: An Inventory and Preliminary Analysis*](#), students in the major urban school districts spent 4.22 days, or 2.34 percent of last year's school time, taking tests. In 2014-15, 401 unique tests (112.3 of which were required) were administered across subjects to students in 66 Great City School systems. An average student took 8 standardized tests per year, some to fulfill NCLB requirements and some to meet state and local mandates. Although the opt-out movement has gained some traction, less than 1% of CGCS systems encountered boycotts of standardized tests by students and their parents.

The higher the grade levels, the more tests students encounter in CGCS systems, with high schoolers having a particularly high test burden, including taking federally and state mandated compliance-based tests, formative and mastery, end of course tests in subject areas, and transition, postsecondary related tests.

Multiple layers of regulations guide schools' testing schedules. Although the federal government regulations have set the requirements across the board, states themselves have also imposed additional formative and/or benchmark assessments, making the lines between federal and state mandates blurry.

The study also noted redundancy in the exams, lack of alignment among some tests, and reporting lags, which reduced the utility of the test data informing instructional practices. Although Dr. Hart acknowledges the importance of tracking student progress to inform policy, he also underscores the importance of meaningful measurements that help teachers track students' content knowledge, identifying areas of growth and improvement.

Meaningful student comparisons are difficult to discern. As Dr. Hart points out, between 2011

and 2013, in half of the assessed school districts, states changed their NCLB standardized tests at least once. In 2014-15 school year, 65% of the districts changed their assessments again (most opting for either PARCC or SBAC). Given the diversity of state assessments students take over time and across the states, comparing students' progress becomes a challenging proposition.

While the study offers an assessment of how much time students spent taking tests in 66 large districts, the study's scope did not calculate the amount of instructional time devoted to test preparation and the variations within and across schools, which might offer a deeper picture of the effects testing has had on school culture and classroom practices.

ESSA is changing the accountability parameters, shifting the power of decision-making back to the states, and also adding non-academic measures to the mix. The new law offers an opportunity to reimagine assessments, but will they remain standardized or move towards a more individual-centered approach? Will the new assessments recognize the role of non-academic factors in student learning? How will your state respond to the new accountability framework in 2017?

Dr. Raymond C. Hart is the Director of Research for the Council of the Great City Schools and has more than 20 years of experience in research and evaluation. He presented the findings of the student testing study at the monthly American Educational Research Association/Institute for Educational Leadership (AERA/ILE) session in January 2016.

Los Angeles Times

Your kids take 112 tests between pre-K and high school

Joy Resmovits
October 28, 2015

If you live in a big city, your child probably took eight standardized tests this year. On average, kids sit through 112.3 tests between preschool and high school graduation, according to a new [study](#).

Is that too much?

Rancor around standardized testing [dominated headlines](#) this year, with some parents protesting the number, duration and quality of tests students take. But as they rallied, opined and [opted out](#), one question remained unanswered: Precisely how many tests do American students really take, and why?

To answer those questions, the [Council of the Great City Schools](#) and the Council of Chief State School Officers conducted a study on the state of testing in America today. The 164-page study released Saturday scrutinized testing in America's biggest cities, and found redundancies in tests mandated by government at all levels.

"You've got different entities at differing levels requiring assessments for purposes that aren't connected," said Michael Casserly, who heads the Great City Schools group. "It just adds up to an incoherent disconnected system."

[The Times' new initiative to inform parents, educators and students across California >>](#)

The findings reflect states' efforts to implement new tests associated with the [Common Core](#) State Standards, a set of [learning goals](#) in English and math adopted by most states.

The results come before a busy week for standardized testing in the U.S. On Wednesday, the federal government is expected to release scores for the National Assessment of Educational Progress, the only national standardized test. Also this week is what some policymakers believe to be the small window Congress has to reconcile [two competing House and Senate bills](#) to replace the No Child Left Behind Act before House Speaker John Boehner (R-Ohio) leaves. At the center of the differences between the two bills is testing.

"Testing participation and test output and how to handle all that is one of the key unresolved issues," said Kati Haycock, who heads the Education Trust, a Washington, D.C.-based advocacy group that supports federally mandated standardized tests as a way to see how different groups of students are learning. "Any heat around the testing issue can ricochet."

The study looked at tests in 66 major city public school systems, including Los Angeles Unified. Those districts administered 401 different exams, and students sat for tests more than 6,570 times. Although Casserly did not have data for LAUSD specifically, he said that the overall numbers didn't vary much from one district to another.

In 2014-15, LAUSD actually saw less testing than it previously had. "We were in a transition year," said Cynthia Lim, the director of LAUSD's Office of Data and Accountability, referring to the switch to the new

Common Core exam called Smarter Balanced. Last year, LAUSD did not have “mandated periodic assessments” as in previous years.

Instead, the district made interim tests available to schools, but did not centrally collect the results, Lim said. The Smarter Balanced exams were administered in grades 3-8 and 11, and each subject test clocked in at four hours.

This year, the district is encouraging schools to use the interim tests that Smarter Balanced provides, but schools are not required to do so.

“We’re using this as an experimental year to see how the interim assessments go,” she said. “We have fewer tests than Florida. ... I don’t know what the right mix is. We’re still trying to figure out what our assessment plan and comprehensive view of assessment should be for the next school year.”

Nationally, some educators, parents and others say they believe the emphasis on testing has gone too far.

“I think there is too much testing,” said Morgan Polikoff, a USC Rossier School of Education assistant professor. But he added that the report likely doesn’t reflect the amount of testing outside of cities. “The phenomenon on benchmark testing is an urban phenomenon,” he said.

Officials are listening. On Monday, U.S. Secretary of Education Arne Duncan and his deputy — and named successor — [John King](#) are hosting a panel to address the report. Also on Saturday, the Obama administration is releasing a “testing action plan” that lays out a pathway for fixing standardized testing in America.

The plan says that the only tests that should be given are those that are “worth taking,” meaning that they’re relevant; “high quality,” meaning that they require a student to use material in a complex manner; and “time-limited,” meaning that they take up no more than 2% of class time. Tests should also be “fair,” meaning that they’re accessible for students with disabilities, and “fully transparent,” meaning that parents receive information on the tests’ purpose.

“I can’t tell you how many conversations I’m in with educators who are understandably stressed and concerned about an overemphasis on testing in some places and how much time testing and test prep are taking from instruction,” Duncan said in a statement.

The U.S. Education Department is trying to reduce the burden of testing on students by adding these criteria to grants and asking Congress for funding to develop better tests.

The federal government also committed to releasing “clear guidance” on how to use federal money for testing audits by January 2016. It will establish “office hours” for states with testing questions to get help. Previously, the feds have invited states to apply for waivers to get out of certain extra testing requirements, an offer [California has put into place](#).

“Duplicative, unnecessary or poor-quality, low-level tests subtract from learning time and undermine instruction,” King said. “There are too many tests that do not provide useful information.”

Students Take Too Many Redundant Tests, Study Finds

Denisa R. Superville

October 24, 2015

Students across the nation are taking tests that are redundant, misaligned with college- and career-ready standards, and often don't address students' mastery of specific content, according to a long-awaited report that provides the first in-depth look at testing in the nation's largest urban school districts.

The comprehensive report by the Washington-based [Council of the Great City Schools](#) examines testing in 66 of the council's 68 member school districts, looking at the types of tests administered, their frequency, and how they are used. The findings are expected to add hard numbers and evidence to the fractious national debate around whether U.S. students are being overtested.

The study found, for instance, that 8th grade students in an urban district spent an average of 4.22 school days taking mandatory tests last school year—the most test-taking time of any grade level. That's not counting optional tests and those given periodically by teachers to gauge student progress. And the results of mandated tests were often returned to districts months after they had been taken, reducing their usefulness for classroom instruction.

While national testing debates are often characterized by finger-pointing as to who is responsible for the aggressive testing regime, the council's report found that everyone—including classroom teachers, principals, districts, states, the federal government, and testing companies—bears some responsibility.

"The overarching take-away for us was that everybody was culpable here in one way or another," said Michael Casserly, the executive director of the Council of the Great City Schools. "There were so many actors involved, and there was so little coordination across them, that you ended up with an assessment system that was not terribly strategic."

On Saturday, the Obama administration acknowledged some responsibility for the increased amount of testing in schools and [released principles to help states and school districts dial back on assessments](#), including ensuring that students do not spend more than 2 percent of classroom instructional time sitting for tests. It also called for Congress to scale back on testing in the reauthorization of the Elementary and Secondary Education Act.

U.S. Secretary of Education Arne Duncan and Deputy Education Secretary John King [participated in a panel discussion in Washington on Monday](#) to discuss how to improve assessments in the nation's schools.

Range of Findings

Among the report's other findings:

- Students in the 66 districts took 401 unique tests last year.

- There is no correlation between time spent testing and improved math and reading scores.
- Students in the 66 systems sat for tests more than 6,570 times last year.
- While testing for pre-K pupils was less common, even they were not exempt.
- Thirty-nine percent of districts waited two to four months to receive state test results.
- Tests were used for purposes for which they were not designed, such as evaluating school staff.

Time Spent on Test-Taking

A study by the Council of the Great City Schools, which represents the nation's largest urban school districts, found that students spend a lot of time taking tests. Some of those tests are redundant, and others are used for purposes for which they were not designed. Eighth graders spent an average of 25.3 hours—or more than four school days—taking mandatory tests in the 2014-15 school year, the highest number of hours in any of the tested grades, according to the study.

The report found that the time students spent taking tests differed from district to district. In St. Paul, Minn., for example, which the council characterized as a "low test" district, students spent an average of 10.8 hours a year taking mandatory tests. In Detroit, a "high test" district, that number was 30.5 hours.

While testing costs made up a small portion of the districts' total budgets, they did add up. The Hillsborough County, Fla., district, for example, spends about \$2.2 million of its estimated \$1.8 billion budget on testing, according to the report.

Richard Carranza, the superintendent of the San Francisco school district and the chairman of the council's board, said in a statement that with the increased focus on improving academic outcomes in the nation's urban schools, it was important to "have actionable data that can be used to guide instruction and help us focus on reducing learning gaps." He called the study "an important tool that will guide how we move forward to improve our local testing environments."

In a conference call with reporters Oct. 23, three urban superintendents from Orange County, Fla., Cleveland, Ohio, and San Francisco noted the importance of the report in the national debate around testing.

Barbara Jenkins, the superintendent of Orange County schools, said it comes at the right time to refocus the conversation around assessments, the purpose behind those assessments, "and what is really reasonable."

Eric Gordon, the CEO of Cleveland Metropolitan School District, said district leaders believed that there was value in assessments — including to inform instruction and also to hold school leaders publicly accountable for their students' performance.

The superintendents said that it was important that the tests provide districts with actionable data to use to help their students.

Gordon said the report also "helps us to figure out what is the right way to consider how to assess our students, as opposed to the debate in the nation of whether we should or should not."

Carranza, from San Francisco, said the report highlights the need to have high-quality tests and high-quality assessments.

"A test for a test's sake is not sufficient in our schools," he said. "They must be actionable, they must be robust, they must be rigorous, but they must be tied to a defined outcome, and they must actually measure for that defined outcome."

Nobody 'Asked the Question'

The council's board of directors commissioned the two-year testing review in 2013, realizing that the national discussion around testing was not always grounded in good evidence, Casserly said.

"Nobody had really asked the question before about how much testing there really was in our schools," he said.

Opposition to testing, which increased under the No Child Left Behind Act, has grown with the advent of the widely adopted Common Core State Standards. The backlash spawned an opt-out movement, as some parents chose not to have their children participate in the tests developed to align to the newer, more rigorous standards.

National data on the extent of that movement, however, have been hard to come by. Among the council districts, opt-out rates varied from 20 percent in Rochester, N.Y., to less than 1 percent in many of the districts. The median figure across the districts was less than 1 percent.

Since the review was commissioned, many states and districts have taken steps to cut back on the number of tests they administer.

Duval County schools, in Jacksonville, Fla., reduced the number of district-required assessments at the elementary school level to 10 from 23 and at the secondary school level to 12 from 29. And a study released in June by the Council of Chief State School Officers, the Washington-based organization that represents the top education officials in the states, showed that at least 39 states were working on reducing unnecessary tests.

Next Steps

Chris Minnich, the CCSSO's executive director, said the organization will use the new data to inform its efforts around improving the quality of assessments and [reducing redundancies](#). (The CCSSO was a key player in the common-core effort.)

"We need to continue to work together to have a frank dialogue around which tests provide valuable information," Minnich said.

The report comes with recommendations for the state and federal governments and local school districts. It suggests that the federal government maintain oversight for annual statewide testing for all students in reading and math in grades 3 to 8 and once in high school. It also recommends that states cut down on the time it takes for districts and schools to get test results.

It calls for revisiting the U.S. Department of Education's policy of using test scores and student learning objectives in untested grades for teacher evaluations, and it urges extending the one-year testing exemption for recently arrived English-language learners. It also calls for more consistency in the annual assessments that states use for accountability purposes.

The report recommends that districts review their tests to reduce duplication, attend to the quality of tests before adopting them, and ensure that tests are really assessing how students are doing.

The council plans to keep monitoring how the nation tests its students. The next phase includes creating a commission of researchers, parents, and educators to develop a more "thoughtful," "rational" and "intelligent" system. The commission members will be named within the next two weeks, Casserly said.

Louisville Courier-Journal

JCPS stops requiring diagnostic tests

Allison Ross, 10:41 p.m. EST February 4, 2016

Responding to concerns about over-testing of students, Jefferson County Public Schools has announced it is not requiring teachers to give students diagnostic tests for the rest of the year.

The move means significantly fewer mandated tests for students in first grade through high school. For instance, a third grader could be subjected to eight fewer diagnostic tests through the end of the year, JCPS said.

Diagnostic tests are basically pre-tests at the beginning of each unit to use as a starting point for students' knowledge, JCPS said. Other district-mandated tests, including proficiency exams, are still required, as are any state-mandated standardized tests.

JCPS has required the diagnostic tests for several years, said Dena Dossett, JCPS' chief of data management, although she said there was some flexibility on whether teachers used the district's test or created their own diagnostic assessment.

JCPS said the decision to no longer mandate the diagnostic tests aligns with the district's new vision statement and strategic plan, which calls in part for the state's largest school district to "reduce, revise and refine" its assessments and also reduce reliance on standardized multiple-choice tests.

"This will move us in the direction of less testing and more time to teach, which is exactly what Vision 2020 is all about," Superintendent Donna Hargens told The Courier-Journal.

Board member Steph Horne, who has pushed for fewer tests, said she was happy to see the district make diagnostic testing optional. "This puts the decision-making at the school level. I think decisions are made closer to the child are best."

Brent McKim, president of the county's teachers union, agreed that the move was "good news for schools and students," saying the union has been advocating for some time about cutting back on the time spent on testing in order to provide more learning time for students.

But McKim said he was disappointed that JCPS had not discussed the decision more with stakeholders first.

"Once again, no one at JCPS even discussed this with us," McKim said. "While this may be a positive direction, it is disappointing that yet another decision was made in such a top-down fashion."

Board chairman David Jones Jr. said he was surprised that the teachers union would be surprised by the move, noting that the board approved the idea at a meeting as part of a vote on JCPS' Comprehensive District Improvement Plan.

He also said the idea of reducing tests was discussed at length in working groups and meetings leading up to the formulation of Vision 2020, saying that the teachers union was a critical part of those discussions.

"It's important schools have the opportunity to free up time from tests they find non-helpful to focus on things that are more individually relevant to the students they serve," Jones said.

A JCPS spokeswoman said the district will later review whether it wants to continue making the diagnostic tests optional in future school years.

Bob Schaeffer, spokesman for FairTest: National Center for Fair & Open Testing, said JCPS is joining many other school districts and states around the country who are making the conscious decision to limit the number of mandated tests that students must take.

He pointed to a study by the **Council of Great City Schools** that found that the average student in a big city public school will take about 112 mandated standardized tests in their school careers, with the average of roughly eight standardized tests per year consuming between 20 and 25 hours each school year.

"States are responding to the message from education stakeholders that enough is enough," Schaeffer said.

He said he thinks that most of the mandated diagnostic tests have no educational value, saying that teachers generally know how each student is doing from observing their work.

"There are chapter tests, book reports, final exams," Schaeffer said. "Teachers are already assessing their students."

Hargens earlier this week testified before the House Education Committee in favor of House Bill 92, which would allow Districts of Innovation - of which JCPS is one - to have more flexibility with testing and use more locally developed tests.

Tiffany Dunn, a teacher at Lassiter Middle and an opponent of over-testing, said she hasn't given a district diagnostic test in a while, preferring instead to create her own.

She said she's kept hers short and appropriate for her English as a Second Language students.

Dunn said she wished the district and state would give even more flexibility on assessing students.

"We're professionals," she said. "We should give our own diagnostics and our own proficiencies. ... Why can't teachers create what's best for their students?"

TESTING EDITORIALS

The New York Times

Dialing Back on School Testing

The Editorial Board

October 29, 2015

President Obama struck just the right balance last week when he addressed the highly contentious issue of student testing. He [urged](#) state and local officials to do away with the many meaningless, make-work tests they give each year, while preserving essential, high-quality exams that allow them to tell whether students are making progress and, importantly, whether minority children are being fairly educated.

The [president's comments](#) come at a time when school districts across the nation have angered parents by deluging children with trash exams that serve only to heighten classroom anxiety and eat up precious instructional time.

Congress made a reasonable decision a decade ago when it required the states to give annual math and reading tests in grades three through eight, and once in high school, in exchange for federal education aid. Schools that failed to meet performance targets for two years were labeled as needing improvement and subjected to sanctions.

But Congress could not have [anticipated the reaction](#) — more precisely, the overreaction — among school officials who, afraid of being tagged as low-performing, rolled out wave after wave of “diagnostic” exams that were actually practice rounds for the real thing. Worse still, districts often deployed primitive, fill-in-the-bubble exams that gave no sense at all of whether or not children were developing the writing and reasoning skills essential for jobs in the new economy. These junk exams are sometimes still used even after the curriculum they were based on has been abandoned.

The scope of the problem is outlined [in a new study](#) from the **Council of the Great City Schools**, which represents the country's large urban districts. It shows that the typical student in 66 of these districts takes about eight standardized tests a year, only two of which are required by the federal government. On average, students are required to take an astonishing 112 standardized tests between prekindergarten and 12th grade. The report found that more test time does not pay off in improved learning as measured by student performance on the rigorous, federally backed math and reading exam known as the National Assessment of Educational Progress.

The Obama administration is rightly urging the states to give fewer tests and to choose exams that are clearly tied to student learning. To that end, Mr. Obama is asking Congress for a total of \$403 million to be used by the states to put in place tests that are aligned with college- and career-ready learning standards. In addition, the Department of Education will give the states guidance in how to improve their testing programs.

The administration [suggests](#) further that states require students to spend no more than 2 percent of classroom time taking required statewide standardized tests. Professional organizations and think tanks are already resisting that idea. They worry that such a measure would be burdensome to administer and would limit their flexibility.

Congress can help to de-emphasize testing by changing how schools are evaluated under the Elementary and Secondary Education Act. Student test scores should continue to be an important factor, but modest weight should also be given to other indicators, like advanced courses, promotion rates and college matriculation. These common sense measures would help the country dial back the testing mania.

The Washington Post

Bad tests

By Editorial Board November 8 at 8:12 PM; print edition November 9, 2015

A NEW [REPORT on student testing](#) is prefaced with the observation that testing in the nation's schools is the most hotly debated issue in public education today, with some of the debate well-informed and some "self-serving and misleading." The truth of the latter point was driven home with the simultaneous recommendation from the [Obama administration](#) to [federally cap the amount of time spent on standardized tests](#). There is a need for a smarter system of assessing students, but the real problem is not the time the tests take but the fact that too many of them are poorly designed or without real purpose.

The incoherence of how students are tested emerges from a comprehensive examination by the [Council of the Great City Schools](#) of testing practices and policies in the country's largest urban school districts. The report concludes that students take tests that are redundant and misaligned with college- and career-readiness standards. The tests often do not gauge mastery of specific content and are not used for the purposes for which they were designed. Moreover, the delay in receiving some results undermines efforts to support student growth. Clearly there is a need for a more rational system for assessing progress and improving student achievement.

Instead, there was the disconcerting call by the Obama administration for Congress to put a cap on assessments so no child would spend more than 2 percent of classroom time taking tests. Never mind that the vast majority of tests are state and local, and that those officials are better placed to strike a balance. As the report shows, the amount of time involved really can't be

called excessive: For eighth-grade students (who are tested the most), the average amount of testing time in 2014-2015 was 2.34 percent of school time, or 4.22 days. “What happens if somebody puts a cap on testing, and to meet the cap ends up eliminating tests that could actually be helpful, or leaves the redundancy in the test and gets rid of a test that teachers can use to inform their instruction?” the council’s executive director, Michael Casserly, asked about the administration’s bean-counting approach.

Far more constructive are other administration proposals to provide technical assistance and funds for districts that want to assess and improve their systems. Also important was the administration’s reaffirmation of the need to maintain the yearly testing under the No Child Left Behind law, which provides critical empirical data on whether students are on track with learning and on where they need improvement.

Schools should certainly cut out the drill prep that has soured the school experience and focus on instruction. But they must leave in place tests that reliably measure what students have learned.

Streamline standardized tests: Our view

[The Editorial Board](#) 5:28 p.m. EST November 1, 2015

Compromising on this issue is itself a test of the ability to do right by students.

Standardized tests — the favorite target of conservatives, teachers' unions, many school officials and parents — faced a new barrage of criticism in recent days.

A respected group of [urban school leaders highlighted](#) the burdensome, often redundant, number of tests students take to fulfill federal, state and district requirements. The Obama administration, which until that report had never met a test it didn't like, immediately did a 180, acknowledging that [testing needs to be reduced](#). Finally, [scores announced last week](#) on the nation's gold-standard math test fell for the first time in 25 years. Reading scores either flat-lined or dropped.

All this could turn out to be good news for education — if it spurs needed changes. But that will happen only if the administration, state officials, teachers' unions and Republicans and Democrats in Congress can call a truce in their bitter war over testing and agree to some smart trade-offs. Yes, streamline the testing regime. No, don't eliminate mandated tests that provide long-needed accountability and don't drop test progress as part of teacher evaluations.

The war over testing has been waged almost since the 2002 passage of President George W. Bush's No Child Left Behind law, which, for the first time, required annual statewide assessments of students. The law's major accomplishment, achieved through that yearly testing, was to shine a harsh light on schools with low performance or lagging achievement among minority groups.

Using tests for accountability was a sound idea. It went wrong not because of testing but because of the unattainable goal attached to it. The law demanded that every child in every state be proficient in math and reading by 2014.

Many states dumbed down the proficiency standard on their tests to make it appear students were doing better. Even then, by 2009, nearly 13% of the nation's 100,000 schools were failing to improve adequately.

In an effort to fix the broken system, the Obama administration allowed states to obtain waivers, but to get one, states were encouraged to evaluate teachers using students' progress measured by tests. Another sensible idea, but one that inflamed teachers and their unions and spurred states to add a dizzying array of new tests on top of the basics of math, reading and science. Since then, the battles over testing have escalated and now involve a rogue movement of parents opting their children out of tests.

With Congress writing a new education measure to replace NCLB, the federal government has a fresh opportunity to deal with testing problems and improve education.

A road map for success ought to:

- Keep the required statewide annual testing in the basics, math and reading, and continue to make school-by-school scores public. Parents deserve to know how well or poorly both their child and their school is doing.
- Take a cue from the [Council of the Great City Schools](#), which found not just a large number of mandated tests in the [66 districts it studied](#), but also an “unwieldy, incoherent, at times illogical testing system” with mandates from every level of government that take up an average 2.34% of class time for eighth-graders — the grade with the most mandated testing time. The federal government accounts for just [two of those tests annually](#). “Everyone has some culpability,” says Michael Casserly, the group’s executive director. And everyone has “a role in improving the situation.”
- Continue to evaluate teachers, in part, on the progress their students make on required yearly assessments. To make evaluations comprehensive, include classroom observations by principals and outside experts and student surveys of teachers. The argument that test scores should play no role in evaluating teachers eliminates the single objective measure of a teacher’s major mission: helping students progress.
- Acknowledge that the federal government is too far away to manage schools. Leave more of the governance to teachers, principals, local school districts and states. President Obama could start by dropping a silly idea to encourage states to [cap testing at 2% of classroom time](#). The last thing schools need is another number to meet, measure and record. .

Testing is just one part of the complicated puzzle of improving schools, one of the nation’s most politically charged issues. Finding compromise on this issue is itself a test of the ability of Congress, the president, states, teachers and parents to do right by the nation's children.

Education Week

[Too Much Testing in U.S. Schools: The Department of Education's 'Mea Culpa'](#)

Marc Tucker

October 27, 2015

A new report from the [Council of the Great City Schools](#) has done what seemingly nothing or no one has yet been able to do: Convince the current administration that the rampant [over-testing in U.S. schools](#) is proving harmful for the quality of education that our students receive.

The report found that students take, on average, more than 112 standardized tests between pre-K and grade 12, with the average student taking about eight standardized tests per year. Some are intended to "fulfill federal requirements under No Child Left Behind, NCLB waivers, or Race to the Top (RTT), while many others originate at the state and local levels. Others were optional."

Now the administration is signaling [that they see the error](#) of their and their predecessors' ways. Calling for a two percent cap on the amount of classroom time that is spent on testing, and a [host of other proposals](#), the administration's mea culpa is an unexpected demonstration of what can occur when the facts are laid bare for all to see. How much is actually done to reverse the over-testing trend will be decided by the actions of incoming acting Secretary of Education John King.

The tone of flexibility in the Department's announcement is new and welcome, as is its recognition that the Department may share some culpability in the national revolt against testing. Its call for fewer and higher quality assessments is on target, as is its willingness to help the states come up with more sensible approaches.

What I don't see in the administration's proposals is understanding that the vast proliferation of indiscriminate testing with cheap, low quality tests is the direct result of federal education policies beginning with No Child Left Behind and continuing with Race to the Top and the current waiver regime. I offer you one phrase in the Department's announcement in evidence of this proposition: "The Department will work with states that wish to amend their ESEA flexibility waiver plans to reduce testing...while still maintaining teacher and leader evaluation and support systems that include growth in student learning."

But it is precisely the federal government's insistence on requiring testing regimes that facilitate teacher and leader evaluations that include student growth metrics that caused all this over-testing in the first place.

Outstanding principals I've talked with tell me that when tough-minded, test-based accountability came into vogue, they created or found good interventions that came with their own assessments, each keyed to the intervention they were using. They had always done that. But their district

superintendents, also fearful for their jobs under the new regime, mandated other interventions, with their own tests. Then the state piled on with their own mandated programs and tests, all driven by the fear of leaders, at each level, that if student performance did not improve at the required rate, their own jobs were on the line. Few of these interventions were aligned with the new standards or with each other. But time was of the essence. Better a non-aligned instructional program than none at all. Better a cheap test of basic skills they could afford than a much more expensive one they could not afford.

What sent the numbers right over the cliff was pacing. School administrators, focused on having their students score well on the basic skills tests used by the state accountability systems, pushed schools enrolling large numbers of disadvantaged students to figure out where the students needed to be at set intervals during the year. This determined the pace of instruction. It also made it much easier for administrators to get control over the instruction. All that remained was to administer a test at each of those intervals—say every month or couple of months—to see whether the teachers were keeping pace with the scripted curriculum and the students were making enough progress to do well at the end of the semester or year.

Pacing was the drum. Drill and practice was the melody. Each pacing test was a mini-version of the final test to be given by the state. Instantly, for every federally-required test, four to six others just like it were created. But these tests, because there were so many of them, had to be very cheap. In the minds of some people, this was formative evaluation, but, in my mind, its effect was to regiment instruction in a way that the best advocates of formative evaluation never had in mind.

The situation I just described must have seemed a horror to many teachers, especially teachers of disadvantaged students. Whatever discretion they had disappeared. Their lives became a litany of pacing guides, scripted curriculum, drill and practice and a flood of test score data to analyze. In states with letter grade systems of accountability, school administrators quickly figured out how to game the system, concentrating their best teachers on students in the grades with mandated assessments, and, within those grades, on the students just below the thresholds of performance, which, if exceeded, would bump the school's overall grade up. They gave much less attention to the students who were far behind or who were doing well but could have done much better.

The vast proliferation of testing and the widespread use of cheap tests that fail to measure high standards did not happen because state officials did not know what a good test is or because local officials spontaneously concluded that it would be a good idea to greatly expand the use of pacing guides, drill and practice regimens and the tests that come with them. State and district officials used lousy tests and greatly increased their use because they thought they were the only tools available to respond to the federal government's requirements for tough test-based accountability. They were simply responding to the incentives they faced. They still face those incentives, so there is no reason to expect them to behave any differently. Giving them lessons on what good tests look like won't change that. Giving them money to review their testing programs won't change that.

The only thing that will change that would be to change the accountability systems to do less testing with much higher quality tests and to change the accountability regime to put less pressure on the schools and teachers and, instead, create incentives for students to take tough courses and work hard in school. This is exactly what the top performing countries do. We are, as usual, embracing a strategy that has been considered and rejected by the countries with the most successful school systems and rejecting the testing and accountability strategies they have used with great success. If you would like to see a proposal for an accountability strategy [based on their policies on testing and accountability, look here.](#)

The situation for teachers is even more poignant. They have turned against the Common Core not because of the standards themselves, which they like, but because of the way they have been implemented, and, in particular, because of the way they have been used to create teacher evaluation systems. Using a logic I have yet to get my head around, the advocates of teacher evaluation appear to have convinced themselves that teacher and leader evaluation is by itself a highly promising school reform.

The key for great school leaders isn't formal evaluation and it isn't firing people. Only Donald Trump, evidently, fired his way to the top. The key is running a great school that great people want to work in, and then spending a lot of time identifying, recruiting and supporting those great people. Principals who work this way often let their staff know that they expect them to work hard. Those who do not want to work so hard go elsewhere. But these principals do not depend on test-based accountability systems to identify the slackers nor do they depend on test-based accountability systems to identify the teachers they want to hire or to develop them once they are hired.. Why should they? They are in classrooms all the time, talking and observing, coaching and supporting.

The data reported by the Council of the Great City Schools reveal a calamity. The cause is our national accountability system. The flexibility offered by the Department of Education is welcome and refreshing, but it is not the answer. The answer will have to wait for the day when the federal government no longer insists that the states and schools use test-based accountability and value-added strategies to assess individual teachers with consequences for individual teachers. John King did not create this system. Perhaps he can help this country change it. We'll see.

TUDA ARTICLES

Education Week

Six Districts Join NAEP's Trial Urban District Assessment Program

By Denisa R. Superville on March 8, 2016 1:52 PM

Six urban school districts volunteered to join the National Assessment of Education Progress's Trial Urban District Assessment Program, bringing the number of participating districts in the program to 27, [National Assessment Governing Board announced Monday](#).

The districts are: Clark County, Nev.; Denver; Fort Worth, Texas; Guilford County, N.C.; Milwaukee; and Shelby County, Tenn., which includes the city of Memphis.

The districts will be included in the program next year. TUDA, which started in 2000, is a special part of the NAEP, also known as the nation's report card. TUDA collects and reports on 4th and 8th grade student performance in math and reading on the NAEP in select urban school districts.

"We now have an ever-greater geographic representation in TUDA, with four more states included," said Terry Mazany, the chairman of the governing board. "This will provide the nation with an objective picture of the achievement spanning the diversity of our nation's students, recognizing that the majority of students in our nation's schools is now composed of minority populations."

Although the vote to add the new districts took place on Saturday, the expansion was announced on Monday, the same day that leaders from some urban school districts gathered at the Ronald Reagan Building and International Trade Center in Washington to discuss how they use NAEP data to improve instruction. They also shared strategies behind improvements in districts like Chicago, Boston, Miami-Dade, Cleveland, and the District of Columbia.

On Monday, NAEP also released **tools** to allow users to dig deeper into the 2015 assessment data, including ways to compare student performance in TUDA districts with their states' performance and examine achievement gaps over time.

TUDA, which started at the urging of Michael Casserly, the executive director of the **Council of the Great City Schools**, launched with five school districts.

Casserly said Monday that the districts wanted to demonstrate that they were fully committed to the highest academic standards for urban children, compare results with districts facing similar challenges, and gauge the progress and evaluate reforms underway in those districts in ways that could not be done under the 50-state assessment.

Miami Herald

October 28, 2015

Miami-Dade students shine on national ‘gold standard’ test

National Assessments of Educational Progress scores released Wednesday
Miami-Dade students largely outperformed big city peers
Scores across the county dipped, stayed flat in Florida

By Christina Veiga

With testing backlash gripping the country — even prompting President Barack Obama to weigh in — there is one set of exams that education leaders agree is the gold standard.

The National Assessments of Educational Progress stand as a constant measure of student achievement against a backdrop of ever-changing state benchmarks.

The results, released Wednesday, were impressive for Miami-Dade County.

Even as scores across the country experienced an unprecedented slump, Miami-Dade students posted gains in almost every area tested. In fact, the country’s fourth-largest district largely outperformed its other big city peers, posting higher than average scores in most categories.

“This is the gold medal you can hang around the district’s neck, and this is a gold medal that belongs to every student, every teacher,” said Miami-Dade Superintendent Alberto Carvalho.

Fourth- and eighth-graders take the NAEP in math and reading every two years. The exams also break down the performance of 21 large districts, including Miami-Dade.

In fourth-grade math and reading, and in eighth-grade reading, Miami-Dade students performed higher than the average public school student in large cities. The only outlier was eighth-grade math, in which district students were on-par with their peers.

The performance earned Miami-Dade praise from Michael Casserly, executive director of the **Council of Great City Schools**, a national organization of large urban school districts.

“The Miami-Dade County Public Schools simply hit the new NAEP test results out of the park,” Casserly said in a statement. “The school district’s gains were among the fastest in the country of

any major city and were across the board, even as state and national numbers were trending downward.”

Florida did not post the same improvements as its largest district. Statewide, performance was flat or lower in all tested areas.

But there was some good news for the Sunshine State. Students did as well as the national average or better in almost all categories. Only in eighth-grade math did students score below the national average.

Across the country, math scores were down in both grades. In reading, performance sagged among eighth-graders and remained flat in fourth grade.

“It was the first time that we’ve had significant declines in the mathematics exams,” Peggy Carr, acting commissioner for the National Center for Education Statistics, said during a conference call with reporters.

Carr and others urged a long-term view of the data, which show steady improvements since the 1990s. This year also marks the first time NAEP was given after many states moved towards new, tougher learning standards.

“Educators throughout this country have been doing the heavy lifting of some of the biggest changes our schools have seen in decades, retooling their classroom practice to come up to speed with new and higher standards that the large majority of states have adopted,” U.S. Secretary of Education Arne Duncan said during a conference call with reporters. “I’ve said on a number of occasions that we should expect scores in this period to bounce around some, and I think that ‘implementation dip’ is part of what we’re seeing here.”

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The Plain Dealer (Cleveland)

Cleveland schools celebrate small gains on national test while other cities, states lament their fall

By Patrick O'Donnell The Plain Dealer

on October 28, 2015 at 5:22 PM, updated October 28, 2015 at 5:48 PM

CLEVELAND, Ohio -- The national mood today about NAEP, the tests known as "The Nation's Report Card," is one of distress, with anxious and chagrined school officials struggling to explain why their scores went down.

But the Cleveland school district is celebrating -- in a restrained way and with constant reminders that "we have a lot of work to do."

As the district officially announced its new 2015 results at an afternoon press conference, there was strong applause and congratulations all around for its one sizable gain and a few small ones.

The district had the second-highest score gain nationwide in 4th grade reading, and small gains in the other three areas covered by NAEP -- 4th grade math and 8th grade reading and math. Even small gains of a single point or two points - too small for federal officials to consider statistically significant -- are cause for celebration, district CEO Eric Gordon said, after eight years of scores dropping while other districts improved.

This time, Cleveland gained a bit, while most other cities fell.

"We are not here to celebrate victory," Gordon said. "We are here to celebrate progress."

The district, Gordon admitted, still sits near the bottom with its scores and proficiency levels. It's a long journey back to where the district wants to be, he said, but the only way to make that progress is to start moving in that direction.

"We have a long way to go, but these gains are real and really important," he said.

Mayor Frank Jackson, who oversees Gordon and the school board, did not attend the announcement, but praised the district for the gains. Jackson is also co-author of the Cleveland Plan for Transforming Schools, the district's 2012 improvement plan.

"We are making good gains in many areas but we also know that more needs to be done," Jackson said in a press release prepared before the scores were made public overnight. "I am encouraged and believe we have the right programs in place to sustain these gains."

Michael Casserly, executive director of the **Council of the Great City Schools**, said in that same release that the district's gains are "uniformly larger and better than any other school district in the country."

"The community should be encouraged and confident that more improvement is in store to come, as the school system is clearly on the right track," Casserly said.

The district was so proud of those comments from Jackson and Casserly that it printed them on posterboard to display at the press conference.

Casserly, as head of the nation's main association of big city school districts, also mentioned Cleveland this morning at a national press conference about the results.

Though score increases may have been "nominal," few districts saw any at all, he noted. He praised Cleveland for "substantial, across-the board improvements" and a school improvement plan that is "producing substantial academic benefits."

The biggest praise went to the Miami-Dade schools, which had two big gains and two small ones, and the Washington, D.C. schools, who had two large gains along with one setback.

USA Today

New analysis of math, reading scores 'very disconcerting'

[Greg Toppo](#),

January 26, 2016

Decades of bleak results from kids' standardized tests now seem almost routine, but a new study made public Tuesday scratches beneath the surface to pin down just how many students in major U.S. metropolitan areas can actually read or do math proficiently. The results: Startlingly few.

If all of Detroit's fourth-graders took the well-respected National Assessment of Educational Progress (NAEP) tests, just 120 African-American fourth-graders across the entire city, by researchers' estimates, would score "proficient" or above in math.

"This is not a misprint," the authors warn.

Researchers at the Center for American Progress, the left-leaning Washington, D.C., think tank, gathered demographic data about the current crop of students in 21 metropolitan areas and combined it with recent results on the federally administered test of math and reading skills.

Other results:

- In Atlanta, just 60 Hispanic fourth-graders and 40 Hispanic eighth-graders would score proficient or above in reading.
- In Cleveland, only about 30 Hispanic eighth-graders and 80 African-American eighth-graders would be considered proficient in math.
- In Baltimore, an estimated 60 Hispanic fourth-grade students would score proficient in reading.

The figures are estimates based on the demographic data, not actual determinations of individual student scores.

"The problem is stark and very disconcerting," said Ulrich Boser, a CAP senior fellow and lead author of the report.

The idea to reframe the percentages, Boser said, is an attempt to change how people think about achievement. "I just really feel like our brain is not built to easily understand proportions and fractions. We are much more inclined to think of absolute numbers."

He added, “We’ve seen these numbers thrown around a lot and well-analyzed, but we hadn’t seen them put in this context.”

Mike Petrilli, of the right-leaning D.C. think tank the [Thomas B. Fordham Institute](#), said, “The minuscule proportion of poor and minority children in some major American cities who are scoring at ‘proficient’ is surely a tragedy, but it shouldn’t be surprising, given the deep, long-term poverty most of their children face.”

Most of the results come from a subset of NAEP known as the Trial Urban District Assessment, or TUDA, administered in 21 cities and metro areas — not just Cleveland, Detroit and Atlanta, but in places like Duval, Hillsborough and Miami-Dade counties in Florida.

Michael Casserly of the [Council of the Great City Schools](#), which [represents](#) 67 urban districts, said its members created TUDA in 2000 “so we could tell where we were doing well, where we were showing improvements, and where we need improvement.”

The researchers suggest that cities and states that have committed to higher academic standards such as the heavily debated Common Core have seen “clear gains” in student proficiency. In Massachusetts, for instance, the percentage of fourth-graders scoring proficient or above in math rose from 41% in 2003 to 54% a decade later. The sheer number of new fourth-graders doing math proficiently or better? About 7,000, the researchers suggest.

In Florida, a similar jump meant about 22,000 more fourth-graders scored proficiently or higher in math; and in Washington, D.C., about 1,000 more fourth-graders scored proficiently or higher in both math and reading.

D.C. Schools Chancellor Kaya Henderson said the improvements appeared “because we have raised our standards, aligned our curriculum to those standards, worked to engage our students and families, and have the strongest workforce in the country working to improve the outcomes of all of our students.”

Petrilli, a proponent of charter schools, said implementing higher standards is worth supporting. “But that’s not going to be enough for the disadvantaged urban children (the researchers) write about. For them, incredible schools are necessary to give them a shot at transcending their current circumstances, and I’m doubtful that traditional school districts can deliver that.”

OTHER ARTICLES

Education Week

School Lunch Compromise Moves Forward in Congress

By [Evie Blad](#) on January 20, 2016 12:08 PM|

The Senate Agriculture Committee approved a bill Wednesday morning that would reauthorize child nutrition programs, including the National School Lunch and Breakfast programs. The bill would [ease the controversial nutrition standards](#) created under the Healthy, Hunger-Free Kids Act (the current version of the law), though it would not eliminate as many of the provisions as some child health organizations had feared.

"What makes our country so great is that we never back down from a challenge when we have the opportunity to improve the lives of our children," ranking member Sen. Debbie Stabenow, D-Michigan, said in the committee meeting, citing work to negotiate a compromise. The bill now faces consideration by the Senate. It drew praise from advocacy groups on all sides of the nutrition debate, but some school administrator groups said it wouldn't go far enough to ease administrative burdens and costly provisions.

As I outlined Friday, [the bill would:](#)

- Delay new sodium restrictions from 2017 to 2019;
- Ease requirements so that only 80 percent of grain items must be whole-grain rich, rather than 100 percent;
- Maintain requirements that schools serve fresh fruits and vegetables;
- Provide grants and loan assistance for school kitchen equipment upgrades; and
- Create new requirements for verifying eligibility of some participating students.
-

Praise for Compromise

"The School Nutrition Association greatly appreciates the leadership of the Senate Agriculture Committee in crafting a bipartisan reauthorization bill that offers practical solutions for school meal programs and the students they serve," School Nutrition Association President Jean Ronnei said in a statement.

The organization, which had criticized the nutrition standards, praised the bill's inclusion of school equipment grants and changes to the administration of school meal programs. The National School Boards Association called the bill "an important and promising first step toward incorporating the local school district governance perspective in [implementation of school meal programs.](#)"

Health advocacy groups that argued strenuously against changes to the school lunch rules also praised the bill. Among them, the Pew Charitable Trusts Kids' Safe and Healthful Foods Project. "This proposal ensures that good nutrition remains the core ingredient in school meal programs," Jessica Donze Black, the project's director, said in a statement.

Continued Concerns

But some groups that represent districts and educational administrators opposed the legislation in letters to the committee this week.

"The bill simply [does not adequately address important operation and financial issues](#) that exist in the current federal school meal programs," Michael Casserly, the executive director of the [Council of the Great City Schools](#) wrote.

"In short, the Committee bill basically leaves in place the current federal requirements that limit local menu flexibility, restrict school cafeteria revenue, contribute to less attractive food offerings, reduce student participation in school meals, create plate waste, and increase local costs," [the letter](#) says. "Moreover, the proposed new verification requirements appear to add to local administrative costs and may result in otherwise eligible low-income students being excluded from federal subsidized meals—another cost that most school districts will then absorb without federal reimbursement."

AASA, the School Superintendents Association, said new verification requirements and program rules would come as school districts are also transitioning to the Every Student Succeeds Act. The organization also [criticized the new verification requirements](#) and said the bill wouldn't address all of its concerns with federal meal programs.

"The priorities we advanced in reauthorization represented modifications, not complete overhauls, and we remain concerned that the proposed changes aren't substantive enough to provide meaningful relief to schools," AASA legislative analyst Leslie Finnan wrote to the committee.

Education Week

Published February 3, 2016

PARCC Scores Lower for Students Who Took Exams on Computers

By **Benjamin Herold**

Students who took the 2014-15 PARCC exams via computer tended to score lower than those who took the exams with paper and pencil—a revelation that prompts questions about the validity of the test results and poses potentially big problems for state and district leaders.

Officials from the multistate **Partnership for Assessment of Readiness for College and Careers** acknowledged the discrepancies in scores across different formats of its exams in response to questions from *Education Week*.

“It is true that this [pattern exists] on average, but that doesn’t mean it occurred in every state, school, and district on every one of the tests,” Jeffrey Nellhaus, PARCC’s chief of assessment, said in an interview.

“There is some evidence that, in part, the [score] differences we’re seeing may be explained by students’ familiarity with the computer-delivery system,” Nellhaus said.

In general, the pattern of lower scores for students who took PARCC exams by computer is the most pronounced in English/language arts and middle- and upper-grades math.

Hard numbers from across the consortium are not yet available. But the advantage for paper-and-pencil test-takers appears in some cases to be substantial, based on independent analyses conducted by one prominent PARCC state and a high-profile school district that administered the exams.

In December, the Illinois state board of education found that 43 percent of students there who took the PARCC English/language arts exam on paper scored proficient or above, compared with 36 percent of students who took the

exam online. The state board has not sought to determine the cause of those score differences.

Meanwhile, in Maryland's 111,000-student Baltimore County schools, district officials found similar differences, then used statistical techniques to isolate the impact of the test format.

They found a strong "mode effect" in numerous grade-subject combinations: Baltimore County middle-grades students who took the paper-based version of the PARCC English/language arts exam, for example, scored almost 14 points higher than students who had equivalent demographic and academic backgrounds but took the computer-based test.

"The differences are significant enough that it makes it hard to make meaningful comparisons between students and [schools] at some grade levels," said Russell Brown, the district's chief accountability and performance-management officer. "I think it draws into question the validity of the first year's results for PARCC."

4 of 5 PARCC Exams Taken Online

Last school year, roughly 5 million students across **10 states and the District of Columbia** sat for the first official administration of the PARCC exams, which are intended to align with the Common Core State Standards. Nearly 81 percent of those students took the exams by computer.

Scores on the exams are meant to be used for federal and state accountability purposes, to make instructional decisions at the district and school levels, and, in some cases, as an eventual graduation requirement for students and an eventual evaluation measure for teachers and principals.

Several states have since dropped all or part of the PARCC exams, which are being given again this year.

PARCC officials are still working to determine the full scope and causes of last year's score discrepancies, which may partly result from demographic and academic differences between the students who took the tests on computers and those who took it on paper, rather than the testing format itself.

Assessment experts consulted by *Education Week* said the remedy for a “mode effect” is typically to adjust the scores of all students who took the exam in a particular format, to ensure that no student is disadvantaged by the mode of administration.

PARCC officials, however, said they are not considering such a solution. It will be up to district and state officials to determine the scope of any problem in their schools’ test results, as well as what to do about it, Nellhaus said.

Such uncertainty is bound to create headaches for education leaders, said Michael D. Casserly, the executive director of the **Council of the Great City Schools**, which represents 67 of the country’s largest urban school systems.

“The onus should be on PARCC to make people aware of what these effects are and what the guidelines are for state and local school districts to adjust their data,” Casserly said.

Comparing Online and Paper Tests a Longstanding Challenge

The challenges associated with comparing scores across traditional and technology-based modes of test administration are not unique to PARCC.

The **Smarter Balanced Assessment Consortium**, for example, told *Education Week* that it is still investigating possible mode effects in the results from its 2014-15 tests, taken by roughly 6 million students in 18 states. That consortium—which, like PARCC, offers exams aligned with the common core—has yet to determine how many students took the SBAC exam online, although the proportion is expected to be significantly higher than in PARCC states.

Officials with Smarter Balanced are in the early stages of preparing technical reports on that and other matters.

“We’ll analyze the operational data. I can’t speculate in advance what that implies,” Tony Alpert, the executive director of Smarter Balanced, said in an interview. “We don’t believe that differences in scores, if there are any, will result in different decisions that [states and districts] might make based on the test.”

States that administer their own standardized exams, meanwhile, have for years conducted comparability studies while making the transition from paper- to computer-based tests. Past studies in Minnesota, Oregon, Texas, and Utah, for example, have returned mixed results, generally showing either a slight advantage for students who take the tests with paper and pencil, or no statistically significant differences in scores based on mode of administration.

The National Center for Education Statistics, meanwhile, is studying similar dynamics as it moves the National Assessment of Educational Progress, or NAEP, **from paper to digital-administration platforms**.

An **NCES working paper released in December** found that high-performing 4th graders who took NAEP's computer-based pilot writing exam in 2012 scored "substantively higher on the computer" than similar students who had taken the exam on paper in 2010. Low- and middle-performing students did not similarly benefit from taking the exam on computers, raising concerns that computer-based exams might widen achievement gaps.

A still-in-process analysis of data from a study of **2015 NAEP pilot test items** (that were used only for research purposes) has also found some signs of a mode effect, the acting NCES commissioner, Peggy G. Carr, told *Education Week*.

"The differences we see across the distribution of students who got one format or another is minimal, but we do see some differences for some subgroups of students, by race or socioeconomic status," she said.

One key factor, according to Carr: students' prior exposure to and experience with computers.

"If you are a white male and I am a black female, and we both have familiarity with technology, we're going to do better [on digitally based assessment items] than our counterparts who don't," she said.

The NCES is conducting multiple years of pilot studies with digitally based items before making them live, in order to ensure that score results can be compared from year to year.

A PARCC spokesman said the consortium did analyze data from a 2014 field test of the exam to look for a possible mode effect, but only on an item-by-item basis, rather than by analyzing the exam taken as a whole. The analysis found no significant differences attributable to the mode of administration.

When asked why 2014-15 test scores were released to the public before a comprehensive analysis of possible mode effects was conducted, Nellhaus, PARCC's chief of assessment, said responsibility rests with the states in the consortium. "People were very anxious to see the results of the assessments, and the [state education] chiefs wanted to move forward with reporting them," Nellhaus said. "There was no definitive evidence at that point that any [score] differences were attributable to the platform."

Illinois, Baltimore County Find Differences in PARCC Scores By Testing Format

The Illinois state school board made its PARCC results public in mid-December. In a press release, it made indirect mention of a possible mode effect, writing that the board "expects proficiency levels to increase as both students and teachers become more familiar with the higher standards and the test's technology."

A [comparison of online and paper-and-pencil scores](#) done by the state board's data-analysis division was also posted on the board's website, but does not appear to have been reported on publicly.

That analysis shows often-stark differences by testing format in the percentages of Illinois students who demonstrated proficiency (by scoring a 4 or 5) on PARCC English/language arts exams across all tested grades. Of the 107,067 high school students who took the test online, for example, 32 percent scored proficient. That's compared with 50 percent for the 17,726 high school students who took the paper version of the exam.

The differences by format are not so pronounced in elementary-grades math; in grades 3-5, in fact, slightly higher percentages of students scored proficient on the online version of the PARCC exam than on the paper version.

But proficiency rates among paper-and-pencil test-takers were 7 to 9 points higher on the 8th grade and high school math exams.

The Illinois board has not conducted any further analysis of the results to determine the cause of those discrepancies. Board officials declined to be interviewed.

“The statewide results in Illinois suggest some differences in performance between the online and paper administrations of the assessment,” according to a statement provided by the board. “There is no consistent relationship from district to district. ... Both versions of the test provide reliable and valid information that teachers and parents can use to identify student strengths and areas needing improvement.”

In Maryland, meanwhile, more than 41,000 Baltimore County students in grades 3-8 took the PARCC exams in 2014-15. Fifty-three percent of students took the math exam online, while 29 percent took the English/language arts exam online. The mode of test administration was decided on a school-by-school basis, based on the ratio of computers to students in each building’s largest grade.

Like Illinois, Baltimore County found big score differences by mode of test administration. Among 7th graders, for example, the percentage of students scoring proficient on the ELA test was 35 points lower among those who took the test online than among those who took the test on paper.

To identify the cause of such discrepancies, district officials compared how students and schools with similar academic and demographic backgrounds did on each version of the exams.

They found that after controlling for student and school characteristics, students were between 3 percent and 9 percent more likely to score proficient on the paper-and-pencil version of the math exam, depending on their grade levels. Students were 11 percent to 14 percent more likely to score proficient on the paper version of the the ELA exam.

“It will make drawing comparisons within the first year’s results difficult, and it will make drawing comparisons between the first- and second-year [PARCC

results] difficult as well,” said Brown, the accountability chief for the Baltimore County district.

“This really underscores the need to move forward” with the district’s plan to move to an all-digital testing environment, he said.

A Big ‘Bug in the System’

In the meantime, what should state and district leaders, educators, and parents make of such differences?

The test results still have value, said Nellhaus of PARCC.

“This is still useful and important information providing a wealth of information for schools to improve instruction and identify students who need assistance or enrichment,” he said.

But possible mode effects on multistate-consortia exams should be taken seriously, at least in the short term, and especially if they have not been accounted for before test results are reported publicly, said assessment experts consulted by *Education Week*.

“Because we’re in a transition stage, where some kids are still taking paper-and-pencil tests, and some are taking them on computer, and there are still connections to high stakes and accountability, it’s a big deal,” said **Derek Briggs**, a professor of research and evaluation methodology at the University of Colorado at Boulder.

“In the short term, on policy grounds, you need to come up with an adjustment, so that if a [student] is taking a computer version of the test, it will never be held against [him or her],” said Briggs, who serves on the technical-advisory committees for both PARCC and Smarter Balanced.

Such a remedy is not on the table within PARCC, however.

“At this point, PARCC is not considering that,” Nellhaus said. “This needs to be handled very locally. There is no one-size-fits-all remedy.”

But putting that burden on states and school districts will likely have significant implications on the ground, said Casserly of the Council of the Great City Schools.

"I think it will heighten uncertainty, and maybe even encourage districts to hold back on how vigorously they apply the results to their decisionmaking," he said.

"One reason many people wanted to delay the use [of PARCC scores for accountability purposes] was to give everybody a chance to shake out the bugs in the system," Casserly added. "This is a big one."

Politico

On the Hill today: Implementing ESSA

By [Caitlin Emma](#)

02/10/16 10:00 AM EST

— **Obama did request more Title I funding in his budget** than Congress spelled out for the program this year in ESSA, but advocates are worried that school districts could take a cut in Title I funding this year because of specifics of the new law. “We don't think it's quite the 'house on fire worry' that some of the questions we have received would suggest,” said Amy McIntosh, delegated the duties of assistant secretary of the Office of Planning, Evaluation and Policy Development. “We cannot tell from where we sit how many [districts] will experience any decrease at all and many of those who do will quite probably receive money back from the school improvement.” Jeff Simering of the **Council of the Great City Schools** countered, “Whether it is the result of the increased State Title I set-aside or the FY17 Title I budget proposal, we see no reason for school districts to have to suffer even ‘smoke or non-structural damage’ to their local Title I allocations in the first year of ESSA implementation.”

Education Week

ELL Advocates Hopeful and Wary of New Federal K-12 Law

By **Corey Mitchell** (Published online January 5, 2016 and in print on January 6, 2016)

The nation's 5 million-plus English-language learners could receive significant civil rights protections under the Every Student Succeeds Act, but the new law is also fraught with potential pitfalls, some ELL advocates say.

The bill will shift accountability for English-learners from Title III—the section of the federal law that previously authorized aid to states and local school districts for English-language-acquisition programs—to Title I, the federal program under which the performance of all other student groups is scrutinized.

That move is an indication that the law will do more to hold all schools, not just those with significant ELL enrollments, accountable for the education of non-native English-speaking students, some advocates said.

"It sends a signal that [ELLs] cannot be ignored," said Brenda Calderon, an education policy analyst with the National Council of La Raza.

But La Raza and other groups have reservations about a number of provisions in the law, including the decision to scrub federal accountability targets for ELLs, granting more power to states in the process.

Under the new law, states will develop their own ELL accountability systems that must measure progress in English-language development and the number of students who become English proficient. Many states may not have the wherewithal or staff to carry out the duties, said Gabriela Uro, the director of English-language-learner policy and research at the **Council of the Great City Schools**.

Often considered a homogenous group, in part because at least 80 percent are Spanish-speaking, ELLs can arrive in U.S. schools with vastly different education experiences and circumstances. A refugee student with little or no formal education has different needs than a U.S.-born student with some exposure to English.

"How will the states make sure they are coming up with criteria that are reasonable and fair to these various groups?" Uro asked.

The law also allows states and districts to include former English-learners in the ELL subgroup accountability for up to four years, a move that could allow districts to "mask the performance" of current ELLs, said Delia Pompa, a senior fellow for education policy at the Migration Policy Institute's Center on Immigrant Integration Policy.

Testing Changes Ahead

Fearing the worst, advocates and civil rights organizations have already urged states to diligently monitor the progress of current ELLs and immediately address any downward trends in performance.

The new federal law also requires districts and states to report additional data on ELLs with disabilities and long-term English-learners, those students who don't reach a sufficient level of English proficiency to be reclassified as fluent within a set period of time.

Most research indicates that it takes students at least four years to become fluent in academic English, the language that allows students to retell a story or understand mathematical word problems. The longer students are identified as ELLs, the less likely they are to graduate.

The law also requires states to establish consistent standards for determining when students require English-learner services and determining if students are ready to exit special programs. Researchers and advocates have expressed concern about the patchwork of entry and exit criteria for ELLs.

Despite the change, some districts will still place a higher priority on ELLs and their education than others do, Uro said.

"This is not going to normalize the services students get," she said. "What matters more for ELLs is what happens during instruction."

The Council of Chief State School Officers released recommendations last fall advising states and districts on how to reclassify ELLs. The council has also offered guidance on how to identify ELLs.

ESSA also allows states to exclude math and English/language arts test results for newly arrived English-learner students as part of their performance ratings.

Students would need to take both exams in their first year of school, but states wouldn't be held accountable for their performance.

In year two, the state would have to incorporate ELLs' results for both reading and math, and measure their growth. By the third year, the proficiency scores of newly arrived ELLs are treated just like any other students'.

Education Week

Need for Bilingual Educators Moves School Recruitment Abroad

By [Corey Mitchell](#)

The nationwide shortage of bilingual K-12 teachers has school systems looking beyond the United States to fill the growing demand for qualified instructors.

Districts have [struggled for decades](#) to find bilingual teachers, especially in communities where English is not the first language for many students.

Now, recent upticks in the percentage of English-language-learner students and demand for dual-language programs for their English-speaking peers have more districts tapping an already shallow talent pool.

Bilingual teachers are in especially short supply in places like Texas, where nearly 40 percent of the residents are Hispanic or Latino.

A number of school systems, including big-city districts such as Houston and Dallas, are turning to Puerto Rico and Spain to find bilingual teachers.

Increasingly, smaller Texas districts and systems from other parts of the country are taking the same approach, traveling overseas and off the U.S. mainland to fill vacancies or newly created positions.

"Schools are so hard-pressed to find [teachers] fluent in another language," said Gabriela Uro, the director of English-language-learner policy and research at the [Council of the Great City Schools](#), a Washington-based organization of big-city school systems. "It's a huge challenge."

A 2013 survey by the council found that roughly half of its 67 member districts had a shortage of bilingual and ELL teachers or anticipated struggling to fill positions in the near future.

The National Association for Bilingual Education, or NABE, has advocated for a federal response to the problem.

"There's been a lack of attention to this critical need," said Santiago Wood, the executive director of NABE. "Every large urban district is in the same place we were 10 years ago."

TESOL International Association, the organization for teachers who specialize in working with English-learners, expressed disappointment that the Every Student Succeeds Act, the new law that reauthorizes the Elementary and Secondary Education Act, does not include specific

proposals to increase the number of English-as-a-second-language and bilingual specialists in schools.

Things haven't changed much in the two years since the Council of the Great City Schools survey. But now, more districts are recruiting internationally, Uro said.

With districts competing for a handful of capable candidates, hiring fairs can evolve into bidding wars, veteran recruiters say. Job candidates in some districts are wooed with annual stipends of \$4,000 or more and similarly generous signing bonuses.

Houston's school board this past fall boosted the annual bilingual-teacher stipend by \$2,500, increasing it to \$4,000, to compete with neighboring suburban districts that were offering three times as much.

"We have to be competitive, ... make it appealing for people who want to come here," said Janie Ruiz, a Houston senior recruitment manager.

Hiring bilingual teachers is more necessity than luxury. There are more than 52.6 million native and bilingual Spanish speakers in the United States, making the country second only to Mexico in that category, [according to a June 2015 report](#) by Instituto Cervantes, a nonprofit created by the Spanish government.

In Texas, as in much of the United States, school districts with 20 or more English-language learners in a single grade must offer bilingual education with a certified teacher.

Spanish Surge

In Houston, the state's largest district, roughly one-third of the 200,000-plus students are native Spanish speakers. The district's plan to open more dual-language schools, most of them Spanish-oriented, has also driven the demand for bilingual teachers.

Dallas, the state's second-largest district, hires about 2,000 teachers per year on average. Among that group are between 400 and 500 bilingual instructors who earn a \$3,000 annual stipend on top of their salary.

Forty-three percent of students in Dallas are English-learners. The fast-growing student population made up about 30 percent of enrollment a decade ago.

"Our [demographics] are changing, and the supply of teachers in Texas does not meet our demand," said Meredyth Hudson, a Dallas schools human-resources executive director. "Teacher demand will keep increasing. We just have to figure out how to meet it."

The most popular offshore-recruiting destinations for U.S. school districts are Spanish-speaking countries; the language is the most common home or first tongue of the nation's English-language-learner students.

A 2015 analysis by the Migration Policy Institute shows that roughly 70 percent of student ELLs are Spanish-speakers. Nationwide, no other language accounts for more than 5 percent of school-age language-learners.

Puerto Rico, where the teachers are already U.S. citizens, and Spain, whose Education Ministry has established partnerships with states and districts, have emerged as the most fertile recruiting grounds.

Heading to Puerto Rico to hire teachers is much like recruiting staff in a neighboring state, said Jordan Carlton, a Dallas schools recruiting specialist.

The teachers already understand U.S. culture and can often have their salaries doubled or tripled by taking jobs in the United States, said NABE's Wood.

Recruiters for both Dallas and Houston take multiple trips to Puerto Rico each year.

Dallas employs about 300 teachers from Puerto Rico, a number that's doubled over the past three years because of robust recruitment on the island. The district has roughly 150 teachers from Spain working in schools. The number of hires has remained relatively steady each year because of visa limitations.

Houston has hired about 50 teachers from Spain and 10 from Puerto Rico in each of the past two years, but would like to see those numbers increase. The district does not track the total number of teachers from those countries, Ruiz said.

As a superintendent in California in the 1990s, Wood recruited teachers from Spain, Mexico, Central America, and Asia.

Recruiting internationally gives districts another option for hiring bilingual teachers and helps them get seasoned instructors, Wood said.

Spain's Education Ministry operates more than 20 regional offices in the United States, with two in Texas. To participate in Spain's placement program, teachers must have at least three years of experience, and they must commit to working three years in the United States. Teachers' travel costs, and sometimes the recruiting trips for districts, are covered by the Spanish government.

Tough Adjustment

The transition, however, is often not as smooth for teachers who make the move from Spain.

Adjusting to a new country and education system has led some homesick teachers to return to Spain after several weeks or midyear, school officials say, leaving recruiters to once again hire for jobs that proved difficult to fill the first time around.

Another challenge is the possible cultural disconnect between Spanish speakers from Spain and U.S. English-learners, most of whom hail from Mexico, the Caribbean, or Central America.

"You're not going to have a Mexican kid speaking like a Spaniard," said Uro of the Council of Great City Schools.

"But the cultural relevance and fit goes both ways. Some of the teachers get here and have trouble adjusting. What do you do then?"

Uro has witnessed the adjustment firsthand, having hosted a bilingual teacher from Spain in her home.

"It can be tough," she said.

To ease the transition for the new international and Puerto Rican teachers, Houston and Dallas staff help their new hires find housing and transportation and help them connect with each other.

"Our goal is to set them up for success so they want to stay," said Ruiz of the Houston schools.

"There are some who do go back. But if they're doing well, ultimately, our kids will do well."

Education Week

Published in Print: January 6, 2016,

Standards for Principal Supervisors Bring Sharper Focus to Role

Districts make efforts to redefine job

By Denisa R. Superville

School district leaders and other K-12 educators hope that new professional standards for the administrators who oversee principals will help guide them as they start to pay more attention to a group of middle-managers who've often been overlooked.

The eight standards, **released in December**, are the first-ever national guidelines to detail what knowledge and skills supervisors of principals should have and the things they need to do to be successful in the job.

In particular, the standards emphasize the supervisors' role in helping the principals they oversee improve as instructional leaders; in serving as a liaison between schools and the central office; and the supervisor's own responsibility to grow as a leader.

Principal supervisors are charged with evaluating and coaching principals and advocating on their behalf to the central office. But traditionally, the job has focused more on compliance with rules and less on the ways the administrators can support the principals they manage.

Districts have not made the principal supervisor's role a priority, but that has been changing in recent years amid a growing body of research on the impact that strong principals can have on students' learning.

That shift also follows a 2013 report by the **Council of the Great City Schools** that showed that the responsibilities of the job and the number of principals that supervisors oversee vary from district to district.

Chris Minnich, the executive director of the Council of Chief State School Officers, which oversaw the development of the new standards, said that they "will bring much-needed clarity" to the position.

The standards will "enable states and districts to elevate the role of supervisors so they can focus on helping principals improve instruction, learning, and ultimately, student achievement," Minnich said in a statement last month.

Supporting School Leaders

The standards are voluntary, but they can help officials make decisions about how best to deploy people in the position, recruit talent, and plan professional development for those in a role that is still relatively new, according to the CCSSO.

The first standard addresses the supervisor's role in helping principals become better instructional leaders; the second with assisting principals with coaching and professional development; and the third with using evidence to foster a positive learning environment.

The fourth standard addresses how supervisors should use the evaluation process to help principals improve. The fifth and sixth standards deal with the supervisor's role as a liaison between schools and the central office to ensure, among other things, that schools have adequate resources to be culturally responsive to their students.

The seventh and eighth standards address the supervisor's responsibility to lead change.

Pamela Cohn, a principal-supervisor in Omaha, Neb., said the standards align with the approach she and her colleagues use on the job.

"We are doing all of these things," Cohn said of the new standards.

"It's like they talked to us—but they didn't. That's not to say that we can't do better, and that we can't do some things at a higher level of implementation. "Cohn is one of four executive directors hired last school year in the Omaha district to work with principals. Cohn and her fellow supervisors spend at least half their time in schools observing, coaching, and arranging professional learning for principals.

Omaha's principal-supervisors also receive monthly training.

The district is now revamping its principal-evaluation system and expanding professional learning communities for its principals, Cohn said.

The supervisors will also spend more time working with principals in lower-performing schools and differentiate the support they provide based on the needs of individual principals and schools, said Cohn, who is in charge of 26 principals.

Omaha is among a small but growing number of districts paying more attention to supervisors.

In 2014, the Wallace Foundation **launched a \$30 million initiative** to help 14 urban districts zero in on the role, including working on reducing the number of principals that supervisors oversee.

The foundation also helped pay for the development of the principal-supervisor standards. (The Wallace Foundation supports coverage of leadership, arts education, and extended- and expanded-learning time in *Education Week*.)

Rising Visibility

Last summer, supervisors from seven districts, including Albuquerque, N.M., and Cleveland, participated in a three-day training by the New York City Leadership Academy as part of a yearlong principal-supervisor training program.

And the first-ever principal-supervisor summit will be held in Florida in May.

Brenda Turnbull, a principal at Policy Studies Associates, a Washington-based firm that is evaluating the Wallace Foundation's Principal Pipeline Initiative, said evaluators are seeing a shift in the districts' expectations of their supervisors. Through surveys, principals are reporting that they are altering practices based on the feedback they receive from their supervisors, she said.

The focus on principal evaluation as a form of support is also a big help for principals, she said.

While empirical data on how focusing on supervisors affects student learning are still lacking, principals are reporting that they think their evaluations are more valuable and

fairer because supervisors are more knowledgeable about the schools they are grading, said Jody Spiro, the director of education leadership at the Wallace Foundation.

A Linchpin Job

Spiro said the standards communicate the importance of a role that is not well understood and will help sustain the progress in districts already forging ahead.

On-the-ground experiences show that districts can see "dramatic effects" when the principal-supervisor position is redesigned to focus on teaching and learning—in the way that the standards envision, she said.

"We've been calling the principal-supervisor role a linchpin role because it is the connection between the schools and the central office," Spiro said.

"If you get that position right—in terms of its ability to help principals with teaching and learning as opposed to monitoring and compliance with regulations, it's beginning to become clear that it has quite a big effect, because the schools can't do business as usual and the central office can't do business as usual."

Washington Post

D.C. Schools Chancellor Kaya Henderson celebrates 5 years at helm

By [Michael Alison Chandler](#) November 12, 2015

When former D.C. schools chancellor Michelle A. Rhee resigned after the defeat of then-Mayor Adrian M. Fenty, her then-deputy, Kaya Henderson, had planned to follow her out the door.

But Rhee asked Henderson to stick with the city schools and continue the education reforms they began together. Vincent C. Gray, the newly elected Democratic mayor, asked her to stay, and she started getting calls from teachers and principals she had recruited.

“I tried to say ‘no’ a thousand different ways,” Henderson said in an interview this week, five years after she relented and took the reins of the city’s public schools. “Five years later, I am still having a good time and I am proud of what we have accomplished.”

The chancellor’s anniversary comes this month as the school system is celebrating signs of progress, including significant test-score gains, five consecutive years of enrollment increases after decades of declines and an uptick in graduation rates, to 64 percent.

Unlike her predecessor, whose turbulent style and top-down approach made enemies of many teachers and politicians, Henderson is credited with taking a more collaborative approach. She also is praised for bringing a sustained focus to the work of digging the school system out of a deep hole and building what

she described at an event this week at the National Press Club as a “halfway decent district.”

Challenges remain vast, particularly in many of the lowest-performing schools, where academic growth has been incremental or stagnant and where the city’s most challenging students remain far behind their peers. But she hopes to build on momentum that has encouraged many people inside and outside the District.

“I think she has emerged as one of the most effective and popular school leaders any place in the country,” said Michael Casserly, executive director of the **Council of the Great City Schools**. “She is improving the D.C. Public Schools in ways that everybody is trying to do with their own cities.”

Henderson and the schools have benefited from the city’s expanding economic base, a growing population of school-age children and some of the highest per-pupil funding in the country. With mayoral control, the chancellor has wide latitude to experiment and make major changes, and her approach appears to be meeting with some success.

Two weeks ago, the school system posted significant gains on the National Assessment of Educational Progress, a closely watched measure of student achievement. Scores for fourth-graders in the school system climbed four points on the national math test between 2013 and 2015 and eight points on the reading test — the largest jump of any urban district. In 2007, D.C. schools’ fourth-grade scores ranked at the bottom of large urban districts participating in the test; this year, they are in the middle. Eighth-grade scores are still near the bottom.

U.S. Education Secretary Arne Duncan pointed to the city’s success, saying after the data was released that the educators, students and leaders of D.C. schools “deserve the gratitude of this country” for their hard work. Broader

improvements in the school system also have won praise from President Obama.

Despite the accolades, many educators and advocates are concerned that progress in the school system is still not being felt by many of city's most disadvantaged students. In many schools in the poorest parts of the city, less than a third of students perform on grade level, standardized tests show.

A [National Research Council report](#) released in June found that more than seven years after a series of reforms took root — when Fenty took control of the city's schools and appointed Rhee as chancellor — the District's poor and minority students are still far less likely than their peers to have a quality teacher in their classrooms, perform at grade level and graduate from high school in four years.

Although performance on standardized tests has improved for all groups, the city's academic achievement gap remains stark. The report urged the city to make addressing disparities its primary objective.

The recent success on NAEP overshadowed sobering results released a day earlier from new standardized tests tied to the Common Core State Standards. None of the test takers at seven of the city's comprehensive high schools scored well enough to be considered “college ready” on a geometry test.

This year, the chancellor funneled millions of additional dollars into the city's neighborhood high schools to add more elective and college-level courses, an effort to enhance scant offerings and boost low enrollments.

Cathy Reilly, executive director of the Senior High Alliance of Parents, Principals and Educators, said the investments are welcome but she is concerned that some decisions during the past seven years, including closing middle schools that feed into high schools and focusing on magnet schools, have made it more difficult for comprehensive high schools to compete for

students in a system where 44 percent of public school students opt to leave the system for charter schools. “There is still a lot of work to do,” she said.

Henderson said she plans to redouble efforts this year in all of the District’s lowest-performing schools by extending learning time, refining professional development and supporting families in new ways.

Many attribute a large measure of the system’s progress to Henderson’s longevity. Urban school superintendents, on average, leave after about three years, according to a survey by the Council of the Great City Schools — a reflection of bruising city politics and intense pressure for instant success.

In the decade before Rhee was appointed chancellor, the District’s schools were led by six superintendents, bringing a succession of strategic plans and funding formulas.

“The government often thinks the path to improvement is to fire people, without recognizing that firing people often means starting over,” said D.C. Council Chairman Phil Mendelson (D). “Historically, that has just perpetuated enormous instability in the school system.”

Henderson, building on Rhee’s work, has been able to carry out a more methodical and consistent approach, with new academic standards and related instructional materials, professional development, coaching and programs.

“She brings some continuity,” Mendelson said. “She has a vision, and she is pursuing it.”

Although the system as a whole is benefiting from more stability, many educators and parents say that instability remains a problem at the school level.

One in four D.C. schools started the school year with a new principal. Some retired or were promoted, and others were fired. Evaluations for teachers and principals can yield generous raises for high performers and trigger termination for low performers.

Walter Pennington, a father of twins in pre-kindergarten at Payne Elementary on Capitol Hill, helped wage a campaign to have its principal, Vielka Scott-Marcus, reappointed after learning last spring she would be leaving.

He said Scott-Marcus was making improvements at Payne, increasing enrollment and making it feel like a neighborhood school — no small task in a community with million-dollar homes and a family homeless shelter.

This year, they are starting over with an interim principal. “It feels like a throwaway year,” Pennington said.

Henderson said that the school system is “redefining what quality means in the educator workforce,” a process that is bound to lead to churn.

She said the school system is training principals who get up to speed quickly in new schools. And she noted that there is a 92 percent retention rate among teachers who are rated highly effective.

Turnover has been a flash point with the Washington Teachers’ Union, which is concerned that the evaluations are not fair and overly punitive. [Half of the teachers in affluent Ward 3](#) were considered highly effective in 2013-2014, while just under 20 percent of teachers working in high-poverty schools in Wards 7 and 8 received the highest rating.

Randi Weingarten, president of the American Federation of Teachers, helped negotiate final terms of the teachers contract in 2010 with D.C. schools and said she found Henderson to be calm and collegial. Since then, she has been disappointed to see there is not more collaboration with the union in addressing such concerns.

There continues to be an “us versus them” mentality, Weingarten said.

Despite the politics and the challenges in the work, Henderson frequently tells people that she has the best job in the city.

She plans to stay in her role until at least 2017, when she intends to check her progress against a set of goals she has set for the schools.

“I have to ask, ‘Am I the right person to continue to lead this organization?’” she said. She does not know what the answer will be, but she said the deadline helps to motivate her.

“If I am going to leave in 2017, that’s right around the corner,” she said. “I have a lot of stuff to get done.”

The New York Times

Oakland District at Heart of Drive to Transform Urban Schools

By [MOTOKO RICH](#) MARCH 4, 2016

OAKLAND, Calif. — The 70 teachers who showed up to a school board meeting here recently in matching green and black T-shirts paraded in a circle, chanting, “Charter schools are not public schools!” and accusing the superintendent of doing the bidding of “a corporate oligarchy.”

The superintendent, Antwan Wilson, who is an imposing 6-foot-4, favors crisp suits and Kangol caps and peers intensely through wire-rimmed glasses, has become accustomed to confrontation since he arrived in this activist community from Denver two years ago. One board meeting last fall reached such a fever pitch that police officers moved in to control the crowd.

Mr. Wilson is facing a rebellion by teachers and some parents against his plan to allow families to use a single form to apply to any of the city’s 86 district-run schools or 44 charter campuses, all of which are competing for a shrinking number of students.

How he fares may say a great deal not only about Oakland, but also about this moment in the drive to transform urban school districts. Many of them have become rivalrous amalgams of traditional public schools and charters, which are publicly funded but privately operated and have been promoted by education philanthropists.

Mr. Wilson is trying to bring the traditional schools into closer coordination with the charters. “If he gets it right, it’s a model for moving past the polarized sense of reform that we have right now,” said Robert C. Pianta, dean of the Curry School of Education at the University of Virginia.

But Mr. Wilson has emerged as a lightning rod partly because he is one of a cadre of superintendents who have been trained in an academy financed by the Eli and Edythe Broad Foundation. Like Bill Gates and Mark Zuckerberg, Mr. Broad, a Los Angeles billionaire who made his fortune in real estate and insurance, is one of a group of businessmen with grand ambitions to remake public education.

His foundation has pumped \$144 million into [charter schools](#) across the country, is embroiled in a battle to expand the number of charters in his home city, and has issued [a handbook](#) on how to close troubled public schools.

Unique among the education philanthropists, his foundation has also contributed more than \$60 million over 15 years to a nonprofit that trains superintendents and administrators, convinced that they are key to transforming urban school systems.

When Mr. Broad first announced the initiative in 2001, he noted that the average urban schools leader lasted just over two years and had little preparation in finances or management.

The new [academy, he said](#), would [“dramatically change this equation”](#) by seeking candidates in educational circles as well as recruiting from corporate backgrounds and the military, introducing management concepts borrowed from business. Those chosen embark on a two-year fellowship, trained and mentored while working in their districts.

The fellows meet with speakers from think tanks, other school districts, charter networks and the business world. During one session last fall in New York, [administrators from large districts shared a conference room with charter leaders](#) and discussed challenges they have in common: how to recruit racial minorities to teaching, how to staff executive teams, and how to change punitive disciplinary culture

Regardless of training, any leader of a large school district faces daunting challenges. Superintendents “deal with a very unusual stew of people who are often divided by race and language and income and religion,” said Michael Casserly, executive director of the [Council of Great City Schools](#), a coalition of urban districts where the average chief now lasts just over three years. Those diverse groups, he said, are “all fighting over the one thing that they care most passionately about: their children.”

Broad-trained superintendents currently run districts in two dozen communities, including Boston, Broward County, Fla., and Philadelphia. They have lasted an average of four and three-quarter years, delivering incremental academic progress at best.

Like others in the field, they have run up against the complexities of trying to improve schools bedeviled by poverty, racial disparities, unequal funding and contentious local politics.

Some prominent academy alumni have resigned after tumultuous terms. Mike Miles, the Dallas schools superintendent, quit last June after just three years, during which he battled teachers over new evaluation criteria and performance-based pay.

In Los Angeles, [John Deasy stepped down as superintendent](#) in the fall of 2014 after a turbulent tenure in which he testified against teachers’ unions during a landmark trial involving tenure and job protections, and presided over a botched rollout of a \$1.3 billion plan to give all students iPads.

That same year, John Covington abruptly resigned as chancellor of a state-operated district for the lowest performing schools in Detroit. Two years earlier, Jean-Claude Brizard resigned from the Chicago Public Schools after 17 months on the job and a bruising teachers’ strike.

Still, Mr. Broad said his money is well spent. “When I look at how many students are educated in public school systems where our alumni are and have worked,” he wrote in an email, “there is no question that this has been a worthwhile investment.”

Oakland is the kind of place where philanthropists hope to make a difference.

Here, across the Bay Bridge from San Francisco, close to three-quarters of the 37,000 students in district-run schools come from low-income families'. About 30 percent of the students are African-Americans, and more than 40 percent are Latino.

A little over a decade ago, the district was in financial chaos. [The state put the district into receivership](#) and extended a \$100 million loan just to cover payroll.

In 2003, the state appointed the first of a string of Broad-trained administrators to run the district, free of local school board authority. Randolph Ward, who was then a state administrator of a troubled district in Compton, near Los Angeles, arrived as Oakland was embarking on an initiative to open a series of small schools. During his time here, Mr. Ward opened two dozen small schools but also closed 14 schools. New charter schools were also opening, cutting into enrollment at district schools.

Mr. Ward was succeeded briefly by two other Broad alumni, Kimberly Statham and Vincent Matthews. All three declined to comment for this story. Meanwhile, the district is still paying back its debt.

The Broad-trained superintendents — along with other non-Broad state-appointed administrators — had modest success in raising student achievement. Between 2004 and 2010, scores on standardized reading and math tests grew more than in any other California district with population similar in size.

Still, less than a quarter of students met standards on tests last spring, below state averages. At the charter schools, by contrast, about a third met math standards and close to 40 percent met reading standards — although the charters educate fewer students with disabilities, an element that can depress test score averages.

Mr. Wilson arrived as the first Broad-trained superintendent to be hired by a re-empowered and elected school board. It voted for him unanimously, attracted by his record in Denver. There, he had been an assistant superintendent and worked with several struggling schools.

During Mr. Wilson's tenure, Denver — also led by a Broad-trained superintendent — combined charters and more traditional schools in one enrollment system, as Mr. Wilson now proposes in Oakland.

Mr. Wilson, who is African-American, describes growing up poor and being raised by a single mother and said he entered education because of a commitment to social justice. He said he had a "visceral reaction" when he heard arguments about children in poverty "and how we need to fix that first before we can educate them. I am thinking that it's actually educating them that gives them a chance to fix some poverty."

By the time he arrived in Oakland, residents were frustrated by a history of financial mismanagement and persistently low test scores and graduation rates. Many educators in district schools felt like they were fighting for their professional lives as charters took more and more students — and public funding — away.

Today, charters account for about a quarter of public school enrollment in the city, while the combined population of students in Oakland's district and charter schools has declined by about 13 percent since 2000.

While the teachers' union and some parent groups worry that district-run public schools will ultimately be eviscerated by competition from charters, other parents are voting with their feet, sending their children to the newer schools.

Kenetta Jackson, a housing administrator and a mother of two, decided the local school in her East Oakland neighborhood was "not up to my personal standards." Her daughter, now 16, and son, 13, have attended charter schools in the Aspire Public Schools network since they were in kindergarten.

Ms. Jackson said she did not understand the debates about the merits of charter schools. "It's a lot of politics beyond my reach," she said. "I'm more concerned about my children's education. I personally think that Aspire came and saved Oakland public schools because if they didn't come, I would be paying an arm and a leg for my kids to go to some private school somewhere, and who can afford that?"

For his part, Mr. Wilson says he is neither for nor against charters. "I want effective schools," he said in an interview in his offices in downtown Oakland.

Since he arrived, Mr. Wilson has focused on sending more tax dollars away from the central office and directly to schools, and he negotiated a contract giving teachers a 14 percent raise, their largest in 15 years, although Oakland teachers are still paid less on average than educators in surrounding counties. Mr. Wilson is also overhauling five of the city's most troubled campuses, moving principals and introducing new academic and enrichment programs.

He is working with both district schools and charter leaders to negotiate an agreement to meet the same standards for academics, discipline and enrollment criteria.

Although he retains a solid bloc of support on the board, some members question whether he is pushing too hard and overriding community input. "You can't change overnight," said Roseann Torres, a board member. "Does he understand that? I hope so. I know he feels a deep sense of urgency."

Teachers, parents and other activists regularly turn out at board meetings to attack him. Take the furor over a plan he introduced last fall to help more students with disabilities enter mainstream classrooms.

At a meeting in October, teachers, students and parents lined up before a microphone, warning that the proposals did not provide enough funds for teachers' aides and would lead to oversize classes, prompting an exodus of more students from district schools into charters.

At one point, the anger at Mr. Wilson boiled over and police officers helped quell the unrest. Yvette Felarca, a local activist, denounced Mr. Wilson, saying he was undermining special education “to make the charter schools more competitive with a degraded public school system.”

“When Eli Broad trained Antwan Wilson,” she shouted, “he trained him to come in here and privatize the schools!”

A few weeks ago, at another board meeting, teachers protested the proposal to unify district schools and charters under one enrollment process.

Mr. Wilson says that a single application form, where parents rank their choices among all schools and students are assigned through a computer algorithm, will reduce the ability of well-connected parents to place their children in the most desirable schools and force charters to be more open about how they admit students. Similar systems have been put in place in Washington and New Orleans and are being considered in Boston.

Opponents fear the proposal would simply hasten an exit of more students from district schools to charters. On a recent Sunday afternoon, Kim Davis, co-founder of a new parent group, explained her concerns to 19 people crowded into the living room of a fellow parent. If district schools are diminished, “teachers will be laid off, students displaced, and schools will close,” Ms. Davis warned, “which just adds to the downward spiral of the district as a whole.”

The school board is to vote on the common enrollment plan in June, while the special education plan is already going ahead.

Mr. Wilson said he sympathized with some of the anger directed at him. “It’s ‘you’re the superintendent of Oakland schools and a power structure that has not served us well, in many cases, for decades,’” he said.

But he scoffed at allegations that he is a puppet of the Broad Foundation. “People can connect all kinds of dots,” he said, adding that “no Broad agenda has ever been shared with me.”

The foundation has given to the school district in other ways: it has granted about \$6 million for staff development and other programs over the last decade. The Broad Center, which runs the superintendents’ academy, has subsidized the salaries of at least 10 ex-business managers who moved into administrative jobs at the district office.

But it is the leadership turnover that has left teachers wary. “It’s just a different face at the top,” said Leona Kwon, who teaches ethnic studies at Castlemont High School. “I have not personally experienced a significant increase of support or resources at our school, so I’m skeptical that that’s ever going to happen.”

Some educators give their schools chief high marks for his attention to detail. At Frick Middle, one of five previously struggling schools that the district is trying to overhaul, Ruby Detie, the administrator appointed to lead the changes, recalled that after she told Mr. Wilson that a mouse had run over the foot of a teacher interviewing for a job, an exterminator appeared the next day.

After observing several classrooms at Acorn Woodland Elementary recently, Mr. Wilson pulled aside the principal, Leroy Gaines, to praise two fourth-grade teachers for how often they invited students to hash out problems aloud. But in bilingual kindergarten and first-grade classes, Mr. Wilson told the principal he was concerned that the teachers were speaking too much during lessons.

“I was struggling to really see the degree to which the students were really doing the thinking,” Mr. Wilson said.

At other schools, some teachers point to missteps. At Fremont High, another school being revamped, some teachers complain that Mr. Wilson replaced a bilingual principal with a leader who does not speak Spanish, though close to 60 percent of the students are Hispanic. The school redevelopment “feels almost like a takeover,” said Jasmene Miranda, a graduate of the high school who is now a media teacher there.

Mr. Wilson said that he has appointed “the best possible leaders.”

He said he understood some of the community criticism. “I think that is just, ‘Hey we’re really concerned this guy might really want to sell the farm,’ ” he said.

“Well, I don’t,” he added. “I do want to improve it, though.”

El Paso Times

Superintendents groups gather in El Paso

[After the Bell](#)

Lindsey Anderson, El Paso Times 3:36 p.m. MST January 21, 2016

70 Shares    

Superintendents from metropolitan school districts across the country and new Texas Education Commissioner Mike Morath are gathering in El Paso for multiple events this week.

The Texas [Urban Council of Superintendents](#) held its executive meeting Thursday in El Paso. On Friday and Saturday, the national [Council of the Great City Schools](#) will have its executive board meeting in town.

El Paso Independent School District Superintendent Juan Cabrera is president of the Texas Urban Council of Superintendents and serves on the Council of Great City Schools executive committee.

Many visiting superintendents will participate in a symposium on public urban education Friday at the University of Texas at El Paso. The Texas Tribune is hosting the [event](#), which is free and open to the public. The first panel at 8 a.m. will focus on "educating the new demographic minority."

Panelists are Cabrera, superintendents from Dallas and San Francisco school districts and UTEP professor Elena Izquierdo.

The second panel explores social and emotional learning, featuring education officials from Austin, Houston, Kansas City and Cleveland.

The final panel will examine the "high school-to-college pipeline." Panelists are El Paso Community College President William Serrata; David Anthony, CEO of Raise Your Hand Texas; and superintendents from Texas' Grand Prairie and Pharr-San Juan-Alamo school districts.

The event will close with a conversation with Morath, who took over the Texas Education Agency on Jan. 4.

Minneapolis Star Tribune

Goar withdraws from candidacy for permanent Minneapolis schools chief

By [Liz Sawyer](#) and [Alejandra Matos](#) Star Tribune
January 24, 2016 — 12:10am

Renee Jones Schneider, Star Tribune Interim Superintendent Michael Goar's withdrawal is the latest tumultuous development in a superintendent search that has pitched the Minneapolis district into crisis.

Text size

Michael Goar, Minneapolis' interim schools chief, on Saturday withdrew his bid for the permanent job, saying that he has become a distraction in the tumultuous process.

Goar's decision brings new uncertainty to a protracted superintendent search that has gone on for nearly a year and pitched the district into crisis.

“Over the last few weeks, I have watched as our community and school board leaders have become increasingly fragmented and divided,” Goar wrote in a letter to the board and parents. “I never expected that we would agree on everything, but we must all be unified on why we are here and we must remain focused on children and not on the disagreements and disrespect that continue to divide and distract us.”

To ensure that focus, Goar said, he is stepping away from the process. He will remain interim superintendent until the board makes its new choice.

Goar had been the presumed front-runner since the board voted unanimously two weeks ago against the man who for a time was its preferred candidate, Sergio Paez. Board members said they did not believe the community could rally around Paez after allegations surfaced that staff members at a school in his former district in Massachusetts physically abused students.

But as the board was about to vote Jan. 12 on giving the job to Goar, protesters brought the meeting to a halt, demanding that the board restart its search.

In the midst of a motion this month to select interim Superintendent Michael Goar as the board's preferred candidate, protesters interrupted the meeting, saying the board should start over.

As recently as Wednesday, Goar spent time talking to members of the media about his desire to take the job permanently, even though he wasn't the board's first choice and still faced opposition from some community members.

Supporters had argued that Goar would bring stability and ensure that a property tax referendum in November is approved by voters.

Others said appointing him would not bring the unity and community support that the board believes is key to improving student achievement. Restarting the superintendent search would be the only action that can ensure that board meetings are not disrupted by protesters, they said.

“Now is perhaps not the right time for Michael Goar,” Goar said in a phone interview Saturday. Although he still believes he is the right person for the job, he said he withdrew to enable the board to find someone who can bring the community together.

Next steps

The board had planned to discuss its next steps at a public meeting Tuesday. That meeting will continue as planned but now focus on new options, including restarting the search, board chairwoman Jenny Arneson said Saturday.

“I respect his decision,” she said. “I imagine this was difficult ... and he feels this is in the best interest of the district, the community and our children.

“Personally, what I’ve learned is that having an interim superintendent as a candidate for the permanent position poses some challenges,” she said. “There is a natural tendency to focus on the individuals and not the position, not the needs of the kids. It creates a little more of a political environment.”

Board member Don Samuels, who had supported Goar for the job, said he was shocked and disappointed by his decision.

“We’re always going to have opposition,” he said. “I have a feeling that’s just the way it’s going to be in this district. In the end, we’ll have to make a decision that’s best for our children and not be so preoccupied with our own emotions, reputations and images.”

Arneson said there are some things the board can do differently. For one, it plans to abandon its previous search firm, Hazard, Young and Attea, hired last year in a \$85,000 contract.

Board and community members have voiced concerns that the search firm didn’t uncover the abuse investigation in Holyoke, Mass., that affected Paez’s candidacy. Arneson said the district will pursue a refund from HYA to help pay for a new search.

The board did not plan to have a new superintendent in place before the summer, so Arneson said she is confident it can still meet that deadline.

Year of turmoil

Since its search began, the board has said it wants to appoint a leader who can stay and be successful in Minneapolis for many years.

That would be unusual. The average tenure for urban school superintendents is about three years, according to the **Council of the Great City Schools**. Minneapolis has had three superintendents in the past decade.

Goar began serving as interim superintendent Feb. 1, 2015, following the resignation of Superintendent Bernadeia Johnson. Since then, he has been criticized for making major decisions, like reconfiguring middle-school sports or changing special education programs, without engaging a broad group of parents, teachers and community members. Graduation rates and student achievement on state tests also have not reached the levels called for in the district's academic plan.

In his letter, Goar highlighted his successes, including negotiating a new teachers contract, launching Community Partnership Schools and downsizing the staff at the district's central office.

The Minneapolis chapter of the NAACP sent a letter to the board last week citing concerns about Goar's leadership. The group said "he has failed to adequately engage the black community" and "there has not been substantive academic growth for students of color."

The organization asked the board to conduct a new local search or to re-evaluate previous applicants for the job, as well as evaluate Goar's performance and make the findings public. The majority of board members voted those ideas down.

Nekima Levy-Pounds, the Minneapolis NAACP president, said Saturday that she supports Goar's decision to withdraw, but still believes it's necessary to carry out an evaluation of his work. Identifying new local talent should be the next priority, she said.

"There's some fundamental challenges that need to be addressed," she said. "We need leadership that will energize the district, take things in a new direction and work vigorously to close the gaps that exist."

Some community leaders, like former school board members Pam Costain and Alberto Monseratte, former superintendent Johnson and former Minneapolis mayor R.T. Rybak, have said that the more vocal Goar opponents may not reflect broader community sentiment.

On Saturday, Rybak called Goar's withdrawal a "huge setback" that could make November's referendum even more challenging.

"It's going to be increasingly difficult to attract someone to this job without the board sending a clear message that it's ready to make decisions and work together," he said. "Until then, it will be very difficult for anyone to succeed."

Rybak described Goar's efforts to keep the schools running as "near-heroic" and argued that the city should be grateful for what he's accomplished in light of mixed messages from the board.

“This should continue to sound an alarm bell that’s been ringing for several months,” he said. “A board that is not making decisions and acting in disarray is not going to be able to lead.”

Goar said Saturday that for the next six months, his priority will be tackling the budget and expanding experiential learning, such as oral language programs.

After that, he may try to serve the community in a different capacity, he said.

“I’m deeply committed to this community. This is my home,” he said. “I’m a product of Minneapolis Public Schools and I have deep roots here.”

Minneapolis Star Tribune

After year in crisis, Minneapolis school board promises change

Minneapolis school board members say they want to do less micromanaging.

By [Alejandra Matos](#) Star Tribune

January 17, 2016 — 2:00pm

Days before their vote on a new superintendent, the nine Minneapolis school board members took a pop quiz: Write down three words that describe the kind of environment you want teachers to create for students, consultant Airick West said.

Fun. Peaceful. High-achieving. Safe. Rigorous. Inclusive. Nurturing. Loving.

"If you want something for your teachers, it will never occur if you don't create that for your superintendent," West said.

Minneapolis public school officials struggled to display these qualities in recent months, one of the most tumultuous and uncertain times in recent history for the district. The discord was on painful display Tuesday when board members rejected their preferred superintendent candidate, Sergio Paez, but could not consider a runner-up candidate, interim superintendent Michael Goar, before protesters shut down the meeting.

Turmoil and disarray have consumed the Minneapolis district in recent months, as a relatively new and inexperienced school board has faced some of the biggest challenges in recent years. Residents have criticized the board for a lack of vision, for being out of touch with the community and failing to hold its leaders — and its own members — accountable.

Jenny Arneson, the board's chairwoman, said board members have come to the realization that they need to change in order to improve student outcomes.

"We have to keep all of our attention on kids. It's been hard to focus and there are many many distractions," Arneson said. "But if you can't keep coming back to our central goals, ultimately we aren't going to succeed."

With its national search in shambles, national and local educators say it won't matter who the board chooses to be the next superintendent if its nine board members do not make major changes to how they conduct themselves.

In the past year, the board has been accused of micromanaging the superintendent and allowing more than a few meetings to get out of control, with protesters forcing board members to stop

conducting business. Other times, the board has seesawed on controversial issues, like budgets and curriculum materials.

Districts that have been unable to close achievement gaps are often led by school boards that are disorganized, unfocused and fractured, said Michael Casserly, the executive director of the **Council on Great City Schools**, a group that advocates for better inner-city schools.

"When you are off-task, off-priority, you can actually damage kids' lives," Casserly told the board at its retreat in Chaska earlier in January. "That's what's at stake here."

'How they treated me'

The nine board members began working together in January 2015. Nelson Inz, Don Samuels and Siad Ali were the newcomers.

Immediately, the board was tasked with finding a new school chief as then-Superintendent Bernadeia Johnson abruptly announced she was stepping down.

Johnson said that before she stepped down, she increasingly found herself trying to manage the board's intrusion into everyday school business. She said the board sometimes undermined and micromanaged her decisions.

"At some point every leader has to draw a line," Johnson said. "I think they get what they get because of how they treated me."

A series of crises

The board selected Johnson's top deputy, Michael Goar, as interim chief, and he made it clear he wanted the job permanently. But the board quickly found themselves careening from one crisis to the next.

A principal at Richard Green Central Park School was abruptly fired and a group of parents began pressuring the board for answers. Then Roosevelt High School parents, teachers and students crammed a board meeting demanding more funding after other schools were given large amounts of extra money.

Parents were further outraged after district officials abruptly announced fewer students would be offered access to a citywide autism program.

And just as the school year was about to begin, the district handed out books written by Reading Horizons as part of a new reading curriculum. Some of the books had images that many considered racist: a picture of a black girl on the cover titled "Lazy Lucy" and an American Indian girl on a book called "Nieko, the Hunting Girl."

Teachers and parents filled the boardroom demanding the school officials cancel the contract with the publisher.

Initially, the board said it did not have the authority to sever the contract, and Goar said he was sticking by the publisher because the district needed a solid reading curriculum for struggling students.

Pressure mounted and eventually the board forced Goar to cancel the contract by saying he violated two of the board policies when he authorized the agreement.

That situation was still reverberating months later during the board's January retreat.

But board member Carla Bates said she is still unsettled by the way the board used a policy to undermine Goar's decision.

"I have never been on a board when we said that our superintendent was in violation of policy," Bates said. "In my eight years, I have never done that."

Promise to change

The school board sat through hours of training where they discussed policies they plan to monitor, how to better the board's relationship with the superintendent and how to better engage community members so they feel their voices are being heard and don't have to resort to shutting down board meetings.

In the coming months, the board said it will be narrowing a set of priorities, or policies, that it will monitor in order to hold the district's administration accountable. The priorities will revolve mainly around community engagement, finance, board governance and student achievement.

The board's goal is to move away from micromanaging and delving into decisions made by district administrators.

Arneson said there will be times that the board will still need to address crises but if the board is effectively holding itself and the district's staff accountable, then that might quell community outrage.

Still, given the unknown outcome of its superintendent search, focusing on radically changing how the board operates will not be easy, Arneson said.

"It will require immense commitment of this board and huge amounts of time and dedication," Arneson said.

First, though, they have to find a new superintendent.

Anchorage News

Parents say ASD Special Ed audit skewed by lack of input

By [Daniella Rivera](#) 7:00 AM February 2, 2016
ANCHORAGE –

A 2015 audit of the Anchorage School District's Special Education Program says ASD is doing a lot of things right, but there are some problem areas. The **Council of Great City Schools'** report cites poor organization of ASD's Special Ed program, missed opportunities for available Federal Medicaid funding and too many vacant critical staff positions.

But a group of mothers of students with disabilities, who serve on the Special Education Advisory Board, say the situation is worse than the picture painted by the audit and not including parents skews the results.

"The glaring fact about this is the individuals that they interviewed for this audit. There were very few parents," said Starr Marsett.

Cassandra Stalzer added, "The District is allowing for 14 hours of public input into new text books that are being proposed for advanced placement history and there's been no opportunity for public input that affects 14 percent of the entire school population."

Parents say there is poor communication between the district and parents, that ASD staff members aren't properly trained to recognize and help students with disabilities and special education students are often isolated.

"The audit points out that the likelihood that your kid will be educated in the neighborhood classroom is highly dependent on the principal and their feelings about having special education students in their schools, and as a District, we segregate kids into special schools at twice the national average," said Stalzer.

Shelly Vuckovich says her granddaughter is having a great experience, but she knows other students haven't.

"They cheer her success, and that's what I want to see in all schools, the level of caring and acceptance," Vuckovich said. "Because it just doesn't benefit our children to be included. It benefits everyone's child to see the difference, understand there's a difference, but they're still worthwhile and incredible people."

Superintendent Ed Graff declined to speak with KTVA about the audit. He did say during the school board meeting that the District will try to collaborate more with parents as they work to improve the special education program.

OP-EDS

A cap on the amount of testing time is the wrong answer for schools

By Michael Casserly October 30

Michael Casserly is executive director of the Council of the Great City Schools.

You've seen the images: Students hunched over desks, pencils in hand, taking tests. And you've read the headlines about the stream of testing in our nation's schools. Over the past several years, parents across the country and people in the nation's educational community have been swept up by a growing controversy over standardized testing. Where did all these tests come from? What are we measuring? Are there just too many? While it is hard to answer these questions precisely, [a new study](#) by the Council of the Great City Schools can help inform a conversation that has largely consisted of dueling anecdotes.

What did we learn? We now know that the average student in one of our big-city school districts will take some 112 mandatory standardized tests between pre-kindergarten and 12th grade. That's roughly eight a year that consume approximately 20 to 25 hours each year, and that doesn't include sample tests; optional tests; tests for Advanced Placement, technical education and other such programs; tests given to special populations; quizzes and tests given by individual teachers; or time to prepare for any of these tests.

Is this too much? It depends how you look at it. Our schools clearly test more and for different reasons than other high-performing nations. At the same time, these mandatory tests absorbed only about 2.3 percent of students' time over the school year, and the time devoted to them did not affect [student outcomes](#) on the National Assessment of Educational Progress in reading and math. In fact, the time devoted to taking tests pales in comparison with how long a student might spend in football practice or some other extracurricular activity.

Nonetheless, there are clearly a lot of tests. They are often redundant, not aligned to college- and career-ready standards and not used for the purposes for which they were designed. It is not even clear that the results are used consistently by administrators or teachers to help support student growth.

Who's to blame? It was not our intention to say who's right and who's wrong, but it appears to us that there is more than enough blame to go around. Congress, the Education Department, states, local districts and even individual schools all contribute to the mindless jumble. This has resulted in an assessment system that is largely incoherent and uncoordinated. It will take a concerted effort to come up with a smarter approach.

So what do we do? At this point, some thoughtful and balanced discussion would be more constructive than the shouting and finger-pointing that have characterized much of the debate until now. That is why we are establishing a commission of educators, students, parents and members of the public to develop a blueprint for an assessment system that makes sense.

Inevitably, there will be factions that cherry-pick findings from our study to bolster their agendas. Some have called for a [moratorium](#) on testing. This would be as intellectually bankrupt as the system we have because testing is, in fact, critical to our success. When done right, testing tells us how we are doing educationally as a nation, tracks our progress, diagnoses student needs and has exposed the intolerable achievement gaps that persist in our schools. Returning to a time when we were able to mask the uneven academic attainment of students of color, poor students, English learners and students with disabilities is not morally viable.

The Obama administration, for its part, has taken an important step by acknowledging its role in the proliferation of tests. It has also made [several thoughtful proposals](#) to reduce the amount of testing. One of its proposals, however, stands out as a singularly bad idea: a blanket cap on the amount of testing time. This strikes us as a classic example of Washington trying to solve a political problem instead of the real problem. The limitation doesn't address the underlying fact that tests aren't well coordinated or aligned. It wouldn't solve the considerable redundancy of testing. And it doesn't address issues of test quality or the inappropriate use of tests.

What the proposed testing cap would do is add to the noise and contentiousness of the issue, and cause chaos as districts struggle to implement the new federal edict. If put in place, we predict that new fights would break out over how the caps are defined, and that tests backed by powerful interest groups would remain untouchable, while tests that provide teachers with the data they need would be cut. Ironically, we also expect that the tests that were left would be mainly federally mandated tests, further eroding local discretion. In short, when the smoke cleared, the testing landscape could be even worse, rather than better, than the one we have today.

In the polling we did with parents as part of this project, they reported loud and clear that they want good information on how their children are doing academically, whether they are on track and whether they will be ready for college and careers when they graduate. That should be the square we start from — not an arbitrary limit built more for the headlines than the classroom.

Read more on this topic:

[Harold O. Levy: The dumbing-down of state testing](#)

[Kevin Huffman: We don't test students as much as people think we do](#)

[Anthony A. Williams and Donald E. Graham: D.C.'s school reforms are yielding results](#)

Cleveland Plain Dealer

Cleveland students show progress; it's no time to retreat from reforms

Michael Casserly

The results are in for the 2015 administration of the National Assessment of Educational Progress, and they indicate that fourth- and eighth-grade students in the Cleveland Public Schools have made substantial progress in reading and math. This is good news not only in its own right, but it makes Cleveland one of a few bright spots in a sea of headlines about declines in scores nationwide.

Cleveland students posted a significant seven-point increase in fourth-grade reading at the same time that the nation and Ohio went up only one point. Cleveland's reading gains were larger than those of any state, and were the second-largest of any participating big-city district. In fourth-grade math, Cleveland climbed three points as the nation saw a one-point decline and Ohio went down two points.

At the eighth-grade level, the district went up one point in reading and two points in math, while the state fell three points in reading and four points in math. In all, Cleveland was one of only three major urban school systems to show improvements in all four subjects at both the fourth- and eighth-grade levels.

It is always hard to attribute substantial improvements like these to any one factor. But you don't have to look far to find a host of efforts and initiatives likely to have played a major role. Cleveland has demonstrated an early and unwavering focus on implementing Common Core standards and boosting the overall rigor of classroom teaching. In fact, the district was one of the first school districts in the nation to begin implementing the higher standards, beginning at the elementary level and building up grade by grade.

Changes in the last teacher contract were also critical to ensuring the district's ability to secure the best talent it could find, deploy these teachers where they are needed most, and increase and target professional development to enhance teaching quality throughout the system. Finally, the district's attention to providing wraparound social services was essential for addressing the full range of student needs outside of the classroom, making it easier for students to focus on scholarship and learning in the classroom. The district also pursued a more aggressive strategy for engaging parents and the community, making school improvement a shared priority.

This is a muscular set of gains that came from careful strategic thinking and planning by the school system's leadership, the talent and commitment of classroom teachers, and a confident community.

This is a time to celebrate the progress Cleveland has made against heavy state and national headwinds, but this is no time for a pause. These gains are encouraging, but the district still has a long way to go to improve its overall performance.

Inevitably, nay-sayers will suggest that the gains should have been larger. But in our work with urban school systems, we nearly always find that those systems that make significant gains over the years have to start out playing the long game. There is inevitably an initial period during which aggressive reforms rock the system, and districts are lucky if test scores remain stable. It is precisely at these early stages, with no tangible gains to point to, that urban systems feel the pressure to change their strategies and their leaders. To its credit, the Cleveland community didn't do this. It knew it had a good plan based on solid evidence and stuck with it. But if the district is to join the pantheon of the most rapidly improving urban school systems, it will have to bear down on the instructional reforms that have gotten it this far. This is what we've seen in Boston, the District of Columbia, Miami-Dade County, Atlanta and other major city school systems.

In other words, the Cleveland schools are only in the first quarter of a game they can win. This is not the time for the community to back off of its support of the school reforms the district has so thoughtfully and vigorously implemented. It is time to double down.

Casserly is executive director of the Council of the Great City Schools, which represents 68 of the largest urban school districts in America.

COMMON CORE COMMUNICATIONS

To: Henry Duvall, Council of the Great City Schools

From: GMMB

Date: February 18, 2016

RE: Common Core PSA Monitoring Report for January 1, 2016 – January 31, 2016

Overall

This monitoring report represents the twelfth summary of the results of the public service announcement distribution for the Council’s Common Core English and Spanish language television PSAs; “Conversation – English Language Arts” and “Conversation – Math”; as well as the English and Spanish language radio PSAs, “Conversation – English Language Arts” and “Conversation – Math”, covering the period between January 1 and January 31.

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 of the eight PSAs since the beginning of the campaign on January 21, 2015. 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 Language TV PSAs	5,611	92,406,468	\$2,750,244	Chicago , Boston, Washington, Detroit, Seattle
Spanish Language TV PSAs	7,149	73,510,481	\$3,613,268	New York, Los Angeles, Philadelphia, San Francisco, Washington, Boston, Tampa, Phoenix
English Language Radio PSAs	6,425	18,689,950	\$355,761	New York, Philadelphia, Dallas-Ft. Worth, Phoenix, Minneapolis-St. Paul
Spanish Language Radio PSAs	3,642	8,551,850	\$220,663	New York, Los Angeles, Houston
Total	20,424	193,158,749	\$6,939,936	New York, Los Angeles, Chicago, Philadelphia, San Francisco, Boston, Washington, Dallas-Ft. Worth, Houston, Tampa, Phoenix, Seattle, Minneapolis-St. Paul

English Language Television

For the January monitoring period, the English language television PSAs aired 430 times on 17 stations in 12 markets, amounting to 3,907,709 audience impressions and \$178,034 in donated media value.

“Conversation – English Language Arts” aired 274 times on 12 stations in 11 markets, amounting to 2,237,544 audience impressions and \$115,913 in donated media value, while “Conversation – Math” aired 156 times on 13 stations in 11 markets, amounting to 1,670,165 audience impressions and \$62,121 in donated media value.

In the Nielsen ratings, “Conversation – English Language Arts” ranked 424th out of 1352 PSAs tracked during January, while “Conversation – Math” ranked 532nd.

New markets reached this month	Peoria-Bloomington, IL
Stations with over 300,000 impressions this month	KATC-TV (Lafayette): 72 airings and 822,245 impressions KALB-TV (Alexandria): 128 airings and 751,887 impressions WHDH-TV (Boston): 12 airings and 743,194 impressions WLVI-TV (Boston): 21 airings and 472,704 impressions KXOF-TV (Laredo): 99 airings and 414,095 impressions
Cumulative percentage of airings by daypart	28% during Daytime hours (9 AM – 4 PM) 26% during Early Morning hours (5 AM – 9 AM) 25% during Late Night hours (1 AM – 5 AM) 12% during Late Evening hours (10 PM – 1 AM)
Cumulative demographic reach	Women aged 25-54: 23,221,974 impressions, or 25% overall Men aged 25-54: 20,344,141 impressions, or 22% overall

Spanish Language Television

For the January monitoring period, the Spanish language television PSAs aired 710 times on 17 stations in 11 markets, amounting to 4,812,628 audience impressions and \$329,267 in donated media value.

“Conversación – artes del lenguaje en inglés” aired 151 times on 13 stations in 10 markets, amounting to 1,541,745 audience impressions and \$57,037 in donated media value, while “Conversación – matemáticas” aired 559 times on 15 stations in 11 markets, amounting to 3,270,883 audience impressions and \$272,230 in donated media value.

In the Nielsen ratings, “Conversación – artes del lenguaje en inglés” ranked 548th out of 1352 PSAs tracked during January, while “Conversación – matemáticas” ranked 286th.

New markets reached this month	Miami-Ft. Lauderdale, FL; Monterey-Salinas, CA
Stations with over 100,000 impressions this month	WFDC-TV (Washington): 70 airings and 1,172,817 impressions KLDO-TV (Laredo): 194 airings and 820,449 impressions KCNS-TV (San Francisco): 57 airings and 600,178 impressions WMDO-TV (Washington): 41 airings and 518,490 impressions KQCA-TV (Sacramento): 73 airings and 369,477 impressions WNJU-TV (New York): 10 airings and 350,522 impressions KETF-TV (Laredo): 71 airings and 300,128 impressions KXOF-TV (Laredo): 115 airings and 246,869 impressions KMOH-TV (Phoenix): 15 airings and 123,288 impressions WSPF-TV (Tampa-St. Petersburg): 19 airings and 109,463 impressions
Cumulative percentage of airings by daypart	17% during Late Night hours (1 AM – 5 AM) 30% during Daytime hours (9 AM – 4 PM) 14% during Early Morning hours (5 AM – 9 AM) 18% during Late Evening hours (10 PM – 1 AM)
Cumulative demographic reach	Women aged 25-54: 21,665,287 impressions, or 29% overall Men aged 25-54: 23,479,426 impressions, or 32% overall

English Language Radio

For the January monitoring period, the English language radio PSAs aired 643 times on 19 stations in 14 markets, amounting to 1,751,700 audience impressions and \$36,443 in donated media value.

“Conversation – English Language Arts” aired 291 times on 15 stations in 11 markets, amounting to 640,600 audience impressions and \$15,466 donated media value, while “Conversation – Math” aired 362 times on 16 stations in 12 markets, amounting to 1,111,200 audience impressions and \$20,977 in donated media value.

New markets reached this month	Dallas-Ft. Worth, TX
Stations with over 100,000 impressions this month	WCLT-FM (Columbus): 83 airings and 572,700 impressions WCRZ-FM (Flint): 89 airings and 311,500 impressions WWBN-FM (Flint): 76 airings and 182,400 impressions WCCO-AM (Minneapolis): 11 airings and 174,400 impressions KFYI-AM (Phoenix): 12 airings and 147,600 impressions
Cumulative demographic reach	Women aged 25-54: 2,723,700 impressions, or 15% overall Men aged 25-54: 4,769,200 impressions, or 26% overall

Spanish Language Radio

For the January monitoring period, the Spanish language radio PSAs aired 620 times on 5 stations in 5 markets, amounting to 3,272,900 audience impressions and \$47,516 in donated media value.

“Conversación – artes del lenguaje en inglés” aired 338 times on 5 stations in 5 markets, amounting to 1,642,400 audience impressions and \$25,281 in donated media value, while “Conversación – matemáticas” aired 282 times on 3 stations in 3 markets amounting to 1,630,600 audience impressions and \$22,235 in donated media value.

New markets reached this month	Houston, TX
Stations with over 50,000 impressions this month	KWIZ-FM (Los Angeles): 483 airings and 3,139,500 impressions WNMA-AM (Miami-Fort Lauderdale): 62 airings and 55,800 impressions WEPN-AM (New York): 42 airings and 50,400 impressions
Cumulative demographic reach	Women aged 25-54: 1,524,400 impressions, or 17% overall Men aged 25-54: 3,366,700 impressions, or 39% overall

Summary Analysis

During the month of January, the Council’s Common Core PSA campaign produced strong performances across all PSAs. All four of the PSAs aired in top 15 markets, including New York, where the potential audience is largest and reaching viewers is toughest. The English language radio PSA aired in the Dallas, TX in January, meaning that the PSAs have now aired in each of the top 15 markets in the country. In just over twelve months, the PSA campaign has already resulted in over 190 million audience impressions, and with a cumulative donated media value of \$6,939,936, this PSA campaign is outperforming the Council’s successful PSA campaign for “Staircase” and “Future”, which had accumulated \$4,213,694 in donated media value through twelve months.

The English language television PSAs continued to perform strongly, with 430 airings leading to 3,907,709 audience impressions and \$178,034 in donated media value in January. Out of the 17 stations that aired one of the English language television PSAs, six achieved more than 100,000 impressions each. “Conversation-English Language Arts” (274 airings) aired more times than “Conversation-Math” (156 airings) in January. In January, 11% of the English language television PSAs airings occurred in Top 10 markets, which is above with the industry average of 9%.

The Spanish language television PSAs performed particularly well in January, generating 4,812,628 audience impressions and \$329,267 in donated media value. Five out of the 17 stations that aired Spanish language television PSAs in January reported over 400,000 impressions. Ten stations contributed at least 100,000 impressions. “Conversación – artes del lenguaje en inglés” (151 airings) aired fewer times than “Conversación – matemáticas” (559 airings) by a large margin. A whopping 45% of the Spanish language television PSA airings occurred in Top 25 markets, which substantially exceeds the industry average of 19%. With 73,510,481 audience impressions and \$3,613,268 in donated media value thus far, the Spanish language television PSAs are dramatically outperforming the Spanish language television PSA versions of the Council’s “Staircase” and “Future” campaign, which registered 47,259,348 audience impressions and \$1,150,316 in donated media value through their first twelve months of airing. Thus far, the current Spanish language television PSA campaign has accumulated over 26 million audience impressions, and has been three times as successful as measured by donated media value.

The English language radio PSAs garnered at least 100,000 audience impressions in five markets, including two top 15 markets: Phoenix (#11) and Minneapolis-St. Paul (#15). The English language radio PSAs reached New York and Philadelphia, which are two of the four toughest markets to penetrate in the country, during the month of January. The Spanish language radio PSAs aired 588 times combined between New York, Los Angeles, Houston, and Miami-Fort Lauderdale, meaning that 94% of the airings occurred in Top 20 markets.

In the twelfth month of airing, the PSAs continued their strong performance. We will continue to follow up with stations to ensure that public service directors have received the PSAs and are aware of the importance of educating audiences about the Common Core.

Appendix: Detail of Television PSA Airings

English Television PSA: Station Airing Detail (January 1, 2016 - January 31, 2016)													
Station	Affiliation	City	State	ELA Airings This Month	Math Airings This Month	Total Airings This Month	Audience Impressions This Month	Media Value This Month	Total ELA Airings	Total Math Airings	Total Airings	Total Audience Impressions	Total Media Value
New York, NY (#1 DMA)													
WPIX-TV	CW Television Network	New York	NY	-	-	-	-	\$0	4	4	8	859,946	\$11,506
Subtotal:				-	-	-	-	\$0	4	4	8	859,946	\$11,506
Chicago, IL (#3 DMA)													
WGN-TV	CW Television Network	Chicago	IL	-	1	1	91,051	\$2,297	-	12	12	835,778	\$17,003
Subtotal:				-	1	1	91,051	\$2,297	-	12	12	835,778	\$17,003
Philadelphia, PA (#4 DMA)													
WMCN-TV	Independent	Cherry Hill	NJ	-	-	-	-	\$0	3	3	6	56,655	\$953
Subtotal:				-	-	-	-	\$0	3	3	6	56,655	\$953
Boston, MA (#7 DMA)													
WFXT-TV	FOX Broadcasting Company	Dedham	MA	-	-	-	-	\$0	82	76	158	6,716,055	\$141,457
WHDH-TV	NBC Television Network	Boston	MA	6	6	12	743,194	\$24,051	219	201	420	26,988,843	\$792,563
WLVI-TV	CW Television Network	Boston	MA	11	10	21	472,704	\$11,601	273	271	544	12,289,413	\$288,468
WWDP-TV	NBC Television Network	West Bridgewater	MA	-	4	4	6,000	\$140	23	31	54	110,530	\$2,374
Subtotal:				17	20	37	1,221,898	\$35,792	597	579	1,176	46,104,841	\$1,224,862
Washington, DC (#8 DMA)													
WDCA-TV	MyNetwork TV	Washington	DC	-	-	-	-	\$0	18	22	40	570,531	\$15,259
WTTG-TV	FOX Broadcasting Company	Washington	DC	-	-	-	-	\$0	8	9	17	699,559	\$15,902
WUSA-TV	CBS Television Network	Washington	DC	-	11	11	193,996	\$5,236	-	25	25	534,180	\$15,796
Subtotal:				-	11	11	193,996	\$5,236	26	56	82	1,804,270	\$46,957
Detroit, MI (#12 DMA)													
WADL-TV	CBS Television Network, Independent	Clinton Township	MI	9	9	18	79,636	\$1,332	56	56	112	852,968	\$12,578
Subtotal:				9	9	18	79,636	\$1,332	56	56	112	852,968	\$12,578
Seattle, WA (#14 DMA)													
KSTW-TV	CW Television Network	Seattle	WA	2	-	2	22,929	\$528	36	14	50	572,874	\$11,701
Subtotal:				2	-	2	22,929	\$528	36	14	50	572,874	\$11,701
Sacramento, CA (#20 DMA)													
KCRA-TV	NBC Television Network	Sacramento	CA	-	-	-	-	\$0	-	15	15	578,961	\$12,755
KQCA-TV	MyNetwork TV	Sacramento	CA	-	-	-	-	\$0	-	15	15	248,717	\$5,517
Subtotal:				-	-	-	-	\$0	-	30	30	827,678	\$18,272
Baltimore, MD (#26 DMA)													
WJZ-TV	CBS Television Network	Baltimore	MD	-	-	-	-	\$0	8	-	8	220,509	\$4,432
Subtotal:				-	-	-	-	\$0	8	-	8	220,509	\$4,432
Las Vegas, NV (#41 DMA)													
KLAS-TV	CBS Television Network	Las Vegas	NV	-	-	-	-	\$0	64	46	110	2,515,150	\$81,181
Subtotal:				-	-	-	-	\$0	64	46	110	2,515,150	\$81,181
Louisville, KY (#49 DMA)													
WAVE-TV	NBC Television Network	Louisville	KY	3	2	5	42,889	\$599	24	17	41	741,814	\$10,446
Subtotal:				3	2	5	42,889	\$599	24	17	41	741,814	\$10,446

Honolulu, HI (#69 DMA)													
KIKU-TV	Independent	Honolulu	HI	3	-	3	12,897	\$268	25	17	42	179,479	\$3,314
Subtotal:				3	-	3	12,897	\$268	25	17	42	179,479	\$3,314
Des Moines, IA (#72 DMA)													
KCCI-TV	CBS Television Network	Des Moines	IA	-	-	-	-	\$0	139	-	139	2,218,296	\$44,189
Subtotal:				-	-	-	-	\$0	139	-	139	2,218,296	\$44,189
Spokane, WA (#73 DMA)													
KSKN-TV	CW Television Network	Spokane	WA	-	-	-	-	\$0	16	92	108	476,800	\$11,016
KREM-TV	CBS Television Network	Spokane	WA	-	-	-	-	\$0	-	12	12	35,592	\$867
Subtotal:				-	-	-	-	\$0	16	104	120	512,392	\$11,883
Columbia, SC (#77 DMA)													
WIS-TV	NBC Television Network	Columbia	SC	-	-	-	-	\$0	63	55	118	2,958,202	\$44,845
Subtotal:				-	-	-	-	\$0	63	55	118	2,958,202	\$44,845
Rochester, NY (#78 DMA)													
WRoc-TV	CBS Television Network	Rochester	NY	3	4	7	79,364	\$1,713	46	34	80	1,465,939	\$37,655
Subtotal:				3	4	7	79,364	\$1,713	46	34	80	1,465,939	\$37,655
Cedar Rapids, IA (#90 DMA)													
KWWL-TV	NBC Television Network	Waterloo	IA	-	-	-	-	\$0	178	-	178	2,376,188	\$46,957
Subtotal:				-	-	-	-	\$0	178	-	178	2,376,188	\$46,957
Charleston, SC (#95 DMA)													
WCSC-TV	CBS Television Network	Charleston	SC	-	-	-	-	\$0	5	10	15	185,732	\$4,021
Subtotal:				-	-	-	-	\$0	5	10	15	185,732	\$4,021
Johnston-Altonna, PA (#104 DMA)													
WATM-TV	ABC Television Network	Johnstown	PA	-	2	2	23,852	\$710	-	9	9	82,748	\$1,783
WWCP-TV	FOX Broadcasting Company	Johnstown	PA	-	-	-	-	\$0	-	1	1	11,125	\$275
Subtotal:				-	2	2	23,852	\$710	-	10	10	93,873	\$2,058
Boise, ID (#109 DMA)													
KTRV-TV	Independent	Boise	ID	13	15	28	98,327	\$3,042	167	155	322	1,456,877	\$47,296
Subtotal:				13	15	28	98,327	\$3,042	167	155	322	1,456,877	\$47,296
Lansing, MI (#114 DMA)													
WLAJ-TV	ABC Television Network	Lansing	MI	-	-	-	-	\$0	66	70	136	1,457,363	\$33,907
WLNS-TV	CBS Television Network	Lansing	MI	-	-	-	-	\$0	258	255	513	6,800,243	\$167,141
Subtotal:				-	-	-	-	\$0	324	325	649	8,257,606	\$201,048
Peoria-Bloomington, IL (#117 DMA)													
WAOE-TV	FOX Broadcasting Company	East Peoria	IL	-	1	1	5,058	\$220	-	1	1	5,058	\$220
Subtotal:				-	1	1	5,058	\$220	-	1	1	5,058	\$220
Lafayette, LA (#124 DMA)													
KATC-TV	FOX Broadcasting Company	Lafayette	LA	72	-	72	822,245	\$21,645	216	-	216	2,758,848	\$72,955
Subtotal:				72	-	72	822,245	\$21,645	216	-	216	2,758,848	\$72,955
Wheeling, WV-Steubenville, OH (#157 DMA)													
WTOV-TV	FOX Broadcasting Company	Mingo Junction	OH	-	-	-	-	\$0	-	307	307	3,393,199	\$74,318
Subtotal:				-	-	-	-	\$0	-	307	307	3,393,199	\$74,318
Biloxi-Gulfport, MS (#160 DMA)													
WXXV-TV	FOX Broadcasting Company	Gulfport	MS	-	-	-	-	\$0	48	42	90	369,786	\$15,155
Subtotal:				-	-	-	-	\$0	48	42	90	369,786	\$15,155

Clarksburg-Weston, WV (#169 DMA)													
WDTV-TV	CBS Television Network	Bridgeport	WV	-	-	-	-	\$0	7	6	13	54,768	\$1,853
WVFX-TV	FOX Broadcasting Company	Bridgeport	WV	-	-	-	-	\$0	28	33	61	282,596	\$9,787
Subtotal:				-	-	-	-	\$0	35	39	74	337,364	\$11,640
Alexandria, LA (#179 DMA)													
KALB-TV	NBC Television Network	Alexandria	LA	41	87	128	751,887	\$42,899	375	621	996	7,666,629	\$423,274
Subtotal:				41	87	128	751,887	\$42,899	375	621	996	7,666,629	\$423,274
Laredo, TX (#184 DMA)													
KXOF-TV	FOX Broadcasting Company	Laredo	TX	99	-	99	414,095	\$58,228	350	-	350	1,330,323	\$196,624
Subtotal:				99	-	99	414,095	\$58,228	350	-	350	1,330,323	\$196,624
Meridian, MS (#189 DMA)													
WTOK-TV	ABC Television Network	Meridian	MS	12	4	16	47,585	\$3,525	143	126	269	1,448,194	\$72,901
Subtotal:				12	4	16	47,585	\$3,525	143	126	269	1,448,194	\$72,901
GRAND TOTAL:				274	156	430	3,907,709	\$178,034	2,948	2,663	5,611	92,406,468	\$2,750,244

Spanish Television PSA: Station Airing Detail (January 1, 2016 - January 31, 2016)

Station	Affiliation	City	State	ELA Airings This Month	Math Airings This Month	Total Airings This Month	Audience Impressions This Month	Media Value This Month	Total ELA Airings	Total Math Airings	Total Airings	Total Audience Impressions	Total Media Value
New York, NY (#1 DMA)													
WNJU-TV	Telemundo	Fort Lee	NJ	-	10	10	350,522	\$5,219	60	89	149	6,275,034	\$89,138
Subtotal:				-	10	10	350,522	\$5,219	60	89	149	6,275,034	\$89,138
Los Angeles, CA (#2 DMA)													
KBEH-TV	Independent	Los Angeles	CA	3	3	6	44,952	\$666	17	4	21	266,441	\$7,666
Subtotal:				3	3	6	44,952	\$666	17	4	21	266,441	\$7,666
Philadelphia, PA (#4 DMA)													
WWSI-TV	Telemundo	Bala Cynwyd	PA	-	-	-	-		55	17	72	543,625	\$9,481
WPSJ-TV	Independent	Winslow	NJ	7	5	12	57,083	\$1,180	55	46	101	546,416	\$10,441
WTXF-TV	FOX Broadcasting Company	Philadelphia	PA	-	-	-	-		39	35	74	6,355,646	\$153,751
Subtotal:				7	5	12	57,083	\$1,180	149	98	247	7,445,687	\$173,673
San Francisco, CA (#6 DMA)													
KCNS-TV	MundoFOX	San Francisco	CA	28	29	57	600,178	\$29,498	78	92	170	1,735,255	\$80,666
KTNC-TV		San Francisco	CA	1	1	2	24,032	\$736	13	10	23	264,436	\$11,597
Subtotal:				29	30	59	624,210	\$30,234	91	102	193	1,999,691	\$92,263
Boston, MA (#7 DMA)													
WFZX-TV	MundoFOX	Newton	MA	11	6	17	32,556	\$965	25	14	39	150,854	\$4,387
Subtotal:				11	6	17	32,556	\$965	25	14	39	150,854	\$4,387
Washington, DC (#8 DMA)													
WFDC-TV	Univision Television	Washington	DC	36	34	70	1,172,817	\$37,902	403	396	799	13,164,574	\$373,231
WMDO-TV	UniMas	Washington	DC	23	18	41	518,490	\$17,931	315	317	632	8,320,607	\$272,608
Subtotal:				59	52	111	1,691,307	\$55,833	718	713	1,431	21,485,181	\$645,839
Phoenix, AZ (#11 DMA)													
KMOH-TV	MundoFOX	Kingman	AZ	10	5	15	123,288	\$5,058	21	19	40	275,709	\$11,184
Subtotal:				10	5	15	123,288	\$5,058	21	19	40	275,709	\$11,184
Tampa-St. Petersburg, FL (#13 DMA)													
WSPF-TV	MundoFOX	Tampa	FL	11	8	19	109,463	\$4,405	27	21	48	289,408	\$10,868
Subtotal:				11	8	19	109,463	\$4,405	27	21	48	289,408	\$10,868
Miami-Ft. Lauderdale, FL (#16 DMA)													
KMOH-TV	MundoFOX	Doral	FL	2	1	3	19,644	\$557	2	1	3	19,644	\$557
Subtotal:				2	1	3	19,644	\$557	2	1	3	19,644	\$557
Sacramento, CA (#20 DMA)													
KQCA-TV	MyNetworkTV	Sacramento	CA	14	59	73	369,477	\$12,653	79	200	279	3,355,913	\$103,002
Subtotal:				14	59	73	369,477	\$12,653	79	200	279	3,355,913	\$103,002
Portland, OR (#23 DMA)													
KUNP-TV	Univision Television	Portland	OR	-	-	-	-	\$0	941	971	1,912	12,973,110	\$328,566
KRCW-TV	CW Television Network	Beaverton	OR	-	-	-	-	\$0	1	-	1	11,889	\$215
Subtotal:				-	-	-	-	\$0	942	971	1,913	12,984,999	\$328,781
Fort Myers-Naples, FLA (#62 DMA)													
WFTX-TV	FOX Broadcasting Company	Cape Coral	FL	-	-	-	-	\$0	212	-	212	4,236,130	\$137,708
Subtotal:				-	-	-	-	\$0	212	-	212	4,236,130	\$137,708

Cedar Rapids, IA (#90 DMA)													
KWWL-TV	NBC Television Network	Waterloo	IA	-	-	-	-	\$0	-	179	179	2,413,423	\$46,659
Subtotal:				-	-	-	-	\$0	-	179	179	2,413,423	\$46,659
Yakima, WA (#122 DMA)													
KUNW-TV	Univision Television	Yakima	WA	-	-	-	-	\$0	1	-	1	5,383	\$92
Subtotal:				-	-	-	-	\$0	1	-	1	5,383	\$92
Monterey-Salinas, CA (#125 DMA)													
KDJT-TV	UniMas	Monterey	CA	2	-	2	6,810	\$230	2	-	2	6,810	\$230
KSMS-TV	UniMas, Univision Television	Monterey	CA	3	-	3	15,870	\$900	3	-	3	15,870	\$900
Subtotal:				5	-	5	22,680	\$1,130	5	-	5	22,680	\$1,130
Laredo, TX (#184 DMA)													
KETF-TV	UniMas	Laredo	TX	-	71	71	300,128	\$46,852	-	446	446	1,694,715	\$245,439
KLDO-TV	Univision Television	Laredo	TX	-	194	194	820,449	\$123,244	-	922	922	6,117,664	\$971,494
KXOF-TV	FOX Broadcasting Company	Laredo	TX	-	115	115	246,869	\$41,271	-	1,021	1,021	4,471,925	\$743,388
Subtotal:				-	380	380	1,367,446	\$211,367	-	2,389	2,389	12,284,304	\$1,960,321
GRAND TOTAL:				151	559	710	4,812,628	\$329,267	2,349	4,800	7,149	73,510,481	\$3,613,268

Hits for the Three-Minute Common Core **CONVERSATION** Video

VIMEO

Three-Minute Common Core CONVERSATION Video in **English** 01/09/15 to 03/01/16

Plays: 136,395

Plays occur when the entire video is watched

Loads: 48,808,815

Loads occur when the video is accessed or downloaded

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Common Core State Standards Initiative	Corestandards.org	115,415	48,271,097
Council of the Great City Schools	Cgcs.org	2,344	58,128
Council of the Great City Schools	Commoncoreworks.org	2,264	25,324
Central Charter School (Broward County)	Ccsgrade4.com	1,572	5,884
Google	Google.com	1,189	111,546

VIMEO

Three-Minute Common Core **CONVERSATION** Video in **Spanish** 01/09/15 to 03/01/16

Plays: 4,984

Plays occur when the entire video is watched

Loads: 48,268,117

Loads occur when the video is just accessed

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Common Core State Standards Initiative	Corestandards.org	3,136	48,016,063
Council of the Great City Schools	Cgcs.org	281	6,861
Council of the Great City Schools	Commoncoreworks.org	164	4,037
Be A Learning Hero	Belearninghero.org	51	964

YOUTUBE

Three-Minute Common Core **CONVERSATION** Video in **English** on YouTube
03/03/15 to 03/01/16

Views: 168

Top Websites to Access Video on YouTube

Traffic Source: External Video Player		
Organization Name	Website Domain	No. of Plays
Facebook	Facebook.com	17
GMMB	Gmmb.com	2
Google	Google.com	1

Traffic Source: Embedded Video Player		
Organization Name	Website Domain	No. of Plays
GMMB	Gmmb.com	2
Microsoft Online	Live.com	1

YOUTUBE

Three-Minute Common Core **CONVERSATION** Video in **Spanish** 03/03/15 to 03/01/16

Views: 33

Top Websites to Access Video on YouTube

Traffic Source: External Video Player		
Organization Name	Website Domain	No. of Plays
Schoolwires	Schoolwires.com	3
Google	Google.com	1

Traffic Source: Embedded Video Player		
Organization Name	Website Domain	No. of Plays
N/A	N/A	N/A

Parent Roadmaps
Council of the Great City Schools' Combined Web Site Statistics

Parent Roadmaps- English Language Arts 6/1/12 to 03/01/16

Page views: 279,114

Page views are defined as number of times a web page was viewed

Unique Page views: 201,746

Unique page views are the total number of unique (individual) visitors to a specific web page during the same session (visit)

Parent Roadmaps- Mathematics 6/1/12 to 03/01/16

Page views: 257,389

Page views are defined as number of times a web page was viewed

Unique Page views: 187,662

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) 6/1/12 to 03/01/16

Page views: 33,205

Page views are defined as number of times a web page was viewed

Unique Page views: 23,633

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) 6/1/12 to 03/01/16

Page views: 30,899

Page views are defined as number of times a web page was viewed

Unique Page views: 21,105

Unique page views are the total number of unique (individual) visitors to a specific web page during the same session (visit)

Hits for the Three-Minute Common Core Video

VIMEO

Three-Minute Common Core Video in **English** on Vimeo 10/20/12 to 03/01/16

Plays: 800,461

Plays occur when the entire video is watched

Loads: 60,438,941

Loads occur when the video is accessed or downloaded

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Common Core State Standards Initiative	Corestandards.org	407,604	52,190,555
Council of the Great City Schools	Commoncoreworks.org	28,631	170,819
Council of the Great City Schools	Cgcs.org	10,870	244,713
Orange County Public Schools	Pdsonline.ocps.net	8,053	15,527

VIMEO

Three-Minute Common Core Video in **Spanish** on Vimeo 10/20/12 to 03/01/16

Plays: 18,684

Plays occur when the entire video is watched

Loads: 1,027,942

Loads occur when the video is just accessed

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	2,592	52,253
Council of the Great City Schools	Cgcs.org	1,560	108,681
Santa Ana Unified School District	Sausd.us	308	46,337
Arizona Department of Education	Azed.gov	238	915

YOUTUBE

Three-Minute Common Core Video in **English** on YouTube 03/15/13 to 03/01/16

Views: 25,449

Top Websites to Access Video on YouTube

Traffic Source: External Video Player		
Organization Name	Website Domain	No. of Plays
State of California	Ca.gov	4,561
Google	Google.com	298
Facebook	Facebook.com	131
Arkansas Department of Education	arkansased.org	65

Traffic Source: Embedded Video Player		
Organization Name	Website Domain	No. of Plays
State of California	Ca.gov	16,901
Hemet Unified School District (Hemet, CA)	Hemetusd.k12.ca.us	1,192
Raise The Bar Parents	Raisethebarparents.org	223

YOUTUBE

Three-Minute Common Core Video in **Spanish** on YouTube 03/15/13 to 03/01/16

Views: 1,568

Top Websites to Access Video on YouTube

Traffic Source: External Video Player		
Organization Name	Website Domain	No. of Plays
Google	Google.com	183
State of California	Ca.gov	29
Bing	Bing.com	7

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	59
Davis Joint Unified School District	DjUSD.net	29

VIMEO

From the Page to the Classroom: Implementing the Common Core State Standards – English Language Arts and Literacy 6/12/12 to 03/01/16

Plays: 14,329

Plays occur when the entire video is watched

Loads: 55,992

Loads occur when the video is accessed or downloaded

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Fresno Unified	Beta.fresnounified.org	107	194
Bing	Bing.com	78	144
Boston Public School Curriculum and Instruction	bpscurriculumandinstruction.weebly.com/	57	3,023
Yahoo	Yahoo.com	56	97

From the Page to the Classroom: Implementing the Common Core State Standards – Mathematics 6/12/12 to 03/01/16

Plays: 11,238

Plays occur when the entire video is watched

Loads: 62,719

Loads occur when the video is just accessed

Top Websites to Access Video on Vimeo

Organization Name	Website Domain	No. of Plays	No. of Loads
Boston Public School Mathematics	http://bpsmathematics.weebly.com/	244	11,744
Atlanta Public Schools	Atlanta.k12.ga.us	87	2,682
Bing	Bing.com	64	120
Fresno Unified	Beta.fresnounified.org	61	104

BERNARD HARRIS SCHOLARSHIPS

ExxonMobil Bernard Harris Math and Science Scholarships



Inform Your Students Today About the ExxonMobil Bernard Harris Math and Science Scholarships

Named for the first African American to walk in space, **ExxonMobil Bernard Harris Math and Science Scholarships** are available to 2016 graduating high school seniors in school districts represented by the Council of the Great City Schools.

Four scholarships for two males and two females --- \$5,000 each --- will be awarded to two African American and two Hispanic students on behalf of the former NASA astronaut, physician and businessman, Dr. Bernard Harris. Deadline for submissions is **April 15, 2016**.

***Students may apply to the scholarship online.

Please distribute the scholarship application and guidelines in your districts. For students to apply, they should click [here](#) or access the Council's website.

Michael Casserly
Executive Director
Council of the Great City Schools

ExxonMobil Bernard Harris Math and Science Scholarships



**2016
Application
Guidelines**



ExxonMobil



Scholarships awarded in June 2016

For questions, please visit www.cgcs.org or call 202.393.2427

ExxonMobil Bernard Harris Math and Science Scholarships

2016 Application Guidelines

COUNCIL OF THE GREAT CITY SCHOOLS

Member School Districts

Albuquerque
Anchorage
Arlington, Texas
Atlanta
Austin
Baltimore
Birmingham
Boston
Bridgeport
Broward County
Buffalo
Charleston
Charlotte-Mecklenburg
Chicago
Cincinnati
Clark County
Cleveland
Columbus
Dallas
Dayton
Denver
Des Moines
Detroit
District of Columbia
Duval County
El Paso
Fort Worth
Fresno
Guilford County
Hillsborough County
Honolulu
Houston
Indianapolis
Jackson
Jefferson County, Kentucky
Kansas City
Long Beach
Los Angeles
Metropolitan Nashville
Miami-Dade County
Milwaukee
Minneapolis
New Orleans
New York City
Newark
Norfolk
Oakland
Oklahoma City
Omaha
Orange County, Florida
Palm Beach County
Philadelphia
Pinellas County, Florida
Pittsburgh
Portland, Oregon
Providence
Richmond
Rochester
Sacramento
San Antonio
San Diego
San Francisco
Santa Ana
Seattle
Shelby County (Memphis)
St. Louis
St. Paul
Toledo
Tulsa
Wichita

PROGRAM DESCRIPTION

ExxonMobil and Dr. Bernard Harris strongly believe that education is key to progress, development and economic growth in our country. Together, they have developed a partnership to increase awareness about the need for more math and science graduates, especially among underrepresented populations. For the seventh year, this scholarship is part of their efforts to support students of color who plan to pursue math- and science-related degrees.

Four scholarships for two boys and two girls, with a value of \$5,000 each, will be awarded in June 2016 to two Black and two Hispanic students currently completing their senior year of high school in a member district of the Council of the Great City Schools (see list of member districts on left). Applicants must be accepted for full-time enrollment at a four-year college or university in the next academic year and pursuing a degree in Science, Technology, Engineering or Mathematics (STEM).

The scholarships, named in recognition of Dr. Bernard A. Harris, Jr., serve underrepresented students pursuing careers in the fields of Science, Technology, Engineering and Mathematics. As a former astronaut, physician and businessman, Dr. Harris is an outstanding role model dedicated to serving as a mentor to the scholarship recipients.

Applications will be reviewed by a committee appointed by the Council of the Great City Schools. Recipients will be selected by Dr. Harris and notified in June. The scholarship will be paid to the university of the recipient's choice and can be applied to tuition and related expenses during the 2016-2017 academic year.

PROGRAM GUIDELINES

To apply for the 2016 scholarship, this application must be submitted online by April 15, 2016, and should include evidence of the applicant's academic achievement in high school, leadership skills or community service in the area of Science, Technology, Engineering or Mathematics and the applicant's commitment to pursue a career in a STEM field. To be eligible for the scholarship, the applicant must have a minimum 3.0 unweighted grade point average and have been accepted as a full-time student at a four-year institution of higher education.

No person may receive more than one award administered by the Council of the Great City Schools in the same academic year. Employees or immediate family members of employees of ExxonMobil, The Harris Foundation or the Council of the Great City Schools are not eligible to apply for these scholarships.

***All applicants must attend a public school in a Council of the Great City Schools district.**

Go to: www.cgcs.org/Page/211 to find the list of CGCS districts.

ExxonMobil Bernard Harris Math and Science Scholarships

2016 Partners



The ExxonMobil Foundation is the primary philanthropic arm of Exxon Mobil Corporation (NYSE:XOM) in the United States. The foundation and the corporation engage in a range of philanthropic activities that advance education, promote women as catalysts for economic development and combat malaria. In the United States, ExxonMobil supports initiatives to improve math and science education at the K-12 and higher education levels. In 2014, the ExxonMobil Foundation together with Exxon Mobil Corporation, its divisions and affiliates along with employees and retirees, provided \$279 million in contributions worldwide. www.exxonmobil.com/community



THE
HARRIS
FOUNDATION

Founded in 1998, The Harris Foundation is a 501 (c) (3), non-profit organization based in Houston, 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 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 50,000 students have participated and benefited from THF programs. www.theharrisfoundation.org



The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools, and is based in Washington, D.C. Composed of 70 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. www.cgcs.org



2016 ExxonMobil Bernard Harris Math and Science Scholarships

Student Information

Name

First

Middle

Last

Address

Address Line 1

Address Line 2

City

State

Zip Code

Phone

Email

CGCS Member School District

School

Gender

Male Female

Race

African-American or Black Hispanic

College Acceptances

College/University Name

Attending?

Yes No Not Sure

What is your intended major?

College/University Name

Attending?

Yes No Not Sure

College/University Name

Attending?

Yes No Not Sure

Please attach copies of your college acceptance letters

Academic Coursework and Achievement

Please list all Science, Technology, Engineering and Math courses taken and grades received in those courses. Attach an additional page of courses taken if necessary.

Course Name

Grade

Course Name

Grade

Course Name

Grade

Course Name

Grade

Course Name

Grade

Course Name

Grade

Course Name

Grade

Course Name

Grade

Attach an additional page of courses taken if necessary

Overall Unweighted Grade Point Average

Overall Weighted Grade Point Average

(Minimum of 3.0 unweighted grade point average)

Class Rank

Transcript

Please attach a copy of your high school transcript in PDF, or JPEG/JPG formats

SAT and/or ACT Scores

SAT Score Overall

(Reading and Math Scores combined must be over 1000)

SAT Score Math

SAT Score Reading

SAT Score Writing

ACT Composite

Composite Score must be 21 or better

ACT Math

ACT Reading

ACT Science

ACT English

Community Service and Extracurricular Activities

Please list any extracurricular activities, community service or other experience that demonstrates commitment to pursuing a career in a STEM field. Also indicate if any leadership position was held.

Activity

Office Held

Activity

Office Held

Activity

Office Held

Activity

Office Held

Activity

Office Held

Essays

Applicants are required to submit two (2) one-page essays.

Why have you chosen to pursue a career in a STEM field and how do you see yourself contributing in that field?

Please upload an one page essay, double-spaced, and in Times New Roman 12-point-font

Explain how you have demonstrated leadership both in and out of school.

Please upload an one page essay, double-spaced, and in Times New Roman 12-point-font

Letters of Recommendation

Please submit three (3) letters of recommendation from individuals who know you well, at least two (2) of those letters must be from a teacher, counselor, principal or other school professional.

Photograph

Please submit a photograph of yourself for publication. (GIF, JPEG/JPG, or PNG formats only)

Thank you for applying for the ExxonMobil Bernard Harris Math and Science Scholarship. Please note that incomplete applications will not be considered. If you need to mail any supporting documents please send to:

Council of the Great City Schools

Attn: ExxonMobil Bernard Harris Math and Science Scholarship

1301 Pennsylvania Ave, NW

Washington, DC 20004

All complete applications must be submitted by April 15, 2016 at 5:00pm EST.

- **Completed Application**
- **Official High School Transcript**
- **A photograph of yourself for publication**
- **College acceptance letters**
- **Three (3) letters of recommendation**
- **Two (2) one-page essays**

Parent/Guardian Signature

I hereby affirm that the information contained in this application is accurate and complete to the best of my knowledge.

THE URBAN EDUCATOR

IN THIS ISSUE



- L.A. Veteran Takes Reins, **p.3**
- Creating Principals, **p.7**
- LEGISLATIVE**
- Details of New Law, **p. 10**

Acting Education Secretary to Address Urban Educators

Acting U.S. Secretary of Education John King will address urban education leaders March 20 at the Council of the Great City Schools Annual Legislative/Policy Conference, March 19-22, at the historic Mayflower Hotel in Washington.



John King

He officially became acting secretary in January, succeeding Arne Duncan, who stepped down in December after seven years of leading education policy in America.

Education Secretary *continued on page 3*

Council Unveils Males of Color Website

The Council of the Great City Schools has launched a new website to help urban school districts across the nation improve the academic outcomes of males of color.

The site, www.malesofcolor.org, offers an array of materials, reports, data analysis, promising practices and other resources to support the work big-city school districts, administrators, teachers and the community are doing to help males of color succeed.

In July 2014, 60 of the largest urban school districts in the nation signed a public pledge to improve the educational

Males of Color *continued on page 6*



Council Reaches 60-Year Mark

A new study recently released by the Council of the Great City Schools provides hard data on the extent of mandatory testing in the nation's schools, evoking President Obama's attention and a meeting with the commander in chief.

Last March, the nation's primary coalition of large urban public schools led a delegation of big-city school leaders to the White House to discuss legislation, reforms, progress and challenges with the president, aimed at improving urban public education.

And in the fall of 2014, President Obama recognized and announced a Council-initiated pledge by more than 60 urban school districts to recommit to helping African American and Latino males succeed.

These and many other developments contribute to and mark 60 years of service to America's large urban public schools by the Council of the Great City Schools.

Co-founded in 1956 by R. Sargent Shriver, well-known father of the Peace Corps, the Council began as an ad hoc group of superintendents representing the

nation's 12 largest school districts. Shriver was president of the Chicago school board at the time.

The coalition has grown from a networking and study group into a national education policy and research organization in Washington, D.C., with a membership today of 68 big-city school districts, serving more than 7.2 million culturally diverse students.

"The Council of the Great City Schools is not here to reflect or perpetuate the inequities under which too many of our urban students suffer, but to overcome them," says Executive Director Michael Casserly. "As we celebrate 60 years as the voice of urban education, our next 20 years will be devoted to making sure that all our children have the academic tools for success."

On behalf of urban schools, the Council helps shape legislation, conducts city-by-city research, supports instructional and operational reforms and serves as a clearinghouse for information to the news media and others inquiring about urban

60-Year Mark *continued on page 4*

Acting Education Secretary Kicks Off Tour in El Paso

The nation will look to the El Paso Independent School District in Texas for guidance as more states begin to see the number of Latino students in public schools soar, Acting U.S. Secretary of Education John King said recently during a visit to the district's Bowie High School.

"El Paso represents the future ... the model for the diverse, multi-lingual communities most of America will experience soon," King said. "El Paso is also a community that values education and we know we can learn a lot from their experience."

King was in El Paso on Jan.14 to launch

his "Opportunity Across America" tour to highlight good work under way in schools and hear stories and experiences about what is working in successful classrooms. El Paso was his first stop in a five-city journey, which included visits to Houston and Philadelphia schools.

During his visit, King joined El Paso Independent School District Superintendent Juan Cabrera and Rep. Beto O'Rourke, D-Tex., to tour the gardens of Bowie High School and lead a round-table discussion with local education, civic and business leaders.

Conversations revolved around the recently adopted Every Student Succeeds Act, which replaced the No Child Left Behind Act that was adopted in 2001 and relied heavily on standardized testing.

Cabrera told King that the El Paso district has shifted its focus in the classroom away from standardized testing preparation, and toward active learning strategies that are more aligned with quality teaching and learning in today's classrooms.

El Paso continued on page 5



El Paso Schools Superintendent Juan Cabrera, right, welcomes Acting U.S. Secretary of Education John King and Congressman Beto O'Rourke, center, to Bowie High School.



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Find the Council on:



L.A. Names New Superintendent; Philly Leader's Tenure Extended; Denver Appoints Acting Chief; Guilford Co. Names Co-Interim Supts.



Michelle King

Michelle King has deep roots in the Los Angeles Unified School District, the nation's second largest school system.

A graduate of the district, she began her teaching career as a science and math teacher at a Los Angeles middle school. She has held a variety of positions in the district: high school principal, assistant superintendent in health and human services, chief instructional officer for high schools and senior regional administrator. In addition, King served in the No. 2 position in the district under the last two superintendents, John Deasy and Ramon Cortines.

And now King will take the reins herself, having recently been selected as the superintendent, becoming the first woman in more than 80 years and the first African-American woman to lead the 643,493-student school system.

During her tenure as an administrator, King led instructional reform plans to address graduation requirements and was a strong proponent of the district's restorative justice initiative, which district officials credit with reducing student suspensions and expulsions.

In a press release, board member Mónica Ratliff said that King's selection was a historical moment for the district. "It is an honor to be able to share in the announcement that this smart, thorough, transparent, organized, firm, diligent and compassionate woman is our new superintendent," said Ratliff. "I look forward to continuing to support her as she leads this district to even greater success."

Philly Stays the Course

When William Hite was selected as superintendent of the School District of Philadelphia in 2012, the school district



William Hite

faced a budget deficit of approximately \$720 million. To close the deficit, he had to make some tough decisions, including closing 31 schools and reducing the workforce.

Despite the financial challenges, Hite has encouraged innovation and equity, opening three new high schools and launching a redesign initiative, in which educators, community organizations and universities are invited to submit a proposal to redesign a school.

As a result, he was recently given a contract extension to lead the district for five more years through August 2022.

Members of the School Reform Commission (SRC), which governs the school district, voted to extend Hite's contract to ensure leadership continuity in the school system.

"Dr. Hite has demonstrated strong leadership through an extraordinarily difficult time, provided sound fiscal oversight and implemented a vision that builds on our school system's strengths with a focus on equity and high expectations," said SRC Chair Marjorie Neff.

Districts Select Acting Leaders

Susana Cordova is a product of Denver Public Schools and a first-generation college graduate who has served in several positions in the school district, including teacher, principal, chief academic officer and chief schools officer.

She will now add one more position to the list: acting superintendent. Cordova was recently appointed the district's acting superintendent, while Superintendent Tom Boasberg takes six months of unpaid family leave to travel and live abroad with his family and learn Spanish. Boasberg has led the school district since 2009.

And Guilford County Schools in Greensboro, N.C., has named two co-interim superintendents to lead the 72,000-student school district when Superintendent Maurice Green leaves this spring.

Nora Carr, chief of staff, and Terrence Young, chief information officer, will split the superintendent responsibilities until a new leader is selected, which the district hopes to have in place before the start of the 2016-17 school year.

Green is leaving the district he has led since 2008 to lead a private foundation in Winston-Salem, N.C.

Under his leadership, high school graduation rates have increased to an all-time high of 89.3 percent, with graduation rates for African American students and Latinos also increasing. In addition, students have improved their performance on the ACT college entrance exams and the district has received national awards for its character education program.



Education Secretary *continued from page 1*

"In 2016, I hope you'll join me as I recommit myself to ensuring that every child in America – regardless of background or circumstance – has access to an excellent education," said King, the former New York State education commissioner.

The Council conference will focus on the new Every Student Succeeds Act (ESSA), explaining the recently adopted federal law and how to transition to and implement the reauthorized Elementary and Secondary Education Act (ESEA) that replaces the No Child Left Behind Act of 2001.

Funding increases for education in the Fiscal Year 2016 Omnibus bill will also be discussed at the conference, along with other actions in the 114th Congress.

Conference highlights are on page 9, and registration information can be accessed at www.cgcs.org.

60-Year Mark *continued from page 1*

schools nationally. The organization also provides a network for school districts sharing common challenges to exchange information and address issues.

The Early Years

The urban-schools coalition began as the Research Council for the Great City Schools Improvement, with then-superintendent of the Chicago Public Schools as its first president. The ad hoc group became incorporated in 1961.

But it was in 1969 that the group broadened its focus to include education policy, and adopted its present-day name. And to help improve the quality of urban education in America, the coalition included school board members from its districts to join superintendents in its leadership ranks.

With the swirl of congressional activity flourishing in the nation's capital at the time, the Council moved its headquarters to Washington, D.C., from Chicago. It began legislative work on Capitol Hill and its membership had grown to about 20 urban school districts.

War on Poverty

During the era of the 1960s, legislation brought increased federal government involvement in education. The first Elementary and Secondary Education Act (ESEA) was enacted in 1965. President Lyndon Johnson had launched the "War on Poverty," and there was a major influx of minorities migrating to the big cities from the rural South.

The first formulas to target federal money toward cities occurred in the '60s and '70s. The Council had played a major role in pushing through or amending legislation in favor of urban schools. The Council's emphasis on targeting federal aid remains to this day.

Initiating Legislation

During the 1980s, the Council began initiating legislation. It was successful in spearheading the federal Magnet School

Assistance Act, Dropout Prevention Demonstration Act, Teacher Professional Development Act, Urban Schools of America (USA) Act and Smart Start, while leading reforms in Chapter 1, Vocational Education and the Drug Free School Act.

In 1982, the Council's membership skyrocketed, growing to 37 districts almost overnight. President Ronald Reagan was in office and during his administration federal support for urban education was in serious question.



Accountability

In 1983, the U.S. Department of Education's "Nation at Risk" report brought the issue of accountability to the forefront. The report, and the National Governors Association's 1986 "Time for Results" report, were wake-up calls to Americans about the need to improve public education.

The Council's member school districts went through what executive director Casserly calls "a period of self-examination" from the late '80s to 1991.

Urban School Goals

To respond to the growing concerns about American education, President George Bush in 1989 and the National Governors Association formulated six national education goals. The Council also sprang into action to develop a parallel set of goals to reflect the specific needs of urban schools and students. Then in 1991, it held an urban education summit, which officially adopted the goals.

A year later, the coalition released its first-ever "report card" on the state of urban education in America, which gave indicators of urban school progress toward

achieving the National Urban Education Goals.

New Leadership

Leadership of the Council changed in 1992, when Casserly took the helm after the long-time tenure of Samuel Husk, who had been executive director for 17 years.

Today, Casserly is believed to be the longest-serving chief among the major national education membership organizations, beginning his 24th year at the helm. Previously, he had served as the Council's director of legislation and research for 15 years.

Under Casserly, the Council has unified urban schools nationwide around a vision of reform and improvement. National task forces have been launched to focus on achievement gaps, leadership and governance, finance, professional development and bilingual education.

Milestones

In 1997, the Council convened what news reports called a "landmark" meeting between big-city mayors and urban school superintendents. The historic summit resulted in a pledge of cooperation and a call for further dialogue between schools and government.

A few years later in 2000, the Council approached the National Assessment Governing Board (NAGB) to request a trial National Assessment of Educational Progress (NAEP) for big-city school systems that wanted to volunteer for the rigorous national test.

"The Council and its member districts are fully committed to the standards movement, yet we have no way to determine our status or our progress on the standards," argued Casserly before the governing board.

"This is a courageous act by the urban schools. It's a sea change," said then-NAGB chairman Mark Musick in *Education Week*. NAGB supported the idea, and subsequently the urban NAEP was launched.

60-Year Mark *continued on page 5*

60-Year Mark *continued from page 4*

Major Research

In 2001, the Council released the first compilation of how the nation's large city school systems are performing on the academic goals and standards set by the individual states for their children. It launched the annual [*Beating the Odds: A City-by-City Analysis of Reading and Math Performance and Achievement Gaps on State Assessments*](#).

A year later, the Council released a first-of-its-kind study with research group MDRC called [*Foundations for Success: Case Studies of How Urban School Systems Improve Student Achievement*](#), which looked at the similarities among urban school systems that were boosting performance city-wide and contrasted their practices with systems that had not seen major gains.

Today's Council

The Council has a special mission to educate the nation's most culturally diverse student body to the highest academic standards. Consequently, it was the first national education membership organization to call for what became the Common Core State Standards, and is now actively working to support their implementation in urban school systems nationwide.

The Council has also launched a series of efforts to improve academic outcomes for its members' burgeoning English language learner populations.

To back up its academic priorities at the ground level, the Council initiated technical assistance teams that are invited by urban school districts to help improve instruction, special and bilingual education, budget and finance operations, food services, transportation and other services.

Moreover, the Council has taken policy and legislative positions that consistently

reflect bipartisan urban school priorities for high standards, academic results, accountability and equity.

In addition to spearheading academic reforms, the coalition has worked to improve management operations in urban school systems. It initiated and developed the first nationwide educational performance-management system with comparable data on non-instructional key performance indicators. Results have saved urban school districts millions of dollars in non-instructional costs and improved efficiencies.

The Council has also worked to improve public confidence of urban schools. It has produced award-winning videos and public service announcements, staged national town hall meetings on issues of the day in urban education, and has held forums at *USA TODAY* headquarters to bring urban educators, business leaders and news executives together to improve education in America.

Since issuing its widely publicized report in 2010 titled [*A Call for Change: The Social and Educational Factors Contributing*](#)



Council Executive Director Michael Casserly meets President Obama before White House meeting with urban-school leaders last March. (Official White House Photo by Pete Souza)

[*to the Outcomes of Black Males in Urban Schools*](#),

the Council has worked to identify solutions and spearhead systemic change in urban school districts to help male students of color succeed.

And following the release in

October of its comprehensive study of student testing in the nation's big-city schools, the Council will soon launch a commission to evaluate and improve the quality and quantity of student assessments in public schools nationwide.

As the Council begins its 60th year of service to urban schools, Executive Director Casserly stresses, "The Council will continue to tackle the challenges we face and trumpet the victories we've made."

El Paso *continued from page 2*

"Our schools are changing to meet the fast-paced needs of the 21st century," Cabrera said. "I hope the secretary took with him the knowledge that El Paso ISD is at the forefront of classroom innovation, and that despite what some would see as challenges in our student populations, we are making the commitment to provide high-quality, forward-thinking instruction to everyone enrolled in our schools."

The new strategies, he said, include things like critical thinking, hands-on learning and bi-literacy.

King pointed to the growing dual-language program throughout the El Paso school system, as well as the new Mesita Early Childhood Development Center, as examples of innovative programs that could make a difference in the lives of students.

The visit by the secretary allowed several students the opportunity to interact with one of the highest members of the federal government.

"It was important that he came to Bowie. I'm happy he was here," senior Cynthia Gomez said. "He got to see the challenges and advantages of being in a school that looks like Bowie ... which has a large Hispanic population."

Coronado High School junior Diego de la Torre sat at the roundtable discussion as an invited guest of the district and Congressman O'Rourke.

He was able to discuss testing fatigue with King and other education leaders gathered at Bowie.

"It was a little intimidating being at the table with the adults, but I was also very excited to share my perspective with Secretary King," he said. "I told him students like me are tired of standardized tests and that there needs to be a better way to assess the work that we are doing as students, and our teachers are doing as well."



Males of Color continued from page 1

outcomes for boys and young men of color by implementing a set of evidence-based strategies that range from early childhood through graduation.

Building upon the pledge, the Council has worked alongside district leadership to develop implementation plans based on actionable steps and measurable goals to raise the standard for young boys and men of color.

Several of these implementation plans from Council member districts are featured on the Males of Color website and docu-

ment a number of important steps districts are taking, ranging from developing strategic plans and hosting city-wide summits of education and community leaders, to expanding access to pre-K and reducing counterproductive suspension policies.

The website also includes success stories as well as news articles about promising initiatives to help young men and boys of color reach their full potential.

“This new Males of Color website is part of the continuing effort by the nation’s largest urban school systems to improve outcomes for our students,” says Council Executive Director Michael Casserly.

School Superintendents In Broward County And Jackson, Mississippi, Honored



Robert Runcie

Superintendent Robert Runcie of Broward County Public Schools in Fort Lauderdale, Fla., was recently honored as the state’s 2016 Superintendent of the Year by the Florida Association of District Schools Superintendents.

Appointed superintendent in October 2011, Runcie has implemented several important education initiatives while leading the sixth largest public school system in the nation.

Under his leadership, Runcie garnered community support for the passage of an \$800-million bond to renovate and improve the safety of schools. In addition, the school system has become a national model for reassessing school discipline.

Runcie is now eligible to become a finalist for the 2016 National Superintendent of



Cedrick Gray

the Year presented by the American Association of School Administrators.

And Runcie is not the only big-city superintendent to receive top honors for his leadership. Superintendent Cedrick Gray of Mississippi’s Jackson Public Schools was the recent recipient of the 2015 Joseph E. Hill Superintendent of the Year Award presented by the National Alliance of Black School Educators. The award is given to current superintendents who have demonstrated a quality of leadership that has resulted in significant, positive outcomes for students of African descent.

Since being named superintendent in 2012, the district’s state and national accreditation has been restored, while graduation rates have increased and dropout rates have decreased.

D.C. Creates School As Part of its Males Of Color Initiative



District of Columbia Public Schools is slated to open Washington’s first all-male college preparatory public high school for the 2016-2017 school year.

The new school is part of a \$20 million “Empowering Males of Color” initiative aimed at improving the educational outcomes of young men of color. Although the single-gender school is designed to aid minority students, it is open to all young men regardless of race.

“While some of our male students in DCPS have seen improvements in their academic performance,” says D.C. Schools Chancellor Kaya Henderson in a press release, “too many African American and Latino males continue to lag far behind their white counterparts. This is not acceptable. Research shows, and I am convinced, this new school model will help to improve academic, social and emotional outcomes for young men...”

The campus, which has not been officially named, will open with 150 ninth-grade students in the inaugural class and build each year until it reaches grades 9-12 in 2020. The academic program will focus on reading, writing and languages such as Spanish and Latin. Also, emphasis will be placed on math and technology proficiency along with college and career readiness.

The district recently announced that first-time principal Benjamin Williams will lead the campus. Equipped with three degrees from the University of Virginia, his doctoral dissertation focused on the underrepresentation of African Americans in advanced placement courses. Williams began his professional career as a high school social studies teacher in Charlottesville, Va.

Cleveland Academy Prepares Educators to Become Principals

The Cleveland Metropolitan School District trains and tests some of its prospective principals for a year before giving them a chance to run a school building of their own.

Vetting occurs through the Aspiring Principals Academy, which is in its second school year. The district developed the program with guidance from the NYC Leadership Academy, which was founded 13 years ago in New York City and now works with clients in 26 states.

The Cleveland district accepts 10 candidates annually from a nationwide pool of applicants and assigns each to serve alongside a mentor principal.

The residents take on all the challenges of the job and could assume primary responsibility in various areas of school leadership. They are paid \$75,000 a year plus benefits, but must agree to stay with the district for five years.

The academy's objective is twofold: groom new principals for the rugged challenges of school-turnaround work and land leaders who are passionate and committed to the cause.

"The best training comes with real-world, hands-on learning experiences," said Heather Grant, who is in charge of new-principal support for the district. "Reading relevant texts, having group discussions and completing real, school-based projects are valuable, and we do that as well. But it's coupled with a yearlong, hands-on paid residency with weekly professional development. I don't know what's better than that."

Cleveland's academy begins with a five-week boot camp, or "summer intensive," and those who have gone through the experience say intensive is an apt description. The aspiring principals face simulated situations in a fictional school based on the academic and demographic makeup of a real Cleveland school building.



Aspiring principal Caitlin Kilbane chats with students during a classroom observation at Cleveland's Nathan Hale School.

Boot Camp Experience

Twyla West, who previously worked as a special-education teacher in northern Virginia, is spending her residency at Patrick Henry, an East Side elementary school targeted for turnaround support under *The Cleveland Plan*, the city's state-approved blueprint for education reform.

She and the other residents were just settling in at the boot camp when volunteers posing as frustrated parents suddenly confronted them. The exchange let her know quickly that it can be tough at the top.

"I always had someone who had my back as a teacher," she said. "In this situation, I was on my own."

Kathryn Francis, who was in the first cohort, advanced so quickly that midway through her residency she was appointed assistant principal at Orchard School of Science, a school for preschool through eighth grade on Cleveland's West Side.

She continued to join the class at weekly meetings. There the group reflected on principal practice, conducted teacher observations and learned how to navigate a school system of nearly 39,000 students and 100 schools.

Feedback came relentlessly – from Grant, from Francis' mentor, from her

peers, and from NYCLA representatives.

Francis, who is now principal at Orchard, said constantly hearing about "what didn't work" was draining but worth every minute. She stepped into the job ready to draft a budget, make a schedule and handle any number of other tasks.

"Looking back, it was the best decision I have made in my career," she said. "Everything was a very real and authentic learning experience that I could transfer into this job."

The program is aligned to 12 clearly articulated leadership standards. Grant, the mentors and others evaluate the residents for personal behavior, resilience, communication, problem solving, accountability and other attributes.

Serving the residency does not guarantee a job -- the residents must interview for open positions.

But the odds are good – six of the first class's 10 members are now principals and two are assistant principals. Two others didn't finish.

Seven women and three men were chosen for the academy this year. Three candidates already worked for the Cleveland school system, while the others came from the outside, including applicants from Arizona, California, Illinois, South Carolina and Virginia.

District Chief Executive Officer Eric Gordon gave them a warm welcome as the boot camp geared up in June. Yet, he made it clear that expectations run high in a district that believes school reform begins with building principals.

"You have got to be great for my kids," he said.

Applications are being accepted until April 8 for the 2016-17 Aspiring Principals Academy. For more information or to apply, click here <http://clevelandmetroschools.org/Page/3293>.



Departing Honor

Michael Casserly, left, executive director of the Council of the Great City Schools, honors U.S. Secretary of Education Arne Duncan in December before he stepped down from his post of seven years. Looking on are Council Chair Richard Carranza, superintendent of San Francisco public schools, and Secretary-Treasurer Kaya Henderson, chancellor of District of Columbia Public Schools, at Duncan's office.

College Board Names School Districts To Advanced Placement Honor Roll

In the last decade, Denver Public Schools has more than tripled the number of students getting passing scores of three or higher on Advanced Placement (AP) exams, with the number increasing from 853 in 2005 to 3,025 students in 2015. And in Alaska's Anchorage School District, from 2013 to 2015, there has been a 27.3 percent increase in the number of AP exams taken by students and a 28.6 percent increase in the number of AP exams taken where a score of 3 or higher is achieved.

Because of these achievements, these two urban school districts are among the 425 school districts in the United States and Canada that have been honored by the College Board with placement on the 6th Annual AP District Honor Roll. Districts

made the honor roll for increasing access to AP coursework while simultaneously maintaining or increasing the percentage of students earning passing scores of three or higher on AP exams.

In addition to Denver and Anchorage, big-city school districts represented by the Council of the Great City Schools that made the honor roll were California's Fresno Unified School District, Miami-Dade County Schools, Chicago Public Schools, Minneapolis Public Schools and Nevada's Clark County School District in Las Vegas.

Denver, Miami-Dade, Chicago and Clark County were also recognized for making the honor roll for multiple years.

Des Moines, Baltimore Districts Partner With Universities

Two big-city school districts are joining forces with local universities to give their students a leg up and improve their science, technology, engineering and math (STEM) skills.

Iowa's Des Moines Public Schools has partnered with Iowa State University in a program aimed to better equip elementary students for STEM instruction.

The Trinet pilot project brings 10 teams of ISU student teachers and graduate engineering students into elementary school classrooms, where they work with teachers in providing more meaningful engineering lessons. The program is funded by a \$4.5-million, five-year National Science Foundation grant.

At Des Moines' Downtown School, a Ph.D. student in mechanical engineering visits a classroom once a week, working alongside an elementary education student and a 4th-5th grade teacher. The Trinet project has been working with students during the fall semester to enhance their understanding of the engineering design process with a focus on the scientific concepts of magnetism and electricity.

Jennifer Mann, a 17-year veteran teacher at the Downtown School, believes she has been challenged and enriched by her participation with Trinet. "I feel like I've grown more this semester than ever before," said Mann in a Des Moines district blog. "Jordan, our grad engineering student, has been wonderful in showing [student teacher] Mathew and I how to make complex design principles teachable to 9-10 year-olds and the kids are loving this instruction."

Baltimore City Public Schools is also partnering with a local university, the University of Maryland, Baltimore County (UMBC), as well as with the Northrop Grumman Foundation, to boost science, technology, engineering, arts and math

Partnerships *continued on page 12*



Council of the Great City Schools

ANNUAL LEGISLATIVE/POLICY CONFERENCE

March 19-22, 2016

The Mayflower Hotel • Washington, DC



Saturday, March 19

- Conference Registration
- Fall Conference Planning Meeting
- Blue Ribbon Corporate Advisory Group Meeting
- Discussion on State Policy Issues
- The "ABC's" of Federal Education Policy
- Meeting of Legislative & Federal Program Liaisons
- Executive Committee Meeting
- Task Force Meetings
- New Members & New Attendees Orientation
- Welcome Reception at National Geographic Museum

Sunday, March 20

- Conference Registration
- Breakfast Buffet
- Board of Directors Meeting
- Great City Colleges of Education Meeting
- Luncheon with Speaker: **Acting Education Secretary John King**
- Legislative Briefings
- "Taste of Miami" 60th Anniversary Reception

Monday, March 21

- Breakfast with Speaker
- Legislative Briefings
- Luncheon with Speaker
- Capitol Hill Visits
- Reception at The Mayflower Hotel

Tuesday, March 22

- Breakfast and Briefing
- Adjourn

Congress Approves Funding to Expand National Test For Urban Schools

Congress recently increased appropriations for the National Assessment Government Board (NAGB) to expand the number of urban school districts that want to volunteer for the Trial Urban District Assessment (TUDA).

Six urban districts would have the opportunity to join 21 big-city school systems that already have their students taking the



rigorous federal test, the National Assessment of Educational Progress (NAEP), con-

sidered *The Nation's Report Card*.

The new districts, which have not been determined yet, would participate in the 2017 Trial Urban District Assessment in reading and mathematics at grades 4 and 8.

"Urban school districts that volunteer to take the test demonstrate their continuing commitment to the nation's highest academic standards and reaffirm their determination to raise student performance," says Michael Casserly, executive director of the Council of the Great City Schools.

The idea for a trial urban NAEP originated in 2000, when the Council requested that the National Assessment Governing Board conduct a trial NAEP assessment for large urban school districts that wanted to participate. Congress first funded TUDA in 2002.

With the increase in congressional funding, the TUDA program will expand to 27 urban school districts. Six big-city school systems – Atlanta, Chicago, District of Columbia, Houston, Los Angeles and New York City – volunteered for the first-ever TUDA, participating in the 2002 NAEP in fourth- and eighth-grade reading and writing.

Every Student Succeeds Act - A Look at the Details

By Jeff Simering, Director of Legislation

After intense negotiations between the leadership of the House and Senate education committees, a bipartisan agreement on reauthorizing the federal Elementary and Secondary Education Act (ESEA) was adopted by a joint conference committee just before Thanksgiving; passed by both houses of Congress; and was signed into law by President Obama on December 10 as the *Every Student Succeeds Act* (ESSA).



Over the past month, local school officials and state agencies have been pouring over the details of the thousand-plus page text, and they are finding that claims of increased flexibility and reduced federal intrusiveness are sometimes dubious. In fact, readers of the new law will find that ESSA is even more prescriptive than *No Child Left Behind* (NCLB) in some places. Conversely, they are also finding that some new requirements are not as over-reaching as under NCLB or even under NCLB with waivers. The long and short of it is that while some of the interventions are not as prescriptive as NCLB, states and local school districts must still develop new program plans, design activities, and provide more detailed data under ESSA than currently required.

Under the ESSA banner, these new requirements are described as “federal parameters” or “federal guardrails,” yet they are no less mandatory. The expeditious passage of the new Act and its broad-based support overshadowed the problems that state and local officials are likely to face implementing the statute. School administrators are just beginning to understand the multiple responsibilities and actions required by the new legislation, including:

- More state and local plan requirements
- More federally-required accountability indicators
- More disaggregation of data on more student subgroups
- More rigid statewide English proficiency timelines and English learner entry and exit procedures
- Multiple categories of schools identified for school improvement plans and interventions
- More schools identified as under-performing than under current NCLB waivers
- Newly required school improvement plans for certain non-Title I schools without being able to use any of the local Title I formula allocation for these improvement activities
- More severe interventions over time for schools failing to “exit” their identified improvement category

ESSA’s multiple levels of identification and intervention in low-performing schools are reminiscent of the NCLB accountability system, and include an LEA (local educational agency) improvement category as well. How the new state accountability systems are designed; how state goals and interim measures are structured; what multiple indicators are introduced; and how the mandated school improvement categories are defined by the state will determine whether the new Act is more or less workable than the previous ESEA with waivers. Unfortunately, state departments of education could easily replace the federal government as the prime culprit in over-regulating the new Act -- a prospect that demands vigilance by local school officials.

To be sure, the House-Senate conference committee’s decision not to make radical changes in the financial architecture of ESEA—such as adopting the Title I portability proposal or altering the Title I formula—obscured other provisions that will redirect federal ESEA funding towards private school services and charter schools. Some of these provisions were mitigated during the legislative process, but the end result under ESSA will be a greater share of federal funding spent on these schools.

In addition, the new law expands the state set-aside of funds under Title I and Title II in a way that may leave some school districts with reduced federal formula funding. The local hold-harmless protection under the current Title I law has also been deleted for school year 2017-2018 in order to allow states to maximize the benefit of the increased state Title I set-aside—despite the prospect of lower school district allocations. While most (95 percent) of the state school-improvement set-aside will be awarded ultimately for local comprehensive or targeted improvement projects, the state will decide which school districts receive these funds and which do not—and in what amounts.

Moreover, ESEA program administrators will have to navigate dozens of references to “evidence-based” activities across the various titles of ESSA. The new definition of this term requires certain activities with ESSA funds to be justified based on various levels of evidence from experimental, quasi-experimental, and correlational studies, research-based rationales, and program-evaluation results. Some ESSA activities require a higher standard of evidence than others, while some activities

New Law continued on page 11

New Law continued from page 10

allow states to determine whether the evidence is reasonably available at the school level. School district research directors anticipate that this legislatively brokered definition may create a flurry of unproductive compliance efforts with minimal academic benefits.

So how did a bill designed to increase flexibility result in over one thousand pages of legislation? Like any federal legislation, the real constituency needed to pass a bill is a majority of the 535 senators and representatives comprising the United States Congress. Piecing together that majority often requires inserting specific programs, authorities, prohibitions, requirements, definitions, exclusions, and innumerable other provisions sought by various members of Congress in order to get their votes. Whether those provisions make operational sense for state and local school officials is less important than securing the support for passage.

Why, then, did the Council of the Great City Schools support--albeit with reservations--passage of ESSA -- a bill that is not as flexible or as unobtrusive as advertised? Primarily, the bill maintains the traditional focus of the Elementary and Secondary Education Act on closing achievement gaps and improving academic achievement of low-income, minority, and English learner students. And pragmatically, ESSA represents the most practical opportunity to replace the unworkable provisions of NCLB and the endless system of short-term NCLB waivers. Now it is in everyone's best interest to use the upcoming transition year to plan for the efficient implementation of the Every Student Succeeds Act in school year 2017-2018.

Sacramento District Launches Internet And Social Media Safety Program

In an effort to help students address challenges of the digital age, California's Sacramento City Unified School District is partnering with the Sacramento County District Attorney's Office and several law enforcement agencies to launch a new program.

The Internet, Social Media Awareness, Resources and Training (#iSMART) program educates youth about the dangers, risks and threats students may face through the Internet and social media.

#iSMART is an interactive presentation designed for children to be active participants in the learning process. A prosecutor and law enforcement officer will use visual storyboards depicting several scenarios, including cyberbullying, sexting, online strangers and stalkers and

gang activity online. Throughout the presentation, students are asked questions to get them thinking and talking about the consequences of what they post online and Internet dangers.

The program is aimed to help middle and high school students, with a parent component to educate and provide parents with tools and resources to help them protect their children.

"Kids are getting smart phones, iPads and social media accounts at younger and younger ages," said Jessica Wharton, Sacramento Schools bullying prevention specialist. "They are growing up online. But at the same time, many remain unaware of the dangers and risks of inappropriate or careless Internet use."

The first #iSmart presentations will be held in schools beginning in January.

Students in Greensboro, N.C., School Build 'Tiny' Houses for Possible Homeless Use

At Weaver Academy for Performing and Visual Arts and Advanced Technology in North Carolina's Guilford County Schools, students have combined carpentry with compassion to address homelessness in their area.

Building-trade students in teacher Tom Bader's carpentry class are applying their math skills to have a big impact with their first tiny house construction project. If the project stays on schedule, within two years this tiny house will become someone's home.

Bader, a teacher at Weaver Academy for 13 years, said he was introduced to the tiny-house concept through a local organization that is embracing tiny houses as a possible solution to homelessness.

"I thought that was a terrific idea," said Bader, in an article published in the *Greensboro News & Record*. "Building a tiny house would take less than half as much time as a full-size one. It also would require fewer materials."

Tiny houses can be as small as 100 square feet, but generally are considered to be smaller than 400 square feet. Bader estimates the tiny house will cost approximately \$10,000 compared to the minimum price for a full size house which is \$39,000.

Until now, students at Weaver Academy have constructed full-size homes, which take approximately four years to build. Students have built 11 houses through the district's academic program.



Greensboro building-trade students build a tiny house.



Council of the Great City Schools
 1301 Pennsylvania Avenue, NW
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2016 Council Conference Schedule

Chief Human Resources Officers Meeting	February 10-12, 2016	Las Vegas, NV
Legislative/Policy Conference	March 19-22, 2016	Washington, DC
Chief Operating Officers Conference	April 12-15, 2016	Charlotte, NC
Bilingual Directors Meeting	May 10-14, 2016	Anchorage, AK
Chief Information Officers, Curriculum & Research Directors' Joint Meeting	July 11-14, 2016	Palm Beach, FL
Public Relations Executives Meeting	July 15-17, 2016	Chicago, IL
Annual Fall Conference	October 19-23, 2016	Miami, FL
Chief Financial Officers Conference	November 2016	TBD

Partnerships *continued from page 8*

(STEAM) education at three schools.

The \$1.6-million partnership will fund the development of a state-of-the-art STEAM Center at Lakeland Elementary and Middle School.

The center will feature science labs, a digital video and sound studio, computer lab, parent resource room and community meeting space.

In addition, teachers will use the center to undergo professional development on topics such as project-based learning and integrating the arts.

The new initiative will also help expand UMBC's Choice Program to serve students at the Benjamin Franklin High School and Francis M. Wood Excel Academy, who are facing challenges at school and at home. The program's 24/7 wraparound services include monitoring and ensuring school attendance; providing transportation to and from school, home visits and family support services; classroom coaching and afterschool activities.

According to district and university officials, the Choice program has served more than 20,000 youth and their families.

FACT SHEET



Council of the Great City Schools • 1301 Pennsylvania Avenue, N.W., Suite 702 • Washington, D.C. 20004 • cgcs.org

The Council of the Great City Schools is the only national organization exclusively representing the needs of urban public schools. Composed of 70 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.

Total number of students served by Council member district schools: 7.3 million

Student enrollment characteristics:

- | | |
|------------------------------|---|
| 40% - Hispanic | 17% - English Language Learners |
| 29% - African American | 70% - Eligible for free/reduced price lunch |
| 20% - White | 14% - Students with Individualized Education Programs |
| 8% - Asian/Pacific Islander | |
| 1% - Alaskan/Native American | |

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

School districts eligible for membership must be located in cities with populations over 250,000 and student enrollments over 35,000. School districts located in the largest city of any state are also eligible for membership, regardless of size.

60TH ANNIVERSARY COUNCIL LOGO

**COUNCIL OF THE
GREAT CITY
SCHOOLS**



1956

2016

LEGISLATION

JOHN KING NOMINATION LETTER



MEMBER DISTRICTS

- Albuquerque
- Anchorage
- Arlington, TX
- Atlanta
- Austin
- Baltimore
- Birmingham
- Boston
- Bridgeport
- Broward County
- Buffalo
- Charleston County
- Charlotte-Mecklenburg
- Chicago
- Cincinnati
- Clark County
- Cleveland
- Columbus
- Dallas
- Dayton
- Denver
- Des Moines
- Detroit
- Duval County
- El Paso
- Fort Worth
- Fresno
- Guilford County
- Hillsborough County
- Honolulu
- Houston
- Indianapolis
- Jackson
- Jefferson County, KY
- Kansas City
- Long Beach
- Los Angeles
- Miami-Dade County
- Milwaukee
- Minneapolis
- Nashville
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- Newark
- Norfolk
- Oakland
- Oklahoma City
- Omaha
- Orange County, FL
- Palm Beach County
- Philadelphia
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- San Diego
- San Francisco
- Santa Ana
- Seattle
- Shelby County
- St. Louis
- St. Paul
- Toledo
- Tulsa
- Washington, D.C.
- Wichita

February 24, 2016

The Honorable Lamar Alexander
Chairman
Health, Education, Labor, and Pensions Committee
U.S. Senate
Washington, DC 20510

The Honorable Patty Murray
Ranking Member
Health, Education, Labor, and Pensions Committee
U.S. Senate
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, writes to express strong support for the nomination of Dr. John B. King, Jr. as United States Secretary of Education. The long overdue reauthorization of the Elementary and Secondary Education Act in Congress must now be implemented in states and school districts throughout the nation, and Dr. King has the experience needed to lead this work at the U.S. Department of Education.

Dr. King began serving in the U.S. Department of Education in January of 2015, and has been Acting Secretary of Education since the beginning of 2016. Most importantly, Dr. King served in a number of education positions at the local and state level prior to coming to Washington, starting as a high school classroom teacher. His subsequent roles in founding and managing local schools provided Acting Secretary King with unique experience leading urban public schools that are closing achievement gaps and preparing college and career-ready students. In 2011, Dr. King was appointed education commissioner for the State of New York, where he oversaw the elementary and secondary schools that serve over 3 million students, as well as the public, private, and proprietary colleges and universities in the state.

In his time at the U.S. Department of Education, both before and since becoming Acting Secretary, Dr. King has focused on improving educational outcomes for all students and closing achievement gaps. His priorities for expanding early learning, delivering high-quality instruction for poor and minority students, and providing special education, English language acquisition, and innovative services in schools aligns with the goals outlined by Congress in the new Every Student Succeeds Act.

The Council of the Great City Schools urges the Senate to confirm Dr. John B. King, Jr. as United States Secretary of Education.

Sincerely,

A handwritten signature in black ink that reads "Michael Casserly".

Michael Casserly
Executive Director

OCR GUIDANCE

U.S. Department of Education’s Office for Civil Rights Guidance: An Update

John W. Borkowski, Elizabeth S. Samples and Katie Jo Lunningham¹

For the last several years, the U.S. Department of Education Office for Civil Rights (“OCR”) has been aggressively enforcing federal civil rights laws in school districts across the country. After providing a brief background on OCR and the laws it enforces, this article describes OCR’s efforts to enforce such laws through guidance, enforcement, and transparency. It concludes with a brief discussion of what school districts can expect when OCR initiates an investigation.

Background

OCR enforces several federal civil rights statutes that prohibit discrimination on various bases in programs or activities that receive federal financial assistance. OCR has mandatory jurisdiction to enforce several federal civil rights statutes, including the following:

Title VI of the Civil Rights Act of 1964 (“Title VI”) ²	Prohibits discrimination on the basis of race, color, national origin
Title IX of the Education Amendments of 1972 (“Title IX”) ³	Prohibits discrimination on the basis of sex
Section 504 of the Rehabilitation Act of 1973 (“Section 504”) ⁴	Prohibits discrimination on the basis of disability
Title II of the Americans with Disabilities Act of 1990 (“ADA”) ⁵	Prohibits discrimination on the basis of disability

OCR both responds to complaints about alleged violations of these laws that may be submitted by individuals or groups and also conducts its own agency-initiated compliance reviews.

School districts are subject to these federal civil rights laws as a result of their acceptance of federal financial assistance, and the penalties for violations include the possible termination of such assistance. This threat looms large for school districts. The threat is so significant that OCR has rarely had to use it when investigating school districts for alleged violations. OCR often relies instead on agreements to resolve complaints and compliance reviews.

OCR is led by an Assistant Secretary of Education, and the person filling this position is appointed by the President and confirmed by the Senate. As a result, as political winds change, so do

¹ John W. Borkowski is a partner at Husch Blackwell LLP in Chicago, Illinois, Elizabeth S. Samples is a senior counsel in Husch Blackwell’s Kansas City office, and Katie Jo Lunningham is an associate in that office. All three are active members of the firm’s education practice. The views expressed in this article are those of the individual authors and not their firm. This article is not intended as legal advice.

² See 42 U.S.C. § 2000d et seq.

³ See 20 U.S.C. §§ 1681 et. seq. See also 34 C.F.R. § 106.1 et seq. (codified Department of Education regulations “to effectuate title IX of the Education Amendments of 1972”).

⁴ See 34 C.F.R. 104 et. seq. (regulations implementing Section 504 as related to educational institutions).

⁵ See 28 C.F.R. § 35.101 (“to effectuate subtitle A of Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12131), which prohibits discrimination on the basis of disability by public entities.”).

enforcement priorities. Under the Obama administration, OCR has aggressively utilized all of its enforcement tools: providing guidance, investigating, and increasing transparency.⁶

OCR Guidance

OCR provides technical guidance in a number of formats—from direct conversations with school districts to various forms of written guidance. Dear Colleague letters are OCR’s primary mode of communicating guidance. These letters often announce OCR’s interpretation of the civil rights laws and its views of compliance obligations. During the Obama administration, OCR has released a large number of such letters. Since 2010 OCR has issued:

- Eight Dear Colleague letters⁷ focused solely Title VI issues, covering topics such as voluntary consideration of race to avoid racial isolation in schools; avoiding immigration/citizenship status discrimination in the enrollment process; and school obligations to ensure meaningful participation of English Learner students.

On October 1, 2014, OCR issued a sweeping Dear Colleague letter addressing school districts’ legal obligation to provide all students with equal access to all types of educational resources without regard to race, color or national origin.⁸ This guidance was in addition to another lengthy Dear Colleague letter OCR released earlier that year addressing the discriminatory use of student discipline. In the letter, OCR set out a series of expectations on Title VI requirements relating to student discipline. The letter specifically addressed the issues of disciplining similarly situated students of different races differently and selectively enforcing school rules. The letter focused on the need for data collection—in particular, data on referrals, which the letter identified as a potential problem area for discrimination due to the often subjective and discretionary ability of faculty and staff to decide who and when to refer.

On January 7, 2015, OCR released a joint guidance Dear Colleague letter with the Civil Rights Division of the U.S. Department of Justice.⁹ Noting that both departments share authority for enforcing Title VI in education, the letter addressed schools’ obligations to (1) ensure that English Learner students can participate meaningfully and equally in school, and

⁶ Some educational organizations have complained about what they characterize as OCR’s heavy-handed approach, and have requested clarification of guidance documents articulating expansive enforcement standards. OCR has responded to these complaints, but has not substantially modified its positions.

⁷ This figure does not include guidance documents that cut across several of OCR’s areas of jurisdiction. Recent documents of this type include guidance concerning the prohibition against retaliation under federal civil rights laws, guidance about the application of civil rights laws to charter schools and juvenile justice residential facilities and guidance regarding student-on-student harassment on the basis of sex; race, color and national origin; and disability. The Dear Colleague letters not specifically addressed here can be found on the Department of Education’s website. See U.S. Department of Education, Office for Civil Rights, *Race and National Origin Discrimination Policy Guidance* (2016), available at <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/raceorigin.html>.

⁸ Catherine E. Lhamon, Assistant Sec’y for Civil Rights, “*Dear Colleague*” Letter: *Guidance to Ensure All Students Have Equal Access to Educational Resources*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Oct. 1, 2014), available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-resourcecomp-201410.pdf>.

⁹ “*Dear Colleague*” Letter: *Guidance to Ensure English Learner Students Have Equal Access to a High-Quality Education*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. & U.S. DEP’T OF JUSTICE, CIV. RTS. DIV. (Jan. 7, 2015), available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf>.

(2) communicate information to parents with limited English proficiency in a language they can understand. The 40-page letter identified and addressed ten Common Civil Rights Issues—including unnecessary segregation of English Learners (including in special programs for “newcomers”) and failing to adequately staff and support English Learner programs.¹⁰ In keeping with the Department’s efforts to make guidance accessible, the letter also provided a Notice of Language Assistance page providing information for English Learners to request language assistance services.¹¹ In addition to the letter, the Department provided fact sheets and a toolkit to help school districts identify English learner students. The fact sheets were published in English, Arabic, Cambodian, Chinese (simplified and traditional), Hmong, Korean, Laotian, Russian, Spanish, Tagalog, and Vietnamese,¹² while the toolkit contained a Home Language Survey sheet asking questions in English, Spanish, French, Vietnamese, Chinese, Amharic, and Arabic.¹³

- Six Dear Colleague letters exclusively addressing a variety of Title IX topics such as sexual violence, pregnant and parenting students, the obligations of Title IX Coordinators, volunteer youth service organizations, and compliance with Title IX’s regulatory requirement to accommodate students’ athletic interests and abilities.¹⁴ In addition to the Dear Colleague letters, OCR also issued Questions and Answers on Title IX and Single-Sex Elementary and Secondary Classes and Extracurricular Activities¹⁵ and a more than 50-page Question and Answer document clarifying its Title IX sexual violence guidance.¹⁶

With regards to Title IX, sexual harassment and sexual violence are attracting a great deal of attention at OCR and in the national media. OCR has made clear that much of its sexual harassment and sexual violence guidance also applies at the K-12 level. The Dear Colleague letter on sexual violence discusses school districts’ obligations to investigate all instances of sexual violence, including off-campus incidents in certain cases.¹⁷ The letter also instructs that in some cases, a school must investigate an alleged violation even in cases where a parent or student’s withholds consent to participate in the investigation.

¹⁰ *Id.* at 8-39.

¹¹ *Id.* at 3.

¹² U.S. Department of Education, Office for Civil Rights & U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. & U.S. DEP’T OF JUSTICE, CIV. RTS. DIV. *School’s Civil Rights Obligations to English Learner Students and Limited English Proficient Parents* (January 7, 2015), available at <http://www2.ed.gov/about/offices/list/ocr/ellresources.html>.

¹³ U.S. Department of Education, Office for Civil Rights & U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. & U.S. DEP’T OF JUSTICE, CIV. RTS. DIV., *Tools and Resources for Identifying All English Learners 6-8* (January 7, 2015), available at: <http://www2.ed.gov/about/offices/list/oela/english-learner-toolkit/chap1.pdf>.

¹⁴ The Dear Colleague letters not specifically addressed here can be found on the Department of Education’s website. See U.S. Department of Education, Office for Civil Rights, *Sex Discrimination Policy Guidance* (2016), available at <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/sex.html>.

¹⁵ Catherine E. Lhamon, Assistant Sec’y for Civil Rights, *Questions and Answers on Title IX and Single-Sex Elementary and Secondary Classes and Extracurricular Activities*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Dec. 1, 2014), available at <http://www2.ed.gov/about/offices/list/ocr/docs/faqs-title-ix-single-sex-201412.pdf>.

¹⁶ Catherine E. Lhamon, Assistant Sec’y for Civil Rights, *Questions and Answers on Title IX and Sexual Violence*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Apr. 29, 2014), available at <http://www2.ed.gov/about/offices/list/ocr/docs/qa-201404-title-ix.pdf>.

¹⁷ Catherine E. Lhamon, Assistant Sec’y for Civil Rights, *“Dear Colleague” Letter: Guidance on Addressing Sexual Harassment/Sexual Violence*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Apr. 4, 2014), available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf>.

Notably, an April 2015 Dear Colleague letter addressed the obligation of schools to designate a Title IX Coordinator. The letter also highlighted the responsibility of schools to ensure that Title IX Coordinators are properly trained and informed about their responsibilities under Title IX. The letter was accompanied by a letter to Title IX Coordinators and resource guide to assist Title IX Coordinators in their work.¹⁸

- Five Dear Colleague letters focused primarily on Section 504 and ADA issues.¹⁹ These letters dealt with addressing the need for educational technology to be accessible; effective communication for students with hearing, vision, or speech disabilities; FAQs regarding the Americans with Disabilities Act Amendments Act of 2008 and the broadened definition of “disability;” access to extracurricular activities and sports; and disability-based bullying and harassment.²⁰

In January 2013, OCR released a Dear Colleague letter addressing extracurricular activities. The letter explained that school districts must make reasonable modifications and provide the relevant aids and services needed to ensure equal opportunity, unless doing so would constitute a fundamental alteration of the sport or activity.²¹ The letter also suggested that when the interests and abilities of students with disabilities cannot be satisfied by a district’s existing extracurricular athletic program, the district should consider creating additional opportunities for such students. After outside groups questioned OCR’s expansive view and requested clarification, an OCR official responded by saying that school districts are encouraged but not *required* to create additional extracurricular opportunities for students with disabilities, and the standard OCR will use to evaluate district efforts is not the Title IX standard, which would call for evaluation of whether the needs of students with disabilities can be met as “fully and effectively” with the existing program.

On October 21, 2014, OCR issued a Dear Colleague letter echoing themes that had been raised in a letter from the Office for Special Education and Rehabilitative Services (“OSERS”) in 2013 and OCR’s bullying letter in 2010.²² OCR noted that bullying of a student with disabilities on *any* basis can result in a denial of “Free Appropriate Public Education” (“FAPE”), which must be remedied.

In some instances, OCR’s Dear Colleague letters outline more robust compliance obligations than courts have required in civil liability cases. School districts should consult with their attorneys to

¹⁸ Catherine E. Lhamon, Assistant Sec’y for Civil Rights, “*Dear Colleague*” Letter: *Guidance on Obligation of Schools to Designate a Title IX Coordinator*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Apr. 24, 2015), available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201504-title-ix-coordinators.pdf>.

¹⁹ The Dear Colleague letters not specifically addressed here can be found on the Department of Education’s website. See U.S. Department of Education, Office for Civil Rights, *Disability Discrimination Policy Guidance* (2016), available at <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/disability.html>.

²⁰ This figure does not include Fact Sheets published regarding protecting civil rights while addressing the risk of measles and Ebola in schools.

²¹ Catherine E. Lhamon, Assistant Sec’y for Civil Rights, “*Dear Colleague*” Letter: *Guidance on Schools’ Obligation to Provide Equal Opportunity to Students with Disabilities to Participate in Extracurricular Athletics*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Jan. 25, 2013), available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201301-504.html>.

²² Catherine E. Lhamon, Assistant Sec’y for Civil Rights, “*Dear Colleague*” Letter: *Guidance on Bullying of Students with Disabilities*, U.S. DEP’T OF EDUC., OFF. FOR CIV. RTS. (Oct. 21, 2014), available at <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/disability.html>.

discuss how to approach their civil rights compliance obligations. Although complying with OCR standards may avoid OCR scrutiny and mitigate risk more generally, it is important for districts to understand what steps outlined by OCR are legally required and which are aspirational.

OCR Investigations: Complaints and Compliance Reviews

As noted above, there are two main types of OCR investigations, those arising from (1) complaints, and (2) compliance reviews. Under both approaches, when OCR discovers violations it typically seeks to enter into a resolution agreement with a school district, requiring the district to take corrective actions.

Under the complaint process, OCR considers and may investigate all complaints filed by anyone. The complainant need not be a victim of alleged discrimination or even have any connection to the district. However, OCR will generally limit investigations to those that are filed within 180 days of the last act of discrimination, unless the time for filing is extended by the responsible OCR official.

Unlike complaints, OCR itself initiates compliance reviews. A compliance review involves proactive, broad-scale, district-wide investigations of strategic significance to OCR. History suggests that media stories and a school district's various data reporting obligations, in conjunction with OCR's enforcement priorities at the time, may trigger a compliance review. Recent experience suggests OCR currently is focusing on, among other priorities, sexual violence, equity in athletics, college and career readiness, and discipline. In some cases alleging Title IV discrimination in discipline, OCR is currently expanding investigations of single complaints into district-wide inquiries that resemble compliance reviews.

When an OCR investigation of either variety uncovers noncompliance—including noncompliance with OCR's interpretation of federal civil rights laws as outlined in statutes, regulations, Dear Colleague letters and other guidance—OCR typically seeks to enter into a resolution agreement. Resolution agreements are essentially settlement agreements or consent decrees in which a school district undertakes enumerated steps to remedy the harmful effects of past noncompliance and to achieve compliance. Though ostensibly voluntary, the threat of loss of federal financial assistance often results in districts agreeing to sometimes onerous requirements. Some of these requirements include: individual remedies, such as compensatory education or revisions to student academic or discipline records, hiring a consultant to advise on strategies for the equitable administration of discipline, developing and administering climate surveys covering various issues, making electronic information technology accessible to individuals with disabilities, and, often, revisions to policies and procedures and staff training.

Transparency

OCR has recently announced an increase in transparency. For example, it has expanded and publicized its Civil Rights Data Collection ("CRDC") results, and has begun to publish its resolution agreements on its website. OCR also released a revised Case Processing Manual in February 2015, which outlines OCR's procedures when evaluating, investigating and resolving complaints and compliance reviews.

Although publishing resolution agreements is self-explanatory, the CRDC is not. The CRDC is a mandatory, biennial survey through which OCR collects civil rights data directly from at least a

representative sample of school districts for each administration (although some districts are always included, for example, large districts – and the most recent data collection was universal). OCR released the latest data (from the 2011–12 CRDC) in March 2014. OCR analyzes the data to identify concerns and trends and, as noted above, to identify districts for compliance reviews. However, when it first released the data in March 2014, OCR also invited crowdsourcing, posting the data in a user-friendly format and encouraging stakeholders to analyze it.

In April 2015, OCR received approval from the Office of Management and Budget (“OMB”) to require every public school and school district in the country to respond to the 2013-14 CRDC. The OMB also approved an additional set of new data items as optional for the 2013-14 CRDC, and mandatory for the 2015-16 CRDC. Because schools are now required to collect and submit CRDC data, districts would be well-advised to spend time reviewing their own CRDC data to identify any areas of concern.

When OCR Knocks at the Door: Some things to Consider

First and foremost, school districts should ensure appropriate processes are available for individuals to make discrimination complaints internally. School districts should do this both because it is required and because it may result in mutually beneficial resolution internally. By having appropriate processes in place, internal resolutions may eliminate the need for an external complaint and investigation. Sometimes, districts fall out of compliance simply by failing to properly utilize the processes they have in place. The simplest way to avoid a potential issue with OCR is to have the required processes in place; to ensure those processes are effectively communicated to members of the school community; and to follow those processes when complaints arise.

In addition, school districts can put themselves in the best position in terms of civil rights compliance, if they remain familiar with OCR guidance and are regularly conduct internal self-assessments. Best practice would be to create an audit calendar that builds in designated internal or external compliance assessments regularly throughout the year. Such self-assessments can allow districts to take appropriate corrective actions without burdensome investigations and without the public controversy that can be generated by civil rights complaints.

However, school districts also must be prepared for the chance that OCR receives a complaint or initiates a compliance review. When this happens, the district first should take measures to preserve relevant documents and to prepare for large document/information requests on relatively tight, though often negotiable, timelines. Consistent and clear record-keeping practices regarding internal complaints, discipline, and students with disabilities, to name a few, will make this task easier. If an investigation is complaint-driven, OCR typically refuses to provide the school district with a copy of the complaint but describes the allegations in general terms. OCR investigations also often include one or more visits by OCR representatives to interview witnesses and stakeholders.

As OCR begins to gather the information necessary for it to assess a school district’s compliance, the district should attempt to keep ahead of the investigation by conducting an internal investigation of its own. Only after a school district has closely examined its own level of compliance can the district take steps to remedy any defects or determine what type of resolution is most desirable. Once an internal investigation is completed, the district can then take interim steps designed to address areas of noncompliance as needed. This knowledge may also provide school districts with an opportunity to initiate or enter into OCR-initiated resolution agreements from a position of relative

strength. Indeed, in some instances, the school district itself may want to consider proposing a resolution agreement to OCR.

Throughout the investigation and resolution periods, districts also should consider how to manage communication with their communities and the media about the various issues that may arise during an investigation. Although some school districts have found public support for defying OCR, the vast majority of public attention has been critical of schools under investigation. In order to mitigate the potential negative publicity of an OCR investigation, school districts who cooperate can sincerely tout their efforts to work closely with OCR to ensure compliance with the law.

At the end of the day, public school districts and OCR have the same goal: making sure that all students have unimpeded access to a high quality education. Approaching OCR guidance documents, investigations and data reporting with that principle in mind often is the best way to work cooperatively with OCR and to avoid protracted controversies. Indeed, for some school districts, OCR investigations have been handled in a way that refines, promotes and enhances existing educational improvement initiatives that were already under way. In those situations, both the school districts and OCR bolster their mutual pursuit of educational equity.

UNITED STATES VS. TEXAS

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA, *et al.*,
Petitioners,

v.

STATE OF TEXAS, *et al.*,
Respondents.

On Writ of Certiorari to the United States
Court of Appeals for the Fifth Circuit

**BRIEF OF EDUCATORS AND CHILDREN'S ADVOCATES
AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS**

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SUMMARY OF ARGUMENT

The Court of Appeals upheld a nationwide preliminary injunction preventing implementation of the DAPA² and expanded DACA³ programs. These programs would have provided security from removal

² A person is eligible under the DAPA program if he/she (1) had a U.S. citizen or lawful permanent resident son or daughter as of November 20, 2014; (2) had resided continuously in the United States since before 2010; (3) was physically present in the United States on November 20, 2014 (and when making the DAPA request); (4) had no lawful immigration status on November 20, 2014; and (5) does not fall within an enforcement priority or otherwise present a factor making DAPA inappropriate. *See* Dep't of Homeland Sec. Memorandum at 4 (Nov. 20, 2014), Dkt. No. 38, Ex. 7 (Dec. 24, 2014).

³ The expanded DACA program lifted certain age and date restrictions from the government's existing program of making deferred action available to young people who were brought to the United States as children. *See id.*

for millions of parents of U.S. citizen and lawful permanent resident (LPR) children (under the DAPA program), as well as individuals who came to the United States as children (under the expanded DACA program). In enjoining these programs, the courts below failed to assess the harm to the public interest that these programs were designed to mitigate – and that the injunction therefore perpetuates.

Most importantly, the courts failed to consider the harms to U.S. citizen and LPR children that would result from the injunction of the DAPA program. When implemented, DAPA would have removed the threat of deportation for parents of millions of U.S. citizen and LPR children. Due to the nationwide injunction, these parents will continue to face the threat of removal, and their children will face the prospect of being separated from their parents, entering the child welfare system, or being forced to leave their U.S. homeland for a country that is not their own.

As detailed below, children whose parents face removal from the United States are more likely to suffer a host of harms, particularly to their development, educational opportunities, economic stability, and psychosocial well-being. The DAPA program directly addresses these serious harms to U.S. citizen and LPR children by alleviating the risk of removal temporarily. The lower courts failed to consider that the government's decision to adopt these programs was in the best interests of these U.S. citizen and LPR children. The courts also failed to adequately

account for the benefits of work authorization for the eligible population and the enhanced educational opportunities that expanded DACA would facilitate.

In short, lifting the injunction would benefit millions of U.S. citizen and LPR children by providing them with the family stability and security that is essential in supporting their healthy development, educational attainment, emotional well-being, and economic stability. It would also advance important educational opportunities for the DACA-eligible population.

ARGUMENT

I. Humanitarian Concerns Are An Important Consideration Under The Immigration Laws

The Immigration and Nationality Act (INA) requires that special attention be paid to the interests of children, and to the promotion of family stability among U.S. citizens and their undocumented family members. As this Court has explained, “[t]he legislative history of the [INA] clearly indicates that the Congress intended to provide for a liberal treatment of children and was concerned with the problem of keeping families of United States citizens and immigrants united.” *INS v. Errico*, 385 U.S. 214, 220 n.9 (1966) (quoting H.R. Rep. No. 85-1199, at 7 (1957)). Reflecting this legislative purpose, the INA gives discretion to the Attorney General to, for example, cancel removal for certain nonpermanent resident aliens who show that their removal would pose

significant difficulty for their U.S. citizen or LPR children, *see* 8 U.S.C. § 1229b(b)(1); it also places no limits on the number of immigrant visas available for parents of U.S. citizens at least 21 years old, *see id.* § 1151(b)(2)(A)(i).

Indeed, this Court has long recognized that the government may consider these humanitarian concerns when exercising its discretion concerning how to enforce the nation’s immigration laws. *See, e.g., Arizona v. United States*, 132 S. Ct. 2492, 2499 (2012) (“Discretion in the enforcement of immigration law embraces immediate human concerns.”); *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 483-84 (1999) (describing government’s “regular practice” of granting “deferred action” for “humanitarian reasons”). Here, the deferred action programs announced by the government would serve the INA-recognized goals of ensuring the unity and stability of families that include U.S. citizens and LPRs. The importance of these programs is all the more pronounced because U.S. citizen and LPR children will be key beneficiaries of the relief provided by them.

II. The Courts Did Not Consider The Harms To U.S. Citizen And LPR Children Before Enjoining DAPA

An estimated four million children under 18 years old reside in households with potentially DAPA-

eligible parents.⁴ The injunction leaves this DAPA-eligible population at material risk of removal, and that risk of removal causes substantial and irreversible harm not only to the potential beneficiaries of DAPA, but particularly to their U.S. citizen and LPR children. *See Weinberger v. Romero-Barcelo*, 456 U.S. 305, 312 (1982) (citation omitted) (explaining that a preliminary injunction should be denied where it “adversely affect[s] a public interest for whose impairment, even temporarily, an injunction bond cannot compensate”). This harm to U.S. citizen and LPR children is an important factor supporting the government’s exercise of its discretion to target the parents of these children with its exercise of prosecutorial discretion. Permitting that harm to continue is manifestly contrary to the public interest. *See Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 23-26 (2008) (explaining that reversal of a preliminary injunction may be warranted on “[the public interest] factors alone” when the court below “significantly understate[s] the burden” on the public interest).

The courts below failed to consider the impact of the injunction on the individuals affected by it, and particularly the benefits to U.S. citizen and LPR children that would result from the DAPA program. In

⁴ More than 80% of these children are U.S. citizens. *See* Randy Capps et al., Migration Policy Institute, *Deferred Action for Unauthorized Immigrant Parents: Analysis of DAPA’s Potential Effects on Families and Children* (Feb. 2016), <http://www.migrationpolicy.org/sites/default/files/publications/DAPA-Profile-FINALWEB.pdf>.

dismissing such considerations, the District Court concluded there was “no reason to believe” DAPA-eligible parents would be removed if the injunction were granted, and that, in fact, the affected individuals would be better off if an injunction were granted, because the programs might later be reversed. *Texas v. United States*, 86 F. Supp. 3d 591, 676 (S.D. Tex. 2015). For its part, the Court of Appeals did not mention the potential harm to children in its public interest analysis. Respectfully, these decisions should now be reversed.

A. The DAPA Eligible Population Faces A Substantial Risk Of Deportation

Parents of U.S. citizen and LPR children face a significant risk of removal. In an approximately two-year period between 2010 and 2012, the United States Immigration and Customs Enforcement (ICE) removed 204,810 immigrants who said they had one or more U.S.-born children.⁵ In 2013 and 2014, ICE removed 111,710 immigrants who had one or more U.S.-born children.⁶ Further, the record before the District Court

⁵ Seth Freed Wessler, *Primary Data: Deportations of Parents of U.S. Citizen Kids*, Colorlines (Dec. 17, 2012) (ICE statistics obtained through Freedom of Information Act request), http://colorlines.com/archives/2012/12/deportations_of_parents_of_us-born_citizens_122012.html.

⁶ See U.S. Dep’t of Homeland Sec., ICE, *Deportation of Aliens Claiming U.S.-Born Children: First Semi-Annual, Calendar Year 2013*, at 4 (Apr. 28, 2014), <http://big.assets.huffingtonpost.com/2013-report1.pdf> (reporting 39,410 removals of parents of U.S. citizens

reflected that, without DAPA, the federal government could not assure that the eligible population would be safe from removal.⁷

More recently, news reports suggest that,

in first half of 2013); U.S. Dep't of Homeland Sec., ICE, *Deportation of Aliens Claiming U.S.-Born Children: Second Half, Calendar Year 2013 Report to Congress*, at 4 (Apr. 28, 2014), <http://big.assets.huffingtonpost.com/2013report2.pdf> (reporting 33,000 removals of parents of U.S. citizens in second half of 2013); Perla Trevizo, *Fewer Parents of US-Citizen Kids Being Deported*, Arizona Daily Star (Jan. 2, 2016), http://tucson.com/news/fewer-parents-of-u-s--citizen-kids-being-deported/article_e45be3ba-b66e-5017-ab9c-9e0905b35c87.html (reporting 39,300 removals in 2014). While these statistics do not correlate precisely with the continuing removal of DAPA-eligible parents (which encompasses parents of both U.S. citizen and LPR children, disqualifies certain parents on other grounds, and depends upon the federal government's discretion), they support the conclusion that U.S. citizen and LPR children remain at material risk of harm from the deportation of their parents.

⁷ See Policies for the Apprehension, Detention and Removal of Undocumented Immigrants at 5 (Nov. 20, 2014), Dkt. No. 38, Ex. 5 (Dec. 24, 2014) (expressly *permitting* the removal of non-priority immigrants, such as DAPA-eligible parents, and noting that memorandum is not intended “to prohibit or discourage the apprehension, detention, or removal of aliens unlawfully in the United States who are not identified as priorities herein”); Transcript of Oral Argument at Preliminary Injunction Hearing at 42, Dkt. No. 106 (Jan. 20, 2015) (noting that new deferred action programs intended to preserve resources that would otherwise be expended in pursuing removal); *accord* Decl. of Karl Eschbach, Ph.D ¶ 17 (Jan. 6, 2015), Dkt. No. 64, Ex. 14 (Jan. 7, 2015) (declaration of Plaintiff's expert affirming that, without DAPA, parents “would otherwise have been identified by [DHS] and subject to deportation”).

following the District Court's injunction, DAPA-eligible parents continue to be deported or otherwise subject to actions that increase their likelihood of deportation.⁸ In sum, parents of U.S. citizen and LPR children remain at risk of deportation.

B. The Deportation Of DAPA-Eligible Parents Leaves Families With A Horrible Dilemma For Their Children: Parental Abandonment Or Leaving Their Home Country

When parents are deported, entire families are affected. Families face the harsh dilemma of either keeping children behind without parental support or

⁸ Lomi Kriel, *Qualified Immigrants Still Face Threat of Deportation*, Houston Chronicle (Mar. 10, 2015), <http://houstonchronical.com/news/houston-texas/houston/article/Qualified-immigrants-still-face-threat-of-6122712.php> (reporting on ICE's deportation, after the injunction, of father of three U.S. citizen children, who had previously been told he could be eligible for DAPA and would be released); Brianna Lee, *Immigration Reform: Authorities No Longer Shielding DAPA-Eligible Immigrants from Deportation Cases*, Int'l Bus. Times (Feb. 27, 2015), <http://ibtimes.com/immigration-reform-authorities-no-longer-shielding-dapa-eligible-immigrants-1831310> (reporting on threatened deportation of father of four U.S. citizen children); Roque Planas, *DAPA-Eligible Immigrants Face Threat of Deportation, Advocates Say*, Huffington Post (Feb. 27, 2015), http://huffingtonpost.com/2015/02/27/dapa-deportation-immigrants_n_6764890.html (reporting that ICE required undocumented mother of two U.S. citizen children, who would apparently be eligible for DAPA, to install an ankle monitor, a signal of potential removal).

having children leave with their parents to a foreign and unknown country. Either option visits harm on U.S. citizen and LPR children.

The first option results in substantial and well-recognized psychosocial harms that accompany forced parental abandonment. Research shows that children who have not seen a parent for one month after the parent's arrest experience more frequent changes in sleeping habits, anger, and withdrawing from family compared to children who have seen their parents within a month after arrest.⁹ Children who have had a parent detained or deported also experience increased occurrences of post-traumatic stress disorder, depression, and anxiety.¹⁰

⁹ Ajay Chaudry et al., The Urban Institute, *Facing Our Future: Children in the Aftermath of Immigration Enforcement*, at 43 (Feb. 2, 2010), <http://www.urban.org/publications/412020.html>.

¹⁰ In one reported example, a mother described the effects on her three U.S. citizen children after the deportation of their father: "Our four year-old son misses his dad and is going through a depression. Our thirteen year-old daughter's grades are going down, and I'm going to have to close our business. When you deport one person . . . you leave behind three broken hearts." Maria Perez, *My Husband Was Deported*, The Hill (Mar. 24, 2014), <http://thehill.com/blogs/congress-blog/foreign-policy/201388-my-husband-was-deported>; *see also* Heather Koball et al., Urban Institute & Migration Policy Institute, *Health and Social Service Needs of US-Citizen Children with Detained or Deported Immigrant Parents*, at 5 (Sept. 2015), <http://www.migrationpolicy.org/research/health-and-social-service-needs-us-citizen-children-detained-or-deported-immigrant-parents>; Chaudry et al., *supra* note 9.

Deportation and detention procedures can also cause the remaining parent to suffer from depression, social isolation, and economic instability, all of which can exacerbate the negative effects experienced by children.¹¹ High levels of stress in mothers, both prenatally and during the child's earliest years of life, interrupt a child's healthy development.¹² The impact of untreated maternal depression is widely documented as interrupting young children's healthy cognitive, social-emotional, and behavioral development, the effects of which can last throughout a child's life, impacting brain architecture and causing persistent disruptions of stress response systems.¹³

Parental detention or deportation also has a significant financial impact on families, many of whom already live below the federal poverty level. The sudden loss of parental income results in housing and

¹¹ Koball et al., *supra* note 10, at 5-6.

¹² See Marilyn J. Essex et al., *Epigenetic Vestiges of Early Developmental Adversity: Childhood Stress Exposure and DNA Methylation in Adolescence*, 84 *Child Dev.* 58 (2014), <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3235257/pdf/nihms313621.pdf>; Tess Lefmann & Terri Combs-Orme, *Prenatal Stress, Poverty, and Child Outcomes*, 31 *Child & Adolescent Soc. Work J.* 577 (2014).

¹³ National Scientific Council on the Developing Child, *Maternal Depression Can Undermine the Development of Young Children* (Center on the Developing Child at Harvard University, Working Paper No. 8, Dec. 2009), <http://developingchild.harvard.edu/wp-content/uploads/2009/05/Maternal-Depression-Can-Undermine-Development.pdf>.

food insecurity and increased risk of entering the child welfare system, all of which are predictors of poor social and educational outcomes for children later in life.¹⁴ When a child of a detained or deported parent becomes involved with the child welfare system, the child faces significant barriers to reunifying with his or her parents, resulting in longer stays in foster care and sometimes permanent separation.¹⁵ In addition, mothers often report having difficulty taking care of their children and finding paid work to make up for the father's lost income.¹⁶ The loss of a father's earnings on average results in a decrease of \$24,000 or 73 percent of a family's income.¹⁷ These financial stresses often are

¹⁴ Perez, *supra* note 10; Koball et al., *supra* note 10, at 5; Chaudry et al., *supra* note 9; Katherine Kortenkamp & Jennifer Ehrle, The Urban Institute, *The Well-Being of Children Involved with the Child Welfare System: A National Overview* (Jan. 2002), http://www.urban.org/research/publication/well-being-children-involved-child-welfare-system/view/full_report.

¹⁵ Koball et al., *supra* note 10, at 8; Seth Freed Wessler, *Shattered Families: The Perilous Intersection of Immigration Enforcement and the Child Welfare* (Nov. 2011), <https://www.raceforward.org/research/reports/shattered-families> Applied_Research_Center---Shattered_Families.pdf.

¹⁶ For example, one mother in South Florida who was working when her spouse was deported said she had to choose between working double shifts and caring for her children at night – if she chose to stay home, then she could not afford necessities such as shoes or soap. See Koball et al., *supra* note 10, at 8.

¹⁷ Capps et al., *supra* note 4, at 2.

compounded by the costs associated with deportation proceedings, including hiring lawyers.¹⁸

The removal of parents can also interrupt or curtail children's educations. For example, following the District Court's injunction, two teenage brothers in Georgia, Alex and Jonathan, witnessed the deportation of their father. Their father had no criminal convictions and should have been eligible for DAPA prior to the injunction, as Jonathan is a U.S. citizen. Because their father is diabetic, their mother will return to Mexico to care for him. The brothers will remain in the United States without their parents so they can continue to attend high school. Jonathan had planned to attend college next year, but without parental support, he now plans to look for work instead.¹⁹ As this example illustrates, the loss of support and stability visited upon U.S. citizen and LPR children when their parents are deported is a critical harm that the DAPA program alleviates.

The second option effectively visits the penalty of removal on U.S. citizen and LPR children. When their parents are forcibly removed from the United States, U.S. citizen and LPR children can leave the United States with their parents, rather than face

¹⁸ See Koball et al., *supra* note 10, at 8.

¹⁹ See Elly Yu, *As Courts Fight Over Immigration, Georgia Family Faces Father's Deportation*, WABE, Atlanta's NPR Station (Mar. 18, 2015), <http://wabe.org/post/courts-fight-over-immigration-georgia-family-faces-fathers-deportation>.

abandonment by remaining in the United States. Apart from being forced to leave their home country – the United States – U.S. citizen and LPR children who accompany their deported parents often have difficulty integrating to a new one, and face limited access to education and health care, as well as difficulties integrating due to language and cultural barriers.²⁰

As a result of the injunction, an estimated four million U.S. citizen and LPR children – whose parents would have been eligible for deferral from removal under DAPA – remain at risk of harm from this horrible dilemma.²¹

C. The Threat Of Removal Facing Parents Causes U.S. Citizen And LPR Children To Endure Emotional, Psychological, And Educational Harm

Beyond the harm inflicted by removal itself, children whose parents face threatened removal also suffer significant harms. Children whose parents are at risk of deportation are more likely to suffer emotional and psychological harm linked to the fear of losing a

²⁰ Victoria Kline, Instituto para las Mujeres en la Migracion, A.C. (IMUMI), *Where Do We Go From Here? Challenges Facing Transnational Migrant Families Between the US and Mexico*, at 55 (Oct. 2013), http://uf.imumi.org/recursos/where_challenges.pdf.

²¹ Mem. Op. for the Secretary of Homeland Sec. and the Counsel to the President at 30 (Nov. 19, 2014), Dkt. No. 38, Ex. 2 (Dec. 24, 2014) (estimating that approximately four million parents would be eligible for DAPA).

loved one, and these negative effects are particularly striking for young children. The interactions between children and their parents during the infant and toddler years, particularly through consistent relationships and adequate social supports, are essential inputs for future learning, behavior, and health.²² Disruption of that relationship can be highly stressful for and damaging to children. Indeed, it is well-established that “toxic stress” experienced by young children causes a physiological response that leads to negative long-term consequences.²³ For example, Mexican-origin children with undocumented mothers are more likely to exhibit a variety of social and behavioral issues, including anxiety, depression, and low self-esteem, when

²² National Research Council & Institute of Medicine, *From Neurons to Neighborhoods: The Science of Early Childhood Development*, at 225-26 (Jack P. Shonkoff & Deborah A. Phillips eds., 2000), <http://www.nap.edu/read/9824/chapter/13>.

²³ Toxic stress in early childhood, defined as “the excessive or prolonged activation of the physiologic stress response systems in the absence of the buffering protection afforded by stable, responsive relationships,” has been found to influence brain patterns with devastating consequences later in life, including substance abuse, school failures, financial hardship, poor health, and inadequate coping mechanisms. See American Academy of Pediatrics, *Early Childhood Adversity, Toxic Stress, and the Role of the Pediatrician: Translating Developmental Science into Lifelong Health*, 129 *Pediatrics* e224-25 (2012), <http://pediatrics.aapublications.org/content/pediatrics/129/1/e224.full.pdf>; Jack P. Shonkoff et al., *The Lifelong Effects of Early Childhood Adversity and Toxic Stress*, 129 *Pediatrics* 232 (2012), <http://pediatrics.aapublications.org/content/pediatrics/early/2011/12/21/peds.2011-2663.full.pdf>.

compared to Mexican-origin children whose parents have legal status.²⁴ These traits correlate with worse educational and social outcomes for children later in life, including poor school performance and greater risk of substance abuse.²⁵ Negative effects of parental undocumented status can occur even in very young children with consequential effects. Experiences during a child's earliest years profoundly affect brain development – impacting a child's cognitive, linguistic, social, and emotional abilities – and build a healthy foundation for life.²⁶ As a result, the negative effects of parental undocumented status may be observed at a very young age: as early as age two, children of

²⁴ Nancy S. Landale et al., *Behavioral Functioning Among Mexican-origin Children: Does Parental Legal Status Matter?*, 56 *J. Health & Soc. Behav.* 2-18 (2015), <http://www.asanet.org/journals/JHSB/Mar15JHSBFeature.pdf>.

²⁵ Mark A. Leach et al., US2010 Project, *Unauthorized Immigrant Parents: Do Their Migration Histories Limit Their Children's Education?*, at 13 (Oct. 2011), <http://www.s4.brown.edu/us2010/Data/Report/report101811.pdf> (finding that the undocumented status of a child's mother typically reduces that child's schooling by one and a quarter years); Kalina Brabeck et al., *The Psychosocial Impact of Detention and Deportation on U.S. Migrant Children and Families: A Report for the Inter-American Human Rights Court*, at 5-6 (Aug. 2013), <https://www.bc.edu/content/dam/files/centers/humanrights/doc/IACHR%20Report%20on%20Psychosocial%20Impact%20of%20Detention%20%20Deportation-FINAL%208-16-13.pdf> (finding that parental legal vulnerability to deportation is linked to their children's emotional well-being and academic performance).

²⁶ See *From Neurons to Neighborhoods*, *supra* note 22.

undocumented parents are more likely to have lower cognitive skills than comparable children in families with immigration status.²⁷ These effects continue throughout childhood. For example, U.S. citizen children between the ages of seven and ten with undocumented parents systematically perform lower in math, reading, and spelling compared to children whose immigrant parents had legal status.²⁸ These harms directly follow from the uncertainty experienced by children living with the constant threat of their parent's deportation.

In addition, children living with undocumented parents are more likely to grow up in poverty, without health care, and with limited English proficiency.²⁹ Poverty is a strong predictor of children's success in

²⁷ Hirokazu Yoshikawa, *Immigrants Raising Citizens: Undocumented Parents and Their Young Children* (2012).

²⁸ Kalina M. Brabeck et al., *The Influence of Immigrant Parent Legal Status on U.S.-Born Children's Academic Abilities*, Applied Developmental Sci. (Dec. 21, 2015).

²⁹ *Id.* at 2. The average annual income for undocumented workers is \$22,029, placing a family of four relying on an undocumented worker's wage under the poverty level. See Report of the Executive Office of the President of the United States, *The Economic Effects of Administrative Action on Immigration*, at 14 (Nov. 2014) Dkt. No. 38, Ex. 20 (Dec. 24, 2014). One study estimated that 36% of families with DAPA-eligible parents live in poverty. Capps et al., *supra* note 4, at 10.

school and their health outcomes.³⁰ Children growing up in poverty experience poorer health, higher incidence of developmental delays and learning disabilities, and more hunger compared to their peers.³¹

Although there are many causes of the heavy burden placed on the children of undocumented parents, several are critical here. Undocumented parents are more likely to hold jobs with poor working conditions and high risk environments, including longer hours, lower wages, and less access to employer benefits, leading to less time and resources available for their children. Further, undocumented parents may be cautious about social interactions or allowing their children to participate in extracurricular or recreational programs for fear of exposing their status, resulting in more limited social connections that could otherwise help child-rearing and development. Finally, undocumented parents are often afraid to interact with the government, so their U.S. citizen children may not benefit from public programs for which they are

³⁰ Lawrence Aber et al., Society for Research in Child Development, *Children, Families and Poverty: Definitions, Trends, Emerging Science and Implications for Policy*, at 4 (2012), http://www.nasbo.org/sites/default/files/SPR_26%233_FINAL%20%281%29.pdf.

³¹ *Id.* at 4, 20, 23.

eligible, such as early childhood enrichment, health care, and nutrition programs.³²

Together, the consequences visited on U.S. citizen and LPR children of undocumented parents at risk of deportation lead to an unmistakable result: these children risk becoming something less than full members of society. These harms threaten children's attainment of a basic education and undermine their long-term prospects for self-actualization and educational and economic success.³³ In sum, denying a secure place in our society for U.S. citizen and LPR children of undocumented parents imposes a "lifetime hardship on a discrete class of children not accountable for their disabling status." *Plyler v. Doe*, 457 U.S. 202, 223 (1982).

D. DAPA Would Have Alleviated These Harms

In addition to evidence that children of undocumented parents suffer a multitude of harms, there is also evidence of the positive effect of the now-enjoined programs. Within the first month after the issuance of the Johnson Memorandum in November

³² Annette Bernhardt et al., *All Work and No Pay: Violations of Employment and Labor Laws in Chicago, Los Angeles, and New York City*, 91 Soc. Forces 725 (2013).

³³ Am. Psychol. Ass'n, *Crossroads: The Psychology of Immigration in the New Century*, Report of the APA Presidential Task Force on Immigration (2012), <http://www.apa.org/topics/immigration-report.pdf>.

2014, family members released from detention were reunited with their children.³⁴ Testimonials suggest that feelings of anxiety were ameliorated in the expectation that parents could soon come out of the shadows – only to have the anxiety not only return, but intensify, after the injunction was issued.³⁵

More generally, studies have consistently concluded that providing legal recognition to parents significantly mitigates children’s harms and improves their overall well-being, including educational outcomes.³⁶ In addition, work authorization can be

³⁴ Erica Pearson, *Millions of Undocumented Immigrants in Limbo During Court Battle over Deferred Action for Parental Accountability*, N.Y. Daily News (Mar. 20, 2015), <http://www.nydailynews.com/new-york/ruling-blocking-deferred-action-program-hurts-immigrants-article-1.2152878> (describing release and reunification of DAPA-eligible father with five-year-old son after issuance of Johnson Memorandum, following ten months in ICE custody).

³⁵ Hansi Lo Wang, *Immigrants Worry They’ll Face Deportation After Deferred Action Delay*, NPR (Mar. 4, 2015), <http://www.npr.org/2015/03/04/390475592/immigrants-worry-they-ll-face-deportation-after-deferred-action-delay> (reporting that parent of five-year-old U.S. citizen son who had lived in U.S. for ten years was detained by ICE in 2014 but released after DHS issued the Johnson Memorandum; he “cried tears of joy to be with [his] son again, to be able to hug him and kiss him and play with him”).

³⁶ Frank D. Bean et al., *Mexican Immigrant Political and Economic Incorporation*, 4 *Persp. on Pol.* 309, 311 (2006), http://www.ime.gob.mx/investigaciones/2006/estudios/APSA-Identidad-migrantes_mexicanos.pdf (reporting that 52% of survey respondents whose father became a U.S. citizen and 43% of

expected to increase parents' wages by 6% to 10%,³⁷ resulting in higher incomes that directly correlate to improved educational success for U.S. citizen and LPR children.³⁸ Indeed, children raised in higher-income families are far more likely to finish high school,³⁹ attend and graduate from college,⁴⁰ and achieve success

respondents whose father became a LPR received a college degree or some college education compared to 14% of children of undocumented fathers).

³⁷ See *The Economic Effects of Administrative Action on Immigration*, *supra* note 29, at 20; see also Manuel Pastor & Enrico A. Marcelli, Center for Study of Immigrant Integration, University of Southern California, *What's at Stake for the State: Undocumented Californians, Immigration Reform, and Our Future Together*, at 13 (May 2013), http://dornsife.usc.edu/assets/sites/731/docs/whats_at_stake_for_the_state.pdf (reporting that percentage of non-citizen immigrants with income above 150% of the poverty level jumps from 47% to 68% when an undocumented immigrant becomes documented); Capps et al., *supra* note 4.

³⁸ Sean F. Reardon, *The Widening Academic Achievement Gap Between the Rich and the Poor: New Evidence and Possible Explanations, in Whither Opportunity? Rising Inequality, Schools, and Children's Life Chances* 91 (Greg J. Duncan & Richard J. Murnane eds., 2011) (reporting that the "socioeconomic status of a child's parents has always been one of the strongest predictors of the child's academic achievement and educational attainment").

³⁹ Susan E. Mayer, *Revisiting an Old Question: How Much Does Parental Income Affect Child Outcomes?*, 27 *Focus* 21 (2010), <http://irp.wisc.edu/publications/focus/pdfs/foc272e.pdf> (reporting that low-income children are more likely to drop out of high school than more well-off children).

⁴⁰ In 2013, only 45.5% of low-income students who completed high school in the previous year were enrolled in college, as compared

while doing so.⁴¹ Children whose parents are eligible for work also benefit from non-monetary benefits afforded by their parents, including greater access to their parents' employer-sponsored health coverage.⁴²

By reinstating the threat of deportation and

to 63.8% of middle-income students and 78.5% of high-income students. National Center for Education Statistics, *Percentage of Recent High School Completers Enrolled in 2-Year and 4-Year Colleges, by Income Level: 1975 through 2013*, http://nces.ed.gov/programs/digest/d14/tables/dt14_302.30.asp. Even when controlling for academic performance, a family's low socioeconomic status impacts children's subsequent educational outcomes. Joydeep Roy, Economic Policy Institute, *Low Income Hinders College Attendance for Even the Highest Achieving Students* (Oct. 12, 2005), http://www.epi.org/publication/webfeatures_snapshots_20051012/ (showing that only 29% of low-income, high-performing eighth grade students went on to earn a bachelor's degree, as compared to 74% of high-income, high-performing eighth graders).

⁴¹ Gordon Dahl & Lance Lochner, *The Impact of Family Income on Child Achievement: Evidence from the Earned Income Tax Credit* at 2 (National Bureau of Economic Research, Working Paper 14599 Dec. 2008), <http://www.nber.org/papers/w14599> (reporting that \$1,000 increase in parental income raised children's math and reading scores by 6% of a standard deviation).

⁴² Laurel Lucia et al., UC Berkeley Center for Labor Research and Education and UCLA Center for Health Policy Research, *Health Insurance and Demographics of California Immigrants Eligible for Deferred Action*, at 3 (Mar. 2015), <http://healthpolicy.ucla.edu/publications/Documents/PDF/2015/immigrants-policy-brief-mar2015.pdf> (reporting that DAPA will increase access to private health insurance based on 21% increase in health coverage for DACA grantees).

keeping working parents in the shadows, the injunction renewed and exacerbated a state of psychological stress and economic deprivation that restricts educational outcomes for more than four million U.S. citizen and LPR children of DAPA-eligible parents. Because mere months are critical to children's development, particularly during their earliest years, withholding the advantages of the program works significant harm on U.S. citizen and LPR children nationwide. Under these conditions, the "balance of [irreparable] harm weighs heavily on the side of the children." *Certain Named & Unnamed Non-Citizen Children & Their Parents v. Texas*, 448 U.S. 1327, 1333-34 (1980) (placing significant weight on harms to children flowing from denial of an education, including "emotional and behavioral problems").

III. The Courts Failed To Weigh The Public Interest In Enhancing Educational Opportunities Before Enjoining Expanded DACA

In issuing and upholding the injunction, the courts below also did not consider the substantial benefits of the enhanced educational opportunities for long-time U.S. residents under expanded DACA.

The preliminary injunction prevents an estimated 290,000 people who arrived in this country as children from applying for DACA. This delay works a substantial harm on this population because it deprives them of immediate access to educational opportunities, internships, and career and vocational training

programs available to DACA recipients. The public interest favors access to educational opportunities for young people who have been educated in U.S. elementary and secondary schools and “know only this country as a home.”⁴³

In some states, DACA recipients qualify for higher education benefits for which other undocumented students do not. For example, in two states, DACA recipients may enroll in public colleges and universities, but other undocumented students may not.⁴⁴ At least six states have determined that students granted DACA can establish state residency for tuition purposes under their existing rules,⁴⁵ significantly increasing the chances those students will complete high school and attend college.⁴⁶ The long-term

⁴³ Complaint, Dkt. No. 1, Ex. C at 1 (Dec. 3, 2014).

⁴⁴ United We Dream, *Tuition Equity for Undocumented Students and DACA Grantees: Access by State* (Feb. 2014), http://www.unitwedream.org/wp-content/uploads/2014/05/deep_education_map.pdf.

⁴⁵ States as diverse as Alabama, Maryland, Massachusetts, Ohio, New Hampshire, and Virginia have determined that students granted DACA can establish state residency for tuition purposes under their existing rules. *See id.* And at least 18 states, including Texas, have elected to provide in-state tuition rates to all students who meet certain criteria, regardless of their status. *See* National Conference of State Legislatures, *Undocumented Student Tuition: Overview* (Oct. 29, 2015), <http://www.ncsl.org/research/education/undocumented-student-tuition-overview.aspx>.

⁴⁶ *See, e.g.*, Stephanie Potochnick, *How States Can Reduce the Dropout Rate for Undocumented Immigrant Youth: The Effects of*

economic benefits to recipients of a college education are substantial.⁴⁷

In addition, DACA recipients are eligible for federal work authorization documents, which significantly improves their chances of obtaining new jobs and increasing their earnings.⁴⁸ Increased wages

In-State Resident Tuition Policies, at 25, paper presented at the Population Association of America Conference (Apr. 2011), <http://paa2011.princeton.edu/papers/110491> (finding that adoption of in-state tuition rates reduces overall dropout rate by 7% and by 16% among Mexican, foreign-born non-citizens).

⁴⁷ Jennifer C. Day & Eric C. Newburger, U.S. Census Bureau, *The Big Payoff: Educational Attainment and Synthetic Estimates of Work-Life Earnings*, at 4 (July 2002), <https://www.census.gov/prod/2002pubs/p23-210.pdf> (reporting that, over a 40-year full-time work life, individuals with a bachelor's degree earn on average a cumulative total of \$2.1 million, more than double what a high school dropout earns); National Center for Education Statistics, *The Condition of Education 2009* at 40 (June 2009), <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2009081> (reporting median earnings of \$45,000 for people between ages 25 and 34 with a bachelor's degree but only \$29,000 for those with a high school diploma or equivalent).

⁴⁸ DACA has increased recipients' wages by more than 240% on average. Raul Hinojosa-Ojeda, North American Integration & Development Center, *From the Shadows to the Mainstream: Estimating the Economic Impact of Presidential Administrative Action and Comprehensive Immigration Reform* at 2 (Nov. 20, 2014), Dkt. No. 38, Ex. 21 (Dec. 24, 2014); see also Roberto G. Gonzales et al., *Becoming DACAmented: Assessing the Short-Term Benefits of Deferred Action for Childhood Arrivals*, 58 Am. Behav. Scientist 1852 (2014), <http://abs.sagepub.com/content/early/2014/10/01/0002764214550288.abstract> (reporting

significantly expand the opportunity to pursue an education for any population – but especially so for a population that continues to lack access to federal financial aid and in-state tuition in many states.⁴⁹

The injunction of expanded DACA delays implementation of a policy that has proven to result in further educational attainment. DACA is unique among immigration policies because it makes educational attainment a condition for eligibility. Eligible applicants must have a high school diploma or its equivalent or be enrolled in school, including K-12 education, adult education, literacy, or career-training programs. Thus, in the most straightforward sense, DACA’s expansion encourages more individuals to remain in or return to school in order to qualify for the program, improving rates of educational attainment

that 59% of recent DACA recipients obtained a new job and 45% increased their earnings); Caitlin Patler & Jorge A. Cabrera, Institute for Research on Labor and Employment, *From Undocumented to DACAmented* at 5 (June 2015), http://www.irle.ucla.edu/publications/documents/Patler_DACA_Report_061515.pdf (finding that 65% of surveyed DACA recipients in California reported that their household’s overall economic situation had improved after receiving DACA).

⁴⁹ The Advisory Committee on Student Financial Assistance: Report to Congress and the Secretary of Education, *The Rising Price of Inequality: How Inadequate Grant Aid Limits College Access and Persistence* at 23 (June 2010), http://chronicle.com/items/biz/pdf/acsfa_rpi.pdf (finding that only 58% of students who were “very concerned” about finances enrolled in a four-year college compared to 84% of students who were not concerned about finances).

among the eligible population.⁵⁰ For example, Tonya, an Arizona teenager, had dropped out of high school prior to DACA, after her parents' unsteady immigration experience and eventual return to Mexico left her feeling discouraged. The announcement of DACA gave Tonya an incentive to successfully complete her GED, which, in turn, has enabled her to enroll in a medical assistance training program.⁵¹ Tonya's story illustrates another benefit of DACA, namely, DACA recipients are more likely to invest in additional education or vocational training because of the increased certainty in their ability to remain in the United States.⁵²

DACA not only encourages enrollment in educational institutions, but also enhances the opportunities available to students once enrolled. For example, after receiving DACA, Jessica, a student at a private university in South Carolina, finally had the

⁵⁰ Approximately 426,000 individuals met all requirements for the initial DACA program except for the educational requirement, and countless more would have been similarly encouraged to pursue educational attainment for deferred action if not for the injunction. Hinojosa-Ojeda, *supra* note 48, at 3.

⁵¹ Roberto G. Gonzales et al., American Immigration Council, *DACA at Year Three: Challenges and Opportunities in Accessing Higher Education and Employment* at 10 (Feb. 2016), http://immigrationpolicy.org/sites/default/files/docs/daca_at_year_three.pdf.

⁵² *The Economic Effects of Administrative Action on Immigration*, *supra* note 29, at 6.

identification required to volunteer at a hospital, apply for an internship at a medical school, and take the MCAT, putting her on the path to fulfill her dream of becoming a doctor in an underserved community.⁵³

Because enhanced educational attainment confers substantial economic benefits on both expanded DACA recipients and states and communities as a whole, the harm from the injunction of expanded DACA should have been considered by the courts below.⁵⁴ For example, the State of Texas has itself recognized the benefits of providing expanded access to education to the eligible population. In enacting legislation providing in-state tuition to all Texas residents, the State recognized that “every dollar invested in our state’s higher education system pumps more than five dollars into our Texas economy” and “higher levels of education correlate to higher median earnings, lower unemployment, and lower poverty

⁵³ Gonzales et al., *supra* note 51, at 12-13.

⁵⁴ Because DACA and DAPA recipients receive only a temporary reprieve from deportation, have no path to citizenship, and remain ineligible for federal student financial aid and in-state college tuition in the majority of states, *Amici* contend that deferred action, while overwhelmingly in the public interest, does not adequately address the needs of undocumented youth and school-age children whose parents are undocumented. *Amici* continue to advocate for legislative action on immigration to holistically address the needs of students and children.

rates.”⁵⁵ Other respondent states have at least implicitly recognized the benefits of expending state resources to provide higher education to undocumented students.⁵⁶ Of the respondent states, Texas has the most to gain from expanded deferred action, with nearly 500,000 eligible residents.⁵⁷ Other states similarly stand to gain substantial economic benefits from undocumented students’ enhanced access to education.⁵⁸ These benefits were not adequately considered by the courts below.

⁵⁵ Texas House Research Organization, Bill Analysis of HB 1403 at 4 (Apr. 18, 2001), <http://www.hro.house.state.tx.us/pdf/ba77r/hb1403.pdf>.

⁵⁶ For example, the state legislatures of Florida, Kansas, Nebraska, and Utah have each enacted laws providing for in-state tuition for certain undocumented students. *See* Gilberto Mendoza, *Tuition Benefits for Immigrants*, National Conference of State Legislatures (July 15, 2015), <http://www.ncsl.org/research/immigration/tuition-benefits-for-immigrants.aspx>.

⁵⁷ Decl. of Joe Peters, ¶ 6, Dkt. No. 64, Ex. 24 (Jan. 7, 2015).

⁵⁸ *See, e.g.*, Thomas P. DiNapoli & Kenneth B. Bleiwas, New York State Comptroller, *The New York State DREAM Act* at 4, Report 1-2014 (May 2013), <https://www.osc.state.ny.us/osdc/rpt1-2014.pdf> (reporting that increased college attendance of undocumented students would be mitigated by economic benefits, including \$60,000 in additional state tax revenue for each new person earning a bachelor’s degree); News Release, Massachusetts Taxpayers Foundation, *Massachusetts Public Colleges Would Gain Millions of Dollars from Undocumented Immigrants* (Jan. 5, 2006), <http://www.masstaxpayers.org/sites/masstaxpayers.org/files/MTF%20Undocumented%20Immigrant%20Education%20News%20Release.pdf>.

CONCLUSION

For the reasons stated above, *Amici* urge this Court to reverse the judgment below.

Respectfully submitted,

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APPENDIX

APPENDIX: LIST OF *AMICI CURIAE*

Advocates for Children and Youth
American Academy of Pediatrics
American Association of Community Colleges
American Federation of Teachers
Association of Latino Administrators and
Superintendents
BUILD Initiative
California Latino School Boards Association
California Pan-Ethnic Health Network
Center for Law and Social Policy
The Child Care Law Center
Child Welfare League of America
Children Now
Children's Defense Fund
Children's HealthWatch
The Children's Partnership
Coalition on Human Needs
Columbia Law School Immigrants' Rights Clinic
Council of the Great City Schools
Dartmouth College
DePaul University
Desis Rising Up & Moving (DRUM)
East Bay College Fund
Educators for Fair Consideration
First Focus
Franklin & Marshall College
Freedom University
GLSEN
Greater Rochester Coalition for Immigration Justice
Haverford College

Hispanic Association of Colleges and Universities
Kids for College, Greater Rochester Coalition for
Immigration Justice
Long Beach City College
Los Angeles Unified School District
MANA, A National Latina Organization
Mason DREAMers
MEChA of University of Portland
Mt. San Antonio College
National Alliance of Black School Educators
National Association for Bilingual Education
National Association for Chicana and Chicano Studies
National Association for the Education of Young
Children
National Association of Social Workers
National Education Association
National Health Law Program
National Hispanic Medical Association
National Migrant and Seasonal Head Start Association
National Organization for Women
National Women's Law Center
Oakton Community College
Padres & Jóvenes Unidos
Pomona College
The Renew Group
Rutgers University - Newark
San Diego Dream Team
Sargent Shriver National Center on Poverty Law
The Scholarship Foundation of St. Louis
ScholarshipsA-Z
St. Joseph's College
Stand for Children - Nashville
Student Advocacy Center of Michigan

Student U
TeachDream NYC
TESOL International Association
TheDREAM.US
Trinity Washington University
True Colors Fund
U-Lead Athens
United States Hispanic Leadership Institute
United States Student Association
University of San Francisco
Village Leadership Academy
Voices for Children in Nebraska
Voices for Utah Children
Washington Dream Coalition
Williamette University Child & Family Advocacy
Clinic
Young Center for Immigrant Children's Rights at the
University of Chicago

RESEARCH

RESEARCH DEPARTMENT OVERVIEW



Research Department Overview

March 2016

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 following reports and presentations will be available on our Research Department webpage: <http://www.cgcs.org/Research>.

Update on New Projects

Analysis of TUDA Performance

In this study, we will examine the academic performance of the 21 urban districts that participate in the Trial Urban District Assessment (TUDA) of the National Assessment of Education Progress (NAEP). These districts participate in reading and mathematics assessments in grades 4 and 8. We would like to examine the changes in student performance, using student level regression analysis, in these districts from 2011 to 2013. Our analyses will focus on the following questions:
How did each district perform in 2013—

- compared to the national public sample and the large city populations?
- compared to one another when we control for relevant student background characteristics?
- compared to their expected performance based on relevant student background characteristics?
- across mathematics and reading subscales?
- How did each district's performance change from 2011 to 2013?

Methods and Data Analysis District Performance in 2013

In order to describe the performance of the 21 districts on NAEP grade 4 and 8 reading and mathematics, we will report their average scores and associated standard errors. Next, we will compare the average score of each district to the national public school sample and the large city (LC) averages. We will conduct pairwise comparisons to test whether district means were significantly different from the national and LC averages. As the number of comparisons conducted at the same significance level increases, it becomes more likely that at least one of the estimated differences will be significant merely by chance. To control for multiple comparisons, these analyses will be conducted using the Benjamini-Hochberg (1995) false discovery rate (FDR) procedure. In addition,

we will compare the performance of each district against the other districts after adjusting for certain student background characteristics. We will conduct regression analyses to estimate the performance of a district if its demographic profile, in terms of the selected student background characteristics, is the same as the average profile of all 21 districts. These analyses will put the districts on a more level playing field with regard to these characteristics. Based on this regression analyses (using student level data), we will compute the expected performance of each district based on their profile in terms of the selected student background characteristics.

Next, we will compare each district's actual performance to the expected performance for that district. We call the difference between the two the "district effect."

We will examine the changes in district performance from 2011 to 2013 for the districts that participated in both assessments. We will look at the changes both at the composite and subscale levels. We will report if the changes were statistically significant. We will test if these changes are significantly different from the changes observed in the national public samples and the LC populations for the same period. We will also compute the effect size corresponding to the change in average scores observed from 2011 to 2013. The effect size is computed as the ratio of the change in average scores to the standard deviation of the corresponding scale in 2011 for the national public school sample.

Analysis of Office of Civil Rights (OCR) Finance Data

The Research Team requested the restricted school level data set from the Office of Civil Rights for the 2009-10 and 2011-12 school years. An analysis of financial data was replicated from a previous study to demonstrate the impact of proposed comparability changes. Local level personnel spending was compared between Title 1 and Non-Title 1 schools to evaluate funds shortages.

Survey of Districts on Supporting the Implementation of the Common Core

This survey serves two purposes. The first guides the future work of the Council of the Great City Schools and Student Achievement Partners in gearing our work to support the most utilized instructional materials in urban districts. We are asking about adopted materials in literacy and in mathematics, and whether districts plan to keep those materials or adopt new ones in the near future.

The Council also will develop a framework districts can use to evaluate the quality and usefulness of their own curriculum guidance documents. The results of this survey will be used in the designing of that tool.

Student testing in America's Great City Schools: An Inventory and Preliminary Analysis

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.

Purpose

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 conducted a comprehensive survey of member school districts regarding their planned assessment practices for the 2014-2015 academic year.

Update:

The study was published in October 2015. The Council will not augment this study by convening a panel of national assessment experts to recommend a more coherent testing and assessment system for districts and states.

Secondary National Assessment of Educational Progress (NAEP) Analysis

Overview

In an effort to provide additional guidance to Council districts as they begin to implement the Common Core State Standards, staff conducted secondary analyses of NAEP data. This analysis was broken down in two parts. First, our team compared the performance of large cities (LC), national public schools (NP), and national private schools by various student groups on 2002 through 2015 NAEP results. This analysis was unique as it analyzes performance within student groups rather than comparing all students in districts and jurisdictions. Second, the research team conducted an analysis of Charter vs. non-Charter schools and their student performance from 2005 to 2015. The analyses focused on the national public sample and the large city sample? Again, this analysis compared the two school types within student demographic background characteristics of race and free or reduced price lunch status.

Update:

The results of both analyses are now available as research briefs.

Update on On-Going Projects

Males of Color 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.

In July 2014, the Council joined President Barack Obama’s “My Brother’s Keeper” initiative to address opportunity gaps faced by boys and young men of color. Sixty-one Council districts have signed *A Pledge by America’s Great City Schools* to ensure that pre-school, elementary, middle, and high school educational efforts better serve the academic and social development of Males of Color.

Update

The Council has developed a set of Key Performance Indicators to measure the progress among the Council’s membership toward improving the academic outcomes for Males of Color. These indicators are part of the ongoing Academic Key Performance Indicator project and include the following:

- Percent of pre-K students and percent of pre-K students who advance to kindergarten
- Third grade reading proficiency
- Ninth grade algebra completion
- Ninth graders failing one or more core courses
- Ninth graders with a GPA of B or better
- Number of high school students enrolled in advanced placement
- AP exam scores of 3 or higher
- Number of high school students enrolled in AP-equivalent courses
- Four-year high school graduation rate
- Five-year high school graduation rate
- Percent of students with 20 days or more absent from school
- Instructional days per student missed per year due to suspension
- Percent of students identified as needing special education
- Percent of students placed in each general education setting by percent of time

Partnerships. The Council has explored the expansion of partnerships with various organizations across the country to support the implementation of member district pledges to support Males. This fall, the Council partnered with the College Board to identify and reach out to young men of color who have demonstrated the potential to succeed in AP classes. This spring, the Council partnered with the National Basketball Association (NBA), the NBA Players Association, and the NBA Retired Players Association to begin supporting efforts in districts to support young men of color in NBA cities.

Website. In January 2016, the Council launched a website dedicated to the Males of Color initiative. The purpose of the website is to build an online community of school district and national partners to improve the academic and social outcomes of Males of

Color. The website highlights school district initiatives, the latest news, and the Council's data reports and resources focused on Males of Color. Moreover, the website guides users to a host of national educational and civil rights databases to inform local and national initiatives impacting Males of Color.

Urban School Board Survey: Characteristics, Structure, and Governance of Large Urban School Boards

Overview

This is the fourth in a series of reports on the makeup and structure of school boards in the nation's large urban school districts. This report details the dimensions of school board operations that include school board governance, benefits, committee structures, campaigns, and training on key issues affecting urban school districts. This report also highlights demographic trends in the makeup of school boards in urban school districts.

Update

The survey was sent to the superintendents, school board members, and school board secretaries across the Council's membership in the summer of 2015. The results are now available in a PowerPoint summary of the findings.

District by District Performance Reporting

In preparation for the Council's annual analysis of student achievement, the Research team collected school and district-level student performance data on state tests. The data include student performance on Common Core State Standards assessments--Partnership for Assessment of Readiness for College and Careers (PARCC) and Smarter Balanced Assessment (SBA)—among other state-designed standardized assessments. The Research team analyzes student assessment results and presents city-by-city profiles, including year-by-year and grade-by-grade statistics on each state test in mathematics and reading. The research team is exploring potential means of analyzing and presenting the new state assessment results. Given the significant changes in testing and assessment over the past two years, the team is exploring new options for district-by-district performance reporting.

TUDA



NEWS RELEASE

For Immediate Release: March 8, 2016

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Six Large Urban School Districts to Join The Nation's Report Card *Las Vegas, Denver, Fort Worth, Greensboro, Milwaukee and Memphis Join the NAEP Trial Urban District Assessment Starting in 2017*

WASHINGTON -- The National Assessment of Educational Progress (NAEP) will include six more urban school districts from around the country after a unanimous vote Saturday by the National Assessment Governing Board to expand the Trial Urban District Assessment (TUDA) program.

The six districts -- Clark County School District (including Las Vegas); Denver Public Schools; Fort Worth Independent School District (Texas); Guilford County Schools (including Greensboro, North Carolina); Milwaukee Public Schools; and Shelby County Schools (including Memphis, Tennessee) -- volunteered to be part of NAEP administration starting in 2017. TUDA is a special part of the NAEP program that provides results of how fourth- and eighth-graders perform in reading and mathematics in some of the nation's largest urban school districts. The vote of the Governing Board, which sets policy for NAEP, brings the total number of TUDA districts to 27.

The idea for a big-city version of NAEP, also known as The Nation's Report Card, originated in 2000, when the Council of the Great City Schools -- a coalition of the nation's large urban public school districts led by Executive Director Michael Casserly -- requested that the Governing Board conduct a trial NAEP assessment for large urban school districts that volunteered to participate. Congress first authorized funding for TUDA in 2002, and increases in funding over time have enabled the Governing Board to expand the program.

"The Governing Board values Mr. Casserly's foresight and leadership and the bipartisan support from Congress, the president and the Department of Education to support the expansion of this program," said Governing Board Chair Terry Mazany. "TUDA provides school district leaders, parents and civic leaders with objective and comparable data to measure the progress of student achievement over time in many of the country's largest school districts."

"The addition of these six new cities to the Trial Urban District Assessment of NAEP is a major step forward for the program and will help sustain efforts to improve the nation's large-city

public schools well into the future," Casserly said. "We are thrilled that 27 cities will be participating in 2017."

TUDA tests representative samples of students and it reports district-level student achievement results, including trends over time. To be eligible for TUDA, a district must be in a city with a population of 250,000 or more, and at least half of its student population must include minority racial or ethnic groups or must be eligible for free and reduced-price lunch. New TUDA districts must be large enough to support testing three NAEP subjects per year in grades four and eight. The six districts join these other school systems:

- Albuquerque Public Schools
- Atlanta Public Schools
- Austin Independent School District
- Baltimore City Public Schools
- Boston Public Schools
- Charlotte-Mecklenburg Schools
- Chicago Public Schools
- Cleveland Metropolitan School District
- Dallas Independent School District
- Detroit Public Schools
- District of Columbia Public Schools
- Duval County Public Schools (Jacksonville, Florida)
- Fresno Unified School District (California)
- Hillsborough County Public Schools (Florida)
- Houston Independent School District
- Jefferson County Public Schools (Kentucky)
- Los Angeles Unified School District
- Miami-Dade County Public Schools
- New York City Public Schools
- School District of Philadelphia
- San Diego Unified School District

"We now have an ever greater geographic representation in TUDA, with four more states included. This will provide the nation with an objective picture of the achievement spanning the diversity of our nation's students, recognizing that the majority of students in our nation's schools is now comprised of minority populations," Mazany said.

View a list of current and eligible TUDA districts at www.nagb.org/policies/list-tuda-districts.html.

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The National Assessment of Educational Progress is the only nationally representative, continuing evaluation of the condition of education in the United States. It has served as a national yardstick of student achievement since 1969. Through The Nation's Report Card, NAEP informs the public about what American students know and can do in various subject areas and compares achievement among states, large urban districts, and various student demographic groups.

The National Assessment Governing Board is an independent, nonpartisan board whose members include governors, state legislators, local and state school officials, educators, business representatives, and members of the general public. Congress created the 26-member Governing Board in 1988 to oversee and set policy for NAEP.

*The National Assessment of Educational Progress (NAEP) is a congressionally authorized project sponsored by the U.S. Department of Education. The **National Center for Education Statistics**, within the Institute of Education Sciences, administers NAEP. The Commissioner of Education Statistics is responsible by law for carrying out the NAEP project.*

2017 Trial Urban District Assessment Expansion

On December 18, 2015, Congress passed and the President signed the “Consolidated Appropriations Act, 2016”. The fiscal year 2016 appropriations provided a critical infusion of funds for NAEP. The NAEP program was appropriated \$149 million, an increase of \$20 million from the previous year. The President’s justification to Congress for this increase included the Board’s priority to expand the Trial Urban District Assessment (TUDA) program. The National Center of Education Statistics (NCES) conducted a budget review of the increased funding and revised cost estimates to implement the Governing Board’s Assessment Schedule and priorities, including the investment required to implement digital-based assessments (DBA). NCES estimates that the NAEP budget could support an expansion of up to six new TUDA participants beginning with the 2017 NAEP.

The Governing Board staff worked in partnership with NCES and the Council of the Great City Schools staff to identify and invite eligible districts to participate in the program. This work was conducted in accordance with the Governing Board’s TUDA policy.

Of the 16 large urban districts eligible to participate in TUDA, six districts submitted official letters of intent indicating their voluntary long term commitment to the program, if approved by the Board to participate. These six districts are:

- 1) Clark County School District (including Las Vegas, NV);
- 2) Denver Public Schools (CO);
- 3) Fort Worth Independent School District (TX);
- 4) Guilford County Schools (including Greensboro, NC);
- 5) Milwaukee Public Schools (WI); and
- 6) Shelby County Schools (including Memphis, TN).

Recommended Action: Approve the six districts that submitted an official letter of intent to participate in the TUDA program beginning in 2017.

The following pages include the below-listed materials to inform the Executive Committee and Governing Board’s decisions.

- List of Eligible Districts for 2017 TUDA
- Eligibility Criteria and Procedures for Selecting Districts for Participation in the NAEP TUDA (2012)
- Map of Districts Participating in TUDA, Including Recommended New Districts for 2017

List of Eligible Districts for 2017 Trial Urban District Assessments (TUDA)

Districts Participating in the 2017 TUDA

- 1) Albuquerque Public Schools (NM)
- 2) Atlanta Public Schools (GA)
- 3) Austin Independent School District (TX)
- 4) Baltimore City Public Schools (MD)
- 5) Boston Public Schools (MA)
- 6) Charlotte-Mecklenburg Schools (NC)
- 7) Chicago Public Schools (IL)
- 8) Cleveland Metropolitan School District (OH)
- 9) Dallas Independent School District (TX)
- 10) Detroit Public Schools (MI)
- 11) District of Columbia Public Schools (DC)
- 12) Duval County Public Schools (Jacksonville, FL)
- 13) Fresno Unified School District (CA)
- 14) Hillsborough County Public Schools (FL)
- 15) Houston Independent School District (TX)
- 16) Jefferson County Public Schools (KY)
- 17) Los Angeles Unified School District (CA)
- 18) Miami-Dade County Public Schools (FL)
- 19) New York City Public Schools (NY)
- 20) School District of Philadelphia (PA)
- 21) San Diego Unified School District (CA)

Districts Eligible to Participate in the 2017 TUDA (*pending NAEP funding*)

Submitted an Official Letter of Intent to Participate:

- 1) **Clark County School District (including Las Vegas, NV)**
- 2) **Denver Public Schools (CO)**
- 3) **Fort Worth Independent School District (TX)**
- 4) **Guilford County Schools (including Greensboro, NC)**
- 5) **Milwaukee Public Schools (WI)**
- 6) **Shelby County Schools (including Memphis, TN)**

Did Not Submit an Official Letter of Intent to Participate:

- 7) Arlington Independent School District (TX)
- 8) Cypress-Fairbanks Independent School District (TX)
- 9) Davidson County Schools (including Nashville, TN)
- 10) Elk Grove Unified School District (CA)
- 11) Fort Bend Independent School District (TX)
- 12) Long Beach Unified School District (CA)
- 13) Mesa Public School (AZ)
- 14) North East Independent School District (TX)
- 15) Northside Independent School District (TX)
- 16) Wake County Schools (including Raleigh, NC)



Adopted: March 3, 2007
Revised: August 4, 2012

National Assessment Governing Board

Eligibility Criteria and Procedures for Selecting Districts for Participation in the National Assessment of Educational Progress

Trial Urban District Assessment

Policy Statement

Purpose

To define the eligibility criteria and selection procedures for participation of urban school districts in the National Assessment of Educational Progress (NAEP) Trial Urban District Assessment (TUDA).

Guiding Principles

Principle 1

Participation in TUDA shall be voluntary.

Principle 2

A primary goal of TUDA is to support the improvement of student achievement in the nation's large urban school districts and to focus attention on the specific challenges and accomplishments associated with urban education.

Principle 3

Districts participating in TUDA shall have the characteristics of large urban areas.

Principle 4

All districts that have participated in TUDA without interruption once included shall be deemed eligible and permitted to continue to participate.

Principle 5

The eligibility criteria for participation in TUDA shall promote (1) inter-district comparability, so that participating districts are reasonably similar with respect to key demographics and (2) efficiency in resources required of the NAEP program.

Principle 6

Increasing the total number of districts participating in TUDA shall be contingent on additional funding from Congress.

Principle 7

The Governing Board implements the selection procedures used to consider districts for participation in TUDA.

Principle 8

Districts applying for participation in TUDA should be committed to long-term participation.

Eligibility Criteria

1. Only cities having 250,000 or more population shall be represented in TUDA.
2. Districts participating in TUDA shall have a student enrollment large enough to support NAEP assessments in three subjects in each grade assessed. The enrollment requirement is a minimum of approximately 1,500 students per subject per grade level assessed.
3. Districts participating in TUDA shall have an enrollment district-wide or in the grade levels assessed that meets at least one of the following criteria:
 - a. 50% or more are minority students (i.e., African American, American Indian/Alaskan Native, Asian, Hispanic, Native Hawaiian/Other Pacific Islander, and/or multi-racial).
 - b. 50% or more are eligible for participation in the free and reduced-price lunch program (or other appropriate indicator of poverty status).

Districts that are very near to meeting a particular eligibility requirement may be considered eligible if they request to participate in the program and if funds are sufficient to permit participation. Eligibility data shall be updated and verified periodically.

Application and Selection Process/Procedures

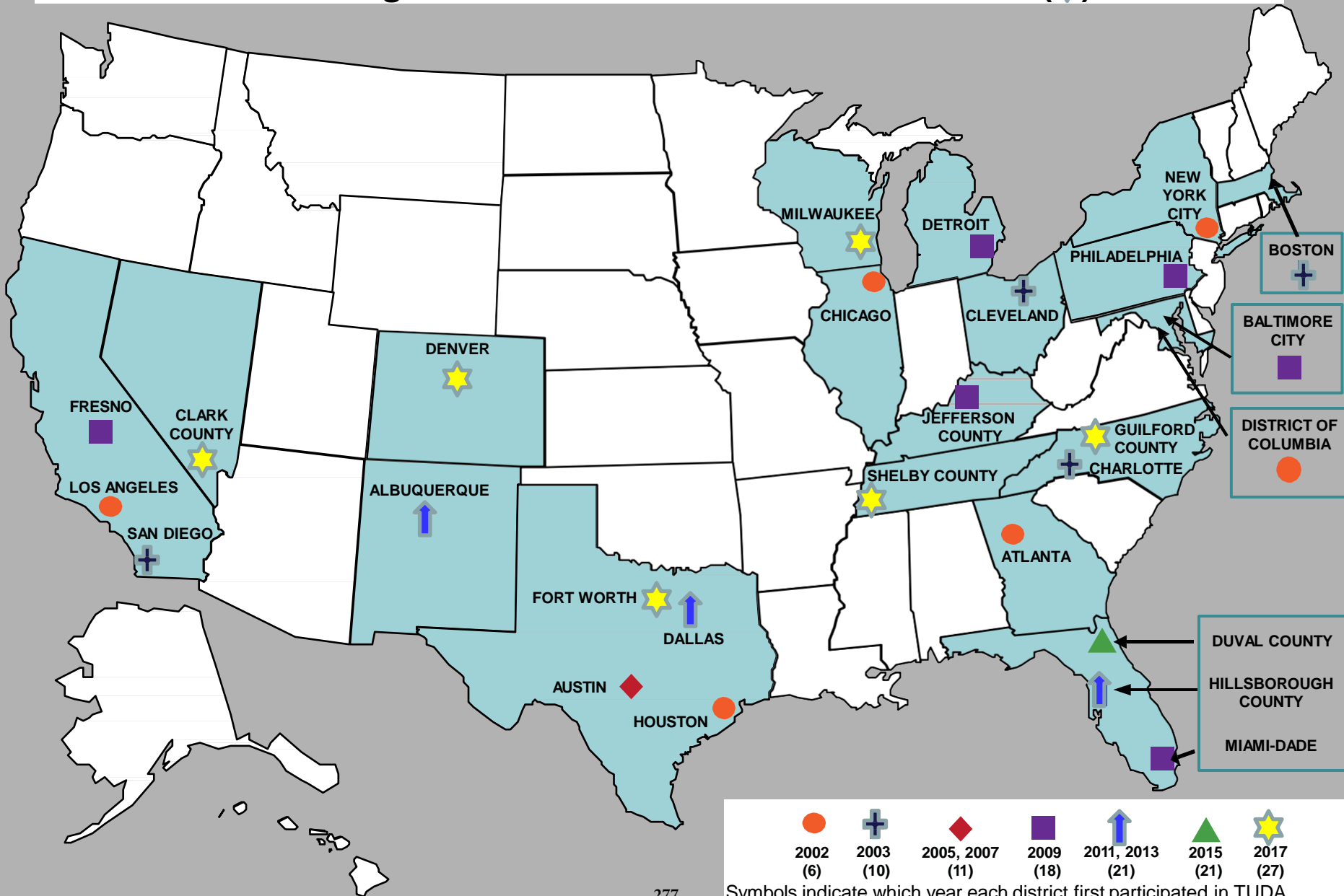
To provide time for consultation, notification, and operational planning for the conduct of the Trial Urban District Assessments, the steps described below should be sequenced to conclude approximately 14 months prior to the start of testing.

1. Prior to the assessment year in which TUDA is to be conducted, the Governing Board Executive Director, in consultation with the National Center for Education Statistics (NCES), prepares a list of eligible districts and posts that list on the Governing Board website.
2. Prior to the assessment year in which TUDA is to be conducted, the Governing Board Executive Director sends a letter to each district that participated in the immediately preceding administration of TUDA to determine the district's interest in continuing as a participant in the upcoming administration of TUDA.
3. Based on funding from Congress and the decision of any previous TUDA participant not to continue, the Governing Board determines whether new districts can be considered for participation in the upcoming TUDA administration.
4. If the Governing Board determines that new districts can be considered for participation in the upcoming TUDA administration, the Governing Board Executive Director sends a letter notifying eligible districts of the opportunity to submit an application and the instructions for applying.
5. Eligible districts seeking to participate in TUDA submit an application to the Executive Director of the Governing Board. The application should be signed by the district superintendent or designee, include the most recent information documenting the district's enrollment and eligibility, and contain a commitment for long-term participation in TUDA if selected.
6. The Executive Director of the Governing Board and appropriate staff of the Governing Board shall review applications in consultation with the Chairman of the Governing Board, the Chairman of the Board's Committee on Standards, Design and Methodology, staff of the National Center for Education Statistics, and the Executive Director of the Council of the Great City Schools.
7. The Executive Director of the Governing Board shall recommend new districts for participation in TUDA to the Governing Board for final action.
8. The Executive Director of the Governing Board shall send notification of the Board's decision regarding district participation in TUDA to the district and to the Commissioner of Education Statistics.

Potential Pool of Eligible Districts

The list of eligible districts shall be posted on the website of the National Assessment Governing Board (www.nagb.gov) and made publicly available through other appropriate means. The list of districts will change from time to time due to changes in the population of the district and the district setting.

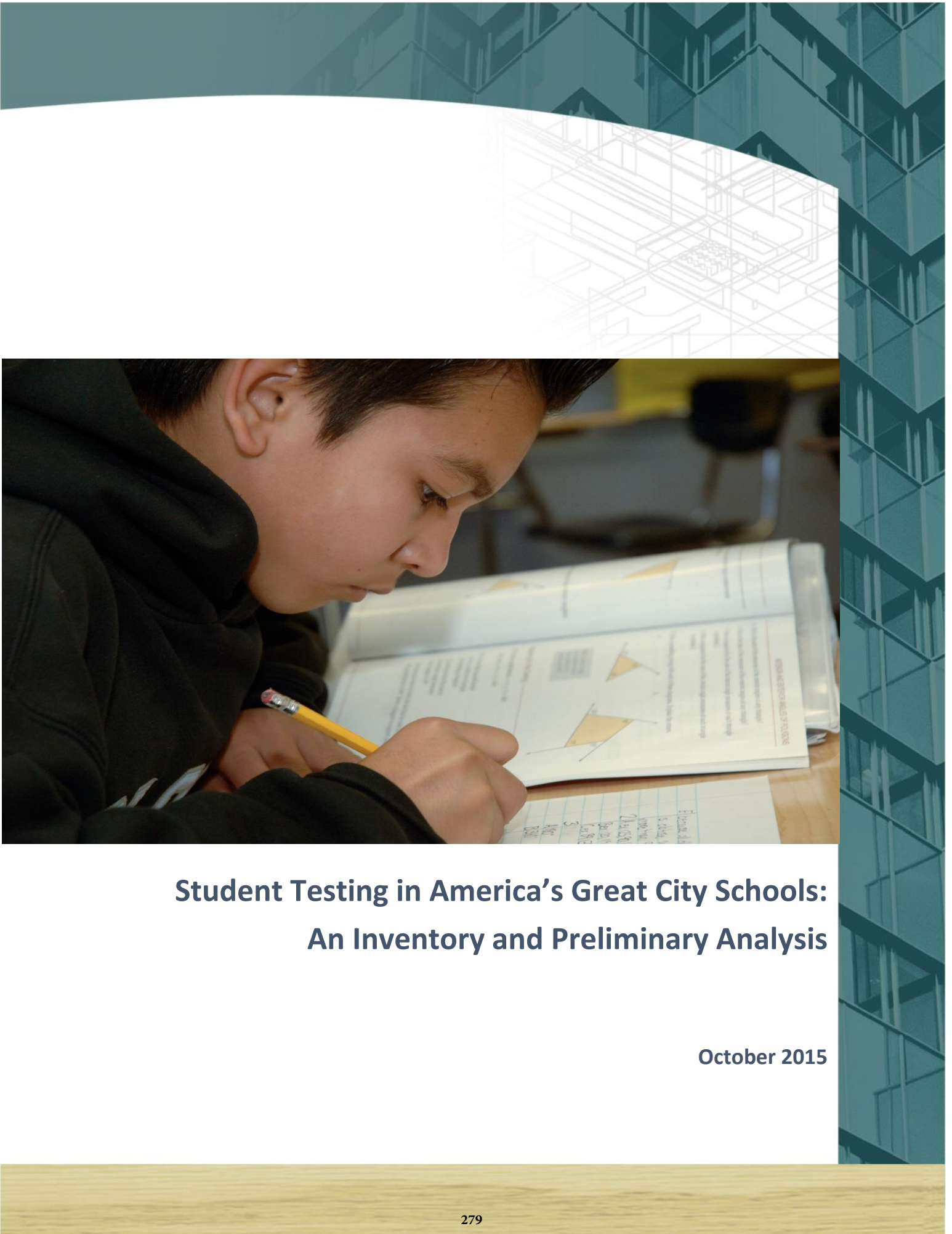
Map of Districts Participating in Trial Urban District Assessment (TUDA) Including New Districts Recommended for 2017 (★)



●	+	◆	■	↑	▲	★
2002 (6)	2003 (10)	2005, 2007 (11)	2009 (18)	2011, 2013 (21)	2015 (21)	2017 (27)

Symbols indicate which year each district first participated in TUDA, excluding Milwaukee which participated in TUDA in 2013 and rejoined in 2017 (#) Indicates the total number of districts participating in TUDA each year

TESTING REPORT



Student Testing in America's Great City Schools: An Inventory and Preliminary Analysis

October 2015

Student Testing in America's Great City Schools: An Inventory and Preliminary Analysis

By the

Council of the Great City Schools



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October 2015

Contents

Contents	4
Figures.....	4
Tables.....	5
Preface.....	7
Summary of Results	9
Introduction.....	13
Methodology and Analysis	15
Interpreting the Data	21
Findings.....	25
I. Assessments Required of All Students in a Given Grade	25
II. Sample and Optional Assessments.....	51
III. Assessments for Special Populations.....	56
IV. Looking at Testing in the District Context	64
V. The Costs of Testing in a Sample District	78
VI. Parents.....	80
Discussion and Preliminary Recommendations.....	83
References.....	89
Appendix A. The Federal Role in Assessment Policy	91
Appendix B. Mandated Tests by District.....	110
Appendix C. Georgia CTE Tests	114
Appendix D. Assessment Survey.....	132
Appendix E. Examples of Other Mandated Assessments.....	158
Appendix F. Council of the Great City Schools	162

Figures

Figure 1. Average Number of Total Assessments per District Mandated for All Children by Grade Level.....	26
Figure 2. Average Number of Assessments Mandated for All Children by Type of Use	27
Figure 3. Average Testing Time in Hours Per Year for All Mandated Assessments for the Population of Students at Each Grade Level	28
Figure 4. State Tests Administered in Grades 3-8 and in High School in the 2014-15 Academic School Year Pursuant to NCLB	30
Figure 5. Average Testing Time in Hours per Year for All PARCC/SBAC/Other State NCLB Assessments at Each Grade Level	30
Figure 6. Time Allotted for General Education Students to Complete State-Developed NCLB Assessments (Excluding PARCC/SBAC)	32
Figure 7. Item Types for All PARCC/SBAC/Other State NCLB Assessments	33

Student Testing in America’s Great City Schools

Figure 8. Return Rate for State and District NCLB and Formative Assessment Results	34
Figure 9. Average Number of Secondary-grade Level EOCs by Subject Area (in Districts Having EOCs).....	36
Figure 10. EOC Item Types	37
Figure 11. Time Allotted for General Education Students to Complete EOC Assessments	37
Figure 12. Average Testing Time in Hours per Grade for EOC Assessments	38
Figure 13. EOC Assessments Included in State Accountability as a Result of NCLB Waivers ..	38
Figure 14. Districtwide Formative Assessment Administration.....	39
Figure 15. Frequency of Formative Assessments	40
Figure 16. Average Testing Time per Year for Formative Assessments Mandated for All Students at Each Grade Level	40
Figure 17. SLO Assessments Included in State Accountability	42
Figure 18. Average Testing Time per Year for SLO Assessments for the Population of Students at each Grade Level	42
Figure 19. Average Testing Time per Year for All Other Mandated Assessments for the Population of Students at Each Grade Level	44
Figure 20. Relationship Between Testing Time in Grades K to 4 and Fourth Grade NAEP Scores in Math	49
Figure 21. Relationship Between Testing Time in Grades K to 4 and Fourth Grade NAEP Scores in Reading	49
Figure 22. Relationship Between Testing Time in Grades K to 8 and Eighth Grade NAEP Scores in Math	50
Figure 23. Relationship Between Testing Time in Grades K to 8 and Eighth Grade NAEP Scores in Reading	50
Figure 24. Average Testing Time per Year for School, District, or Grant-Optional Assessments Given Only to Selected Students at Each Grade Level.....	52
Figure 25. Average Testing Time per Year for Student-Selected Optional Assessments	53
Figure 26. Career and Technical Education Testing Results Included in State Race to the Top or NCLB Waivers.....	55
Figure 27. Great City School Parent Perceptions about Testing	81

Tables

Table 1. Estimated Testing Times for SBAC and PARCC	31
Table 2. Comparison of Mandatory Testing Time in Two Districts.....	46
Table 3. Sample Assessments Used for Special Education Eligibility and Re-evaluation.....	59
Table 4. Tests Used to Assess English Language Proficiency, 2014-15	61
Table 5. Most Commonly Administered Assessments in the Great City Schools.....	64
Table 6. Testing Portfolio and Calendar for Hillsborough County, 2014-15	65
Table 7. Example of Testing Experience of a Sample ELL Third Grader in High and Low Testing Districts	68

Student Testing in America’s Great City Schools

Table 8. Example of Testing Experience of Sample ELL Eighth Grader in High and Low Testing Districts 69

Table 9. Example of Testing Experience of Sample ELL Eleventh Grader Who Is Taking a CTE and/or AP Exam in High and Low Testing Districts 71

Table 10. Sample District Assessment Budget 79

Preface

Testing in the nation's schools is among the most debated issues in public education today. Much of this discussion has centered on how much we are testing students and how we use test results to evaluate teachers, inform instructional practice, and hold schools and educators accountable. A recent national poll by Phi Delta Kappa¹ underscores the fact that the public at large is concerned about the extent of testing in schools, and these concerns are influencing how people think about the nationwide move to adopt and implement the new Common Core State Standards. The issue of testing has also emerged in debates in both the U.S. House of Representatives and the Senate over the reauthorization of the federal Elementary and Secondary Education Act, and President Barack Obama and Secretary of Education Arne Duncan have both spoken publicly on the issue and the need for reform.

Some of the testing debate has been well informed and thoughtful, and some of it has been self-serving and misleading. Either way, there has been little data collected on how much testing actually goes on in America's schools and how the results are used. This report aims to provide some dispassionate evidence on testing without aligning it with either the pro-testing or anti-testing factions.

In October 2013, the board of directors of the Council of the Great City Schools, which is composed of superintendents and school board members from the nation's largest urban public school systems, proposed a major inventory of testing practices in the Great City Schools. The board agreed to focus primarily on what assessments were being used, who mandated those assessments, what we were learning by administering those assessments, and why we were using them. While there are other important issues about testing that still need to be tackled, the board agreed that we should start with these topics and continue collecting data over the upcoming years to inform efforts to improve our assessment practices.

With extensive input from member districts, Council staff developed and launched a survey of assessment practices in the spring of 2014. This report presents the findings from that survey and subsequent Council analysis and review of the data. It also offers an initial set of observations about testing in our school systems and how it might be improved. The report does not answer all questions on this complex issue, but it should give a more complete and well-rounded picture of the amount and range of tests administered in the nation's urban school systems.

The Council and its members intend to continue work in this area in order to compare and improve our testing practices, over time building more strategic, rational systems for assessing progress and improving student achievement.

¹ Phi Delta Kappa/Gallup (2015). *PDK/Gallup Poll of the Public's Attitudes Toward the Public Schools: The 2015 PDK/Gallup Poll Report*. Bloomington, IN.

Summary of Results

Based on the Council's survey of member districts, its analysis of district testing calendars, interviews, and its review and analysis of federal, state, and locally mandated assessments, this study found—

- ❖ In the 2014-15 school year, 401 unique tests were administered across subjects in the 66 Great City School systems.
- ❖ Students in the 66 districts were required to take an average of 112.3 tests between pre-K and grade 12. (This number does not include optional tests, diagnostic tests for students with disabilities or English learners, school-developed or required tests, or teacher designed or developed tests.)
- ❖ The average student in these districts will typically take about eight standardized tests per year, e.g., two NCLB tests (reading and math), and three formative exams in two subjects per year.
- ❖ In the 2014-15 school year, students in the 66 urban school districts sat for tests more than 6,570 times. Some of these tests are administered to fulfill federal requirements under No Child Left Behind, NCLB waivers, or Race to the Top (RTT), while many others originate at the state and local levels. Others were optional.
- ❖ Testing pursuant to NCLB in grades three through eight and once in high school in reading and mathematics is universal across all cities. Science testing is also universal according to the grade bands specified in NCLB.
- ❖ Testing in grades PK-2 is less prevalent than in other grades, but survey results indicate that testing in these grades is common as well. These tests are required more by districts than by states, and they vary considerably across districts even within the same state.
- ❖ Middle school students are more likely than elementary school students to take tests in science, writing, technology, and end-of-course (EOC) exams.
- ❖ The average amount of testing time devoted to mandated tests among eighth-grade students in the 2014-15 school year was approximately 4.22 days or 2.34 percent of school time. (Eighth grade was the grade in which testing time was the highest.) (This only counted time spent on tests that were required for all students in the eighth grade and does not include time to administer or prepare for testing, nor does it include sample, optional, and special-population testing.)
- ❖ Testing time in districts is determined as much by the number of times assessments are given during the school year as it is by the number of assessments.

Student Testing in America's Great City Schools

- ❖ There is no correlation between the amount of mandated testing time and the reading and math scores in grades four and eight on the National Assessment of Educational Progress (NAEP).
- ❖ Test burden is particularly high at the high-school level, although much of this testing is optional or is done only for students enrolled in special courses or programs. In addition to high school graduation assessments and optional college-entry exams, high school students take a number of other assessments that are often mandated by the state or required through NCLB waivers or Race to the Top provisions. For instance—
 - In 71.2 percent of the 66 districts, students are required to take end-of-course (EOC) exams to fulfill NCLB requirements—sometimes in addition to their state-required summative test.
 - Approximately half of the districts (46.8 percent) reported that EOC exams factor into their state accountability measures.
 - In 47 percent of districts, students are required by their states to take career and technical education (CTE) exams if they are taking a CTE course or group of courses. This requirement can also be in addition to state summative exams and EOC tests.
 - About 40 percent (37.9 percent) of districts report that students—both elementary and secondary—are required to take exams in non-NCLB-tested grades and subjects. These are sometimes known as Student Learning Objective (SLOs) assessments or value-added measures.
- ❖ Urban school districts have more tests designed for diagnostic purposes than any other use, while having the fewest tests in place for purposes of international comparisons.
- ❖ The majority of city school districts administered either PARCC or SBAC during the past school year. Almost a quarter (22.7 percent) administered PARCC assessments and 25.8 percent administered SBAC assessments in spring 2015. Another 35 percent administered the same statewide assessments in reading and math as they did in 2013-2014 (e.g., Texas, Virginia). And 16.7 percent of districts administered a new state-developed college- and career-ready (CCR) assessment (e.g., Georgia, Florida). In other words, there were substantial variations in state assessments and results this past school year.
- ❖ Opt-out rates among the Great City Schools on which we have data were typically less than one percent, but there were noticeable exceptions.
- ❖ On top of state-required summative exams, EOCs, SLOs, graduation tests, and college-entry exams, many districts (59.1 percent) administered districtwide formative assessments during the school year. A number of districts (10.6 percent) administered formative

Student Testing in America's Great City Schools

assessments mandated by the state for some students in some grades and administered their own formative assessments for other students and grades. Almost half of the districts using formative assessments administered them three times during the school year.

- ❖ Some 39 percent of districts reported having to wait between two and four months before final state test results were available at the school level, thereby minimizing their utility for instructional purposes. In addition, most state tests are administered in the spring and results come back to the districts after the conclusion of the school year.
- ❖ The total costs of these assessments do not constitute a large share of an average urban school system's total budget.
- ❖ There is sometimes redundancy in the exams districts give. For example, multiple exams are sometimes given in the same subjects and grades to the same students because not all results yield data by item, grade, subject, student, or school—thereby prompting districts to give another exam in order to get data at the desired level of granularity.
- ❖ In a number of instances, districts use standardized assessments for purposes other than those for which they were designed. Some of these applications are state-recommended or state-required policies, and some originate locally.
- ❖ The findings suggest that some tests are not well aligned to each other, are not specifically aligned with college- or career-ready standards, and often do not assess student mastery of any specific content.
- ❖ According to a poll of urban public school parents administered by the Council of the Great City Schools in the fall of 2014, respondents had very mixed reactions towards testing. For instance, a majority (78 percent) of responding parents agreed or strongly agreed that “accountability for how well my child is educated is important, and it begins with accurate measurement of what he/she is learning in school.” Yet this support drops significantly when the word “test” appears.
- ❖ Parents respond more favorably to the need for improving tests than to references to more rigorous or harder tests. Wording about “harder” tests or “more rigorous” tests do not resonate well with parents. Parents support replacing current tests with “better” tests.
- ❖ Finally, survey results indicate that parents want to know how their own child is doing in school, and how testing will help ensure equal access to a high quality education. The sentence, “It is important to have an accurate measure of what my child knows.” is supported or strongly supported by 82 percent of public school parents in our polling. Language about “testing” is not.

Introduction

The history of standardized testing in America's schools is long and checkered. Testing has been used to determine college entrance, suitability for employment, placement in the military, and eligibility to vote. It emerged in the nation's elementary and secondary schools almost as soon as public education was founded in the early 1800s. Still, it was not until the 1930s, when the need for student assessments merged with the first computerized test scanners to produce the first bubble tests, that standardized testing began to look like what it does now.

The original Scholastic Aptitude Test (SAT) and the American College Testing (ACT) began to take their current forms around this time, and by the 1940s and 1950s they were almost universally accepted measures of academic attainment and college admissibility. Large-scale testing by states emerged in the 1970s with the rise of the basic skills and minimum competency movements, and the federal government started its own standardized testing in the 1970s and 1980s with the National Assessment of Education Progress (NAEP).

Along the way, standardized testing became the subject of widespread criticism as it was often used to restrict voting rights, immigration, jobs, and access to quality schooling. To be sure, it was a cost-effective mechanism for conducting large-scale and rapid appraisals of academic achievement in schools, but it was also used to bolster racial stereotypes about intelligence and track students into second-rate course work and limit educational and social opportunities.

The simple truth is that the nation has been marching down this road of ever-greater testing for some time. We have assumed that if we measure student attainment, it will improve. But we never assumed that, if we tested the same thing over and over again, achievement would improve even more.

The latest debates around testing are centered on questions about whether there is too much of it. Is too much testing conducted in our schools? Is testing taking time away from instruction or hijacking the focus and content of instruction? What are the results used for? Is it appropriate to use test scores to evaluate school staff and teachers? Much of this debate arose with the *No Child Left Behind* (NCLB) Act, but the discussion became inflamed nationally with the development of the Common Core State Standards (CCSS) and assessments that were developed to measure their attainment and to evaluate teachers.

Some of this debate has been thoughtful and well-reasoned; some has been baseless and ill-informed. The controversies have stoked the testing "opt-out" movement, fueled divisions among public educators and others, undermined the new state standards, and created substantial backlash over the use of the assessments.

Much of this backlash has been aimed at local school systems, but evidence in this report indicates that culpability for our assessment system also rests at the doorsteps of Congress, the U.S. Department of Education, the states, and test publishers and vendors.

Student Testing in America's Great City Schools

Given this context of emotionally charged controversy and incomplete information, this report aims to provide the public, along with teachers and leaders in the Great City Schools, with objective evidence about the extent of standardized testing in public schools and how these assessments are used.

Work on this project arose out of a lengthy discussion about testing at meeting of the Board of Directors of the Council of the Great City Schools in October 2013. At that time the board, which is composed of the superintendent and one school board member from each of the Council's member urban school system, agreed that the organization lacked comprehensive data on testing in its school systems.

The group was also interested in determining the origins of various assessments and requirements, gaining a better understanding of parental perspectives on testing, and drawing some broad lessons about the use of test results in urban school systems across the nation.

To address these needs, the board charged Council staff with conducting a major inventory of testing practices across member districts. The results of this inventory and analysis are presented in the following chapters. Of course, this is only a first step. Over time, we are committed to developing guidelines and recommendations that would help member districts and others create more coherent and strategic testing systems, including steps school districts could take to help parents and others better understand the purposes and outcomes of testing.

Methodology and Analysis

A. Methodology

Developing and Fielding the Assessment Survey

This study sought to answer the following questions:

1. What assessments do urban school districts administer?
2. What are the assessments used for?
3. How much time is devoted to taking these assessments?
4. Who requires these assessments?
5. What do parents think of testing?

To answer these questions, Council staff developed a comprehensive district survey in early 2014. (See Appendix D.) The survey was then reviewed by the organization's board of directors and was sent out to directors of research and assessment in each member district in the summer of 2014. These individuals were asked to coordinate responses with other district personnel and to provide information on the upcoming 2014-15 school year rather than the ongoing 2013-14 year. Changes in testing practices throughout the 2014-15 school year were tracked by staff members.²

Survey questions asked for information on both summative and formative assessments given at each grade, subjects tested, student groups tested, testing time, the origins of the tests, and uses of test data.

Data on required assessments for all students in a specified grade were collected on each of the following—

- State summative assessments used for school accountability purposes under *No Child Left Behind*, including PARCC, SBAC, and others
- Formative assessments in states and locales where they were required for all students in a specified grade
- End-of-course exams in locales where they were required for all students
- Student Learning Objectives (SLOs) or other exams that were required for all students in a given grade in otherwise non-tested grades and subjects
- Other mandatory exams that were administered to all students in a specified grade

In addition, the survey asked for information on other districtwide assessments that were administered to some or only a sample of students, i.e., not all students in a specified grade. These tests also included students who were tested according to the program in which they were enrolled.

² Because many states and school districts had not finalized their assessment plans for 2014-15 when the survey was initially administered, the Council's research team monitored and updated survey responses throughout the 2014-15 school year. To do so, the team kept track of state legislation, U.S. Department of Education guidelines, and updates to district testing calendars and websites. Also, the research team continuously interviewed district assessment staff.

Student Testing in America's Great City Schools

Also, the survey asked about assessments that were optional, particularly for the student. Of course, not every test fell neatly into one of these categories. A test that was required of all students in a particular grade in one district might be given to only a sample in another district. The Council's research team was careful to make sure that the administration and use of each exam was understood so it would be classified in the correct category. In addition, the team was careful not to double-count tests across categories.

These sample, specialized, and optional exams often included—

- Districtwide norm-referenced assessments—such as the ITBS, the Terranova, the NWEA, or others—when they were given on a sample basis (otherwise, when they were administered to all students in a particular grade, they were included in the mandatory category above.)
- Assessments that were used districtwide but were either optional or that were designed for students participating in particular programs or courses of study. Examples of optional tests included the SAT and ACT (when they were not required for all students in a grade), while tests associated with particular courses included exams such as Advanced Placement (AP) and International Baccalaureate (IB) tests and Career and Technical Education (CTE) instruments.

Finally, we gathered assessment information on specific categories of students, including students with disabilities and English language learners.

For all these assessments, the Council asked for information about—

- Time required for students to take the tests
- How students participating in each test were identified and whether this constituted a sample or the full universe of students at a particular grade level
- Item types, e.g., multiple choice, short answer, extended response, performance task
- Overall testing budgets
- Who required or mandated the test
- Whether or not the results of each test were used for state or personnel accountability purposes
- What grades and subjects were tested
- Use of the tests to determine student grades
- Instructional purposes of the tests
- Amount of time required to get test results back to schools and teachers
- How often the tests were administered each year.

Student Testing in America's Great City Schools

By November 2014, 54 of the Council's 67 member districts had completed the survey. Council staff members then collected each district's testing calendars, reconciled survey responses with the calendars, and interviewed district personnel to ensure that data were comprehensive and consistently reported. In particular, the team looked at whether responses from districts in the same state were consistent. Initially, for example, districts in a state would attribute the origin of a test to the district itself or to the state, while another district in the same state might attribute the same test to the federal government. Sorting out these responses took considerable time and care.

During this time, the research team began to monitor the 54 districts for changes in assessment plans and practices. Most state and district testing calendars changed during the course of the 2014-15 school year, and some were revised as late as March and April 2015. The Council also used district testing calendars, district and state websites, and interviews to gather data on the 12 districts that had not responded to the original survey.³

While the Council asked about which student assessments were used for personnel evaluation purposes, we did not collect data on tools such as the Vanderbilt Assessment of Leadership in Education (VAL-ED) that are used to evaluate principals but are not administered to students. In addition, we did not examine technology-based platforms, such as those developed by Teachscape, that are sometimes used to hold data on teacher evaluations and professional development. And we did not examine instruments or surveys that students sometimes complete to assess their perceptions of their teachers, such as those developed by the Tripod Project.

In other words, there is considerable information in this report, but it may not have captured some specialty tests, it does not answer every question, and it doesn't necessarily offer complete answers to every question it does tackle. Still, we hope the results are useful.

Additional Data Collection

To supplement the survey data, the research team conducted a comprehensive review of all federal, state, and local mandates for each assessment. This review produced state-by-state timelines on assessments resulting from the U.S. Department of Education's Race to the Top fund (RTT) announcements and awards, changes in state laws on assessments and teacher evaluations connected to those federal programs, and changes to assessments and state accountability systems included in state waivers. Given the intense debate surrounding this topic, the review was conducted to clarify *who* was requiring particular assessments. For example, several districts reported that assessments for English language learners or student learning objectives (SLOs) were state mandated. Our review often corrected this attribution. More will be said about this later in the report.

³ New Orleans was not surveyed because of the unique circumstances of the district. In addition, Arlington (TX) and San Antonio were not included because they joined the Council after the survey was administered.

Student Testing in America's Great City Schools

In addition, the Council gathered data on the number and percentage of students who opted out of mandatory testing in the spring of 2015 and conducted a poll of parents of students attending the Great City Schools about their perceptions of testing.

Finally, Council research staff conducted interviews with teachers, principals, and staff in eight Chicago schools to get their building-level perspectives on the testing they administered.

B. Analysis

Organizing and Presenting the Data

The complexity in answering questions about amounts of testing and time devoted to it arises from such issues as whether tests are required or optional and whether the tests are required of all students or just some. Even among required tests, no student ever takes all of them. For example, some districts require all tenth graders to take an EOC test, but they may not require all tenth graders to take other summative exams. Or some districts will require third grade students to take a reading or math test that they will not require of second graders. Another district may require all students to take interim or benchmark assessments but may not require all students to take SLOs.

In addition, some tests are required but are given only to a sample of students. For example, some students may be randomly selected to participate in national or international assessments, such as the National Assessment of Educational Progress (NAEP), but large numbers of other students will not participate. In other cases, students take tests by their own choice or because of the wishes of their parents. Sometimes students choose to take the ACT as they apply to college, while in other cases the ACT may be required of all students in a particular grade. In other words, a test that falls into one category in one district may fall into another category in a neighboring school district.

Finally, the assessment of English language learners, students with disabilities, and ELLs with disabilities is conducted according to federal law and current state testing requirements. For students with disabilities, this testing is typically conducted using either general assessments with or without accommodations (including additional time) or alternate assessments based on grade-level or alternate standards. In addition, ELLs will take English language proficiency tests, and students suspected of having a disability will be given a battery of diagnostic assessments to determine the exact nature of the disability.

Throughout this report, we frequently refer to these three categories and differences because it became clear early in the data collection and analysis process that results could be misleading if all tests administered by school systems were treated the same, i.e., as if everyone took them. Specifically, we categorized assessments on which we had data as either mandatory (i.e., tests that were required for all students in a particular grade) or not mandatory (i.e., tests that were administered to a sample of students, were optional, or were given only to students participating in particular programs). We then created another category of tests that were only given to certain

Student Testing in America's Great City Schools

groups of students (i.e., tests that were given only to pre-school pupils, students with disabilities, or English language learners). Finally, we subdivided the mandatory assessments given to all students in a designated grade into the following categories:

1. *Statewide tests.* These are tests that are typically administered in grades three through eight and once in high school pursuant to NCLB. These assessments are grouped into one of four subcategories: (1) the Partnership for Assessment of Readiness for College and Careers (PARCC), (2) the Smarter Balanced Assessment Consortium (SBAC), (3) state-developed assessments based on previous standards (2013-14), and (4) new state-developed assessments to measure college- and career-ready standards in 2014-15.

The reader should note that we treat tests in individual subjects in this category as unique assessments. For instance, science may be mandated for all fifth graders but will not be required for fourth graders. Math may be mandated for all ninth graders but reading may not be. Consequently, math and reading tests in third grade are considered to be two assessments even if they both carry the same name.

2. *End-of-course (EOC) assessments.* These are mandatory tests given at the conclusion of a particular course of study usually in middle and/or high school grades, and typically involve tests in such core courses as English language arts, math, science, and/or social studies. The EOC assessments are often used to fulfill course requirements and/or student graduation requirements, but some states also use them to satisfy federal NCLB, state, district, or school accountability requirements. EOC exams in each subject are treated as separate tests in this report. These exams are given by course, not by grade, but this report associates courses with a particular grade. For example, Algebra 1 is associated with grade nine.
3. *Formative assessments.* These assessments are often mandatory—but not always—and include short-term tests developed by the PARCC/SBAC consortia, states, school districts, commercial publishers, and the like. They are administered to students periodically throughout the school year to assess content mastery at various points in the school year. The assessments are often given every three to six weeks and may be either cumulative in nature or discrete, covering one, two, or three instructional units per subject area. They are generally distinguished from benchmark or interim tests by their emphasis on content that has been most recently taught. Formative exams in each subject are treated as separate tests in this report.
4. *Student Learning Objectives (SLO).* SLOs are typically mandatory and are designed to assess student growth and gauge teacher effectiveness in otherwise untested grades and subjects (e.g., health, physical education, music, art, zoology). SLOs are commonly pre- and post-assessments used to determine student academic improvement over a designated

Student Testing in America's Great City Schools

period and set annual teacher expectations. SLOs in each subject are treated as separate tests in this report, but pre- and post-tests are counted as a single test.

5. *Other mandated state or district assessments.* These were assessments that may be mandated for an entire grade level but are not included in one of the other categories.
 - a. *Mandated college-readiness assessments.* These included but were not limited to assessments designed to predict college readiness, such as the ACT, SAT, PSAT, ACT Plan, ACT Explore or ACT Aspire assessments, and were only counted when they are required for all students in a particular grade. (Otherwise, we consider these tests to be optional.) These assessments sometimes serve multiple purposes, such as satisfying high school graduation requirements or assessing eligibility for National Merit Scholarships, etc.
 - b. *Interim or benchmark assessments.* These assessments are defined as those given two or three times during the school year to measure student progress. The assessments are commonly administered once in the fall, winter, and spring. Sometimes these assessments are computer adaptive, or they are used as screening devices for students. In addition, these assessments are often subject-specific, and districts have the option of purchasing or requiring various subjects independently. For instance, a district might require reading but not math. Examples include but are not limited to such tests as: the Northwest Evaluation Association's Measures of Academic Progress (NWEA-MAP), Scholastic Reading/Math Inventory (SRI/SMI), Renaissance Learning's STAR Reading/STAR Math, the Developmental Reading Assessment (DRA), the Dynamic Indicators of Basic Early Literacy Skills (DIBELS), etc. These assessments differ from formative assessments in that they generally do not assess the mastery of content. They are typically designed to measure changes in a student's overall skills.
 - c. *Nationally normed-referenced assessments.* These assessments are standardized measures that are typically developed commercially and are designed to determine how students taking the tests compare with a national norm group. They are sometimes used as screeners for gifted and talented programs and other purposes. Examples include the Iowa Test of Basic Skills (ITBS), the Cognitive Abilities Test (CogAT), the Stanford Achievement Test (SAT), and the Terranova test. For this report, these assessments were treated as one test despite the fact that they may include verbal and non-verbal sections or math and reading sections—but they are given at the same time as part of one instrument. In this report, we assume the complete battery of assessments were always administered, so we count them as one test and calculate testing time based on the full assessment.

Student Testing in America’s Great City Schools

Interpreting the Data

In putting together this report and analyzing the survey data, the Council made every effort to account for the varying nuances and complexities in how one categorizes and defines testing in the nation’s major urban school systems. For example, schools in some districts are given options for what assessments might satisfy state or district requirements. In one district, for instance, the lowest-performing schools were instructed to use one particular interim or benchmark assessment, while other schools in the same district were given the option of using any of three different assessments to meet the same requirement. Although all three assessments were reported on the district’s survey as mandated or required, the Council treated all three as one assessment because an individual student would only take one of the three, not all three in the same academic year.

In addition, average testing time and the total number of tests across Council member districts is shaped by the states in which the districts are located. In other words, districts in the same state tend to have similar numbers of tests and comparable testing time. This means that counts of tests and testing time can be affected by the number of districts in any state. For example, the Council has five districts in Ohio, so the amount of total testing time is influenced by the fact that PARCC testing is counted five times. We count each district as an independent unit.

Moreover, tests that are purchased, acquired, developed, or used at the individual school level—including those by individual teachers—are not counted in the statistics we present in this report. There are a large number of these tests below the federal, state, and district levels, but there is no way to know how many or how extensively they are used without doing a survey of individual schools. At some point, this kind of analysis should be done.

Also, we have not attempted to quantify the amount of time that is devoted either to giving or administering the tests or to preparing for them (i.e., test prep). Test administration can be particularly time-consuming when the tests are given to one student at a time. These activities can be time-consuming, but we could not gauge how much existed in this study. Again, this should be the subject of future studies.

The reader should keep all of these and other nuances in mind as you review the data presented in this report. In addition, the reader should remember the following rules that the Council’s research team applied to the data:

1. The total number of test names across the 66 urban school districts, i.e., 401 tests, is determined by counting unique assessments or assessment names as follows: (a) We count each mandated state test in reading and math as two tests—and we count mandated tests of the same name, like PARCC or SBAC, once in reading and once in math—no matter how many districts administered the assessment; (b) we count each End-of-Course (EOC) exam as a separate test for each subject in which it is given; (c) we count formative exams, regardless of whether they were developed by the state or district, according to the number

Student Testing in America's Great City Schools

of subjects in which the exams are given—not the number of times they are given, so a formative exam in math that is given three times a year is counted as one exam; (d) we count all Student Learning Objectives (SLOs) by subject regardless of the number of times it is given, so pre- and post-tests are counted once; (e) we count other mandated assessments once; (f) we count sample tests, optional tests, and program-specific tests by the subjects in which they are given, except for those instruments—like SAT-10—where subjects are part of a single test; and (g) we count pre-K tests by subject where they exist, and we count English language proficiency tests by test name—not domain (i.e., speaking, listening, reading, writing). We do not count alternate special education tests separately, and we do not count special education diagnostic tests.

2. Each subject, grade level, and test administration was considered an assessment when we calculated the total number of times that students in the 66 districts sat for an exam. This is the basis for determining that students sit for testing 6,570 times. For example, all second grade students in one district may take an interim assessment in reading and mathematics during the fall, winter, and spring. This would count as six mandated assessments for these second graders during the school year.
3. If these same second-grade students were also required to take the ITBS assessment to screen for eligibility for gifted programming in addition to the previous six interim assessments they took, then the total number of mandated assessments would be seven. (In this case, ITBS is considered one test even though it might contain questions on multiple subjects.) However, if a student only takes the ITBS when his or her teacher recommends it, then the ITBS would be considered as a sample assessment, and the total number of mandated assessments for these students would remain at six for the school year.
4. In the same vein, a student sitting for four different sections of the same subject—for example, students who are taking the four-part PARCC math test—would be counted as taking one math test, even though it was given in four parts, possibly over four days. We calculated total testing time in this case as the total time required to take all four sections.
5. The survey asks for testing time in ranges of minutes. To calculate total testing time, the research team used the high end of the range (e.g., 90 minutes for the category 61-90 minutes), rather than the midpoint, to ensure that testing time was not underestimated. Where we had exact testing times for an assessment, we used those.
6. In calculating test time, we did not assume that students would be taking all tests in all subjects for some assessments. For instance, there are 34 AP exams, but we did not assume that any student would be taking all of them. Instead, we calculated testing time for AP as the amount of time required for the average AP-test taker to take two AP exams. Likewise, there are many subjects in which SLOs are administered, but we do not assume that

Student Testing in America's Great City Schools

students take all of them. We cap the number of SLOs that an average student is likely to take at ten to correspond to the number of assessments that students are likely to take.

7. The term “mandated for all students” refers to all students at an individual grade level who are required to take a particular test. The findings are divided into those assessments that all students are expected to take at an individual grade level (e.g., state NCLB assessments) and those assessments that only a sample of students or some students at a grade level are expected to take (e.g., NAEP). The Council recognizes that not every student in a grade may actually take the required test despite the expectation or mandate (i.e., special needs students or English language learners exempt from certain assessments). Consequently, results will represent students in general but not every individual student.
8. Finally, the overall average testing time and the number of assessments presented in this report are based on all 66 districts comprising the Great City Schools in the 2014-15 school year. However, testing time and other averages presented in some sections (e.g., SLOs or EOCs) are based only on the districts reporting that they administered those respective assessments—and not all do. Consequently, the number of districts will change in each section.

Findings

In the 2014-15 school year, 401 unique tests were administered across subjects in the 66 Great City School systems.⁴ Students in these school districts sat for tests about 6,570 times over the course of the school year. This section divides these tests into three major categories: (I) assessments that are required of all students in a designated grade; (II) tests that are administered only to a sample of students, are given only when a student is enrolled in a particular program, or are optional; and (III) tests administered to special populations. There is a final section discussing parents and a section presenting examples from actual districts to illustrate the data.

I. Assessments Required of All Students in a Given Grade

Tests in this section include only those assessments that are required by the federal government, states, or local school systems and are administered to all students in the grade that is required to take the exam. The section does not include tests that are required by any of those entities but are given only to some students or a sample of students. The data also do not include time devoted to administering the tests or preparing students or teachers for the tests. Test administration can be particularly time-consuming when the tests are given to one student at a time—something this study did not take into account.

One additional cautionary note: Even when all students in a grade are required to take a test, there can sometimes be exceptions or exclusions. For instance, Chicago mandated the NWEA-MAP last school year as the basis for its accountability system, but it excluded all English language learners (ELLs) from that system when they scored below 3.0 on the English language proficiency test, ACCESS.

Figure 1 presents the average number of standardized tests that a student would be required to take between pre-K and grade 12 across the urban districts on which we have data. Results show that the average student in these 66 districts would be required to take some 112 tests between pre-K and grade 12.

This means that students, on average, will be required to take roughly eight standardized tests per year. If a student took the state summative test in reading and math in addition to a state-or district-required interim test three times a school year in both reading and math, then that student would

⁴ Data were collected on the testing portfolios of the public school districts in Albuquerque, Anchorage, Atlanta, Austin, Baltimore City, Birmingham, Boston, Bridgeport, Broward County (FL), Buffalo, Charleston, Charlotte-Mecklenburg, Chicago, Cincinnati, Clark County, Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, District of Columbia, Duval County (FL), East Baton Rouge, El Paso, Fort Worth, Fresno, Guilford County (NC), Honolulu, Hillsborough County (FL), Houston, Indianapolis, Jackson, Jefferson County, Kansas City (MO), Long Beach, Los Angeles, Miami-Dade County, Milwaukee, Minneapolis, Nashville, New York City, Newark, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (FL), Palm Beach County (FL), Philadelphia, Pittsburgh, Portland (OR), Providence, Richmond, Rochester, Sacramento, San Diego, San Francisco, Santa Ana, Seattle, Shelby County (TN), St. Louis, St. Paul, Toledo, and Wichita. No data were collected on New Orleans.

Student Testing in America’s Great City Schools

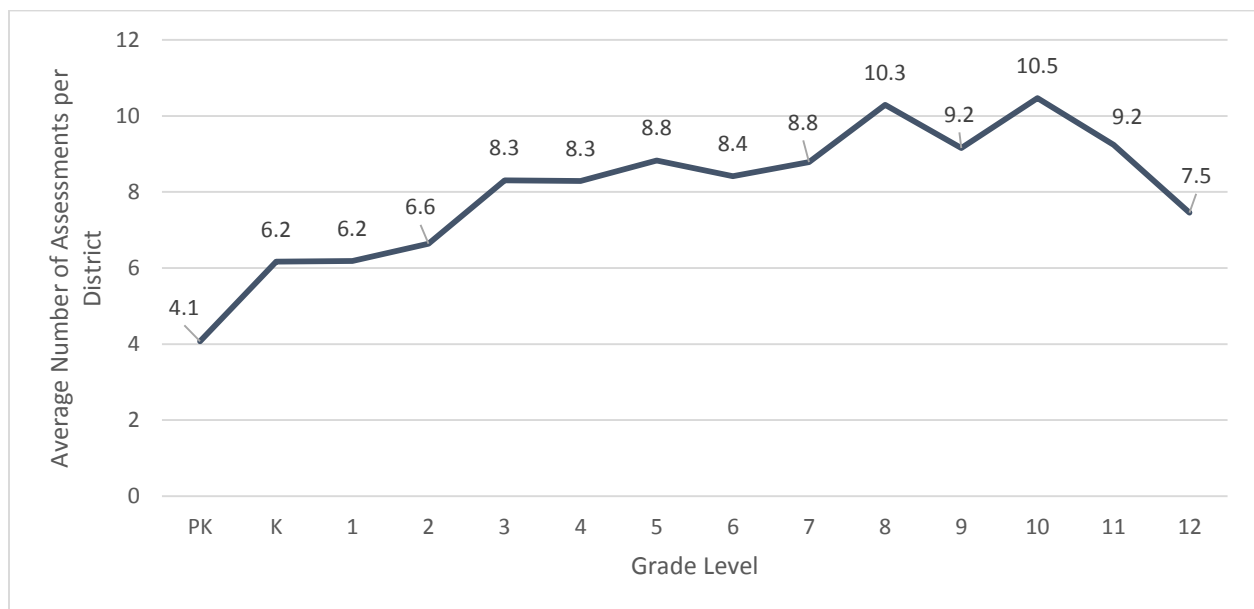
have taken the average number of assessments for the year. The largest numbers of tests are required in grades eight and ten; and smallest number of tests are required in pre-K, kindergarten, and grade one. In general, the number of required tests is highest in the secondary grades and lowest in the early elementary grades.

The findings are clear: a considerable number of tests are being administered in big-city public school districts—and probably in other school districts as well (although we have little data by which to compare the numbers of tests in suburban, rural, or small-town school systems—other than that associated with state-required testing of all districts in a state). Some of the tests that are counted here are administered to fulfill requirements under NCLB, Race-to-the-Top, or NCLB waivers, or they originate at state or local levels. But tests in this category are required for all students in a given grade. For a fuller discussion of the roles of Congress and the U.S. Department of Education in testing, see Appendix A.

In addition, the data are clear that testing in grades three through five is universal across all cities. Testing in pre-K to grade two is less prevalent, but survey results indicate that testing at these grade levels is still common. Tests in these earlier grades are typically selected at the district level, and they vary in type across districts within the same state.

The survey findings also indicate that assessments in grade eight may be much more prevalent than tests in earlier grades since students in this grade may be tested as a result of both NCLB requirements and various science, writing, technology, end-of-course (EOC), high-school placement, and other required exams. Students in grade 12, on the other hand, are more likely to be taking tests that are optional.

Figure 1. Average Number of Total Assessments per District Mandated for All Children by Grade Level



Student Testing in America’s Great City Schools

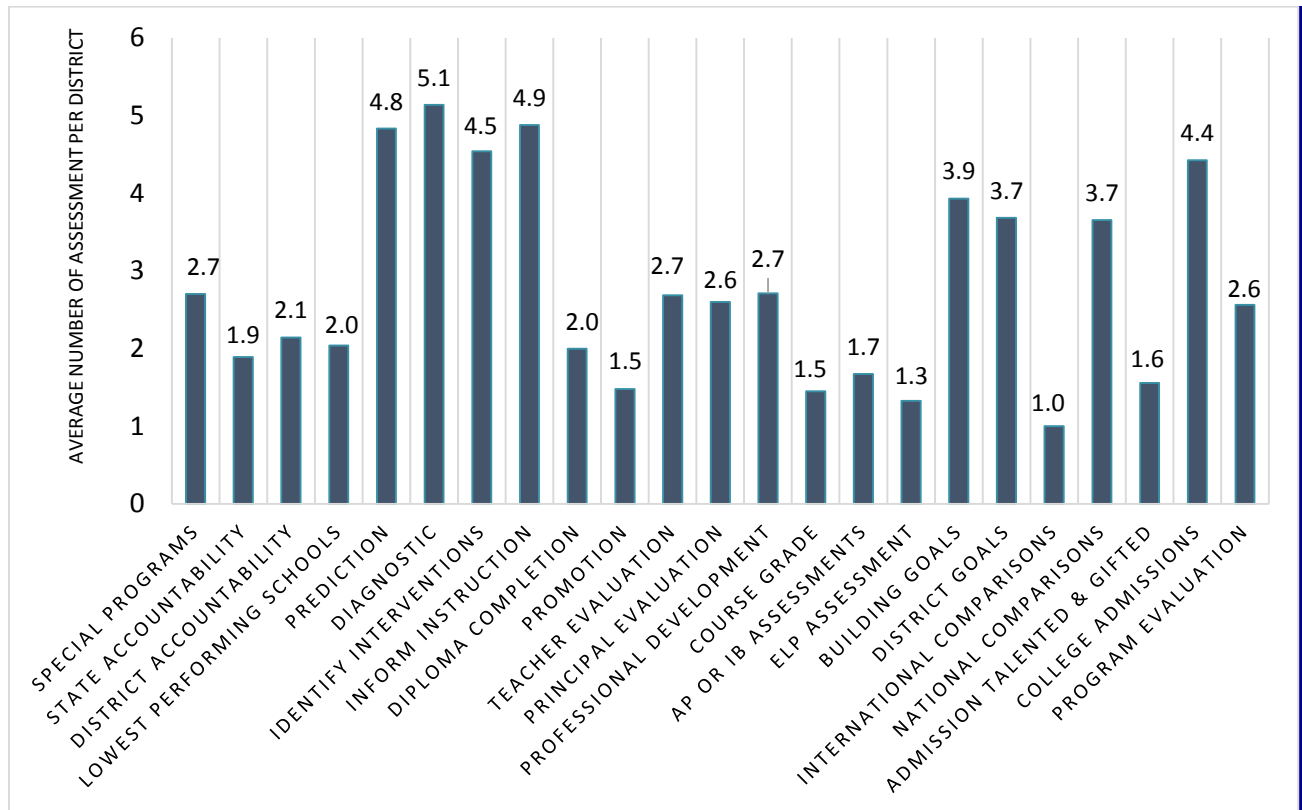
Figure 2 shows the average number of assessments that are required for all students across grades by type of use. In general, districts have more mandated tests that are used for the purposes of diagnostics, informing instruction, prediction, and to identify the need for instructional interventions than for other purposes.

In contrast, districts use fewer required tests for identifying students for gifted and talented programs, making international comparisons, determining English language proficiency, measuring Advanced Placement or IB attainment, setting course grades, or deciding grade promotions. In addition, districts reported having between two and three required tests they use for teacher and principal evaluations.

We should be clear that the number of required tests used for a particular purpose does not necessarily indicate that that purpose has a higher or lower priority—or that the state or district is using the test appropriately. There were a number of instances where districts used standardized assessments for purposes other than what they were designed for.

The number of tests used for a particular purpose may simply reflect the number of available tests. For instance, districts report having an average of only 1.33 tests to assess English language proficiency (ELP). This may be due to the fact that there are not a large number of standardized tests on the market that could be required for this purpose or that they are simply using the one test that the state requires according to federal law.

Figure 2. Average Number of Assessments Mandated for All Children by Type of Use



Student Testing in America’s Great City Schools

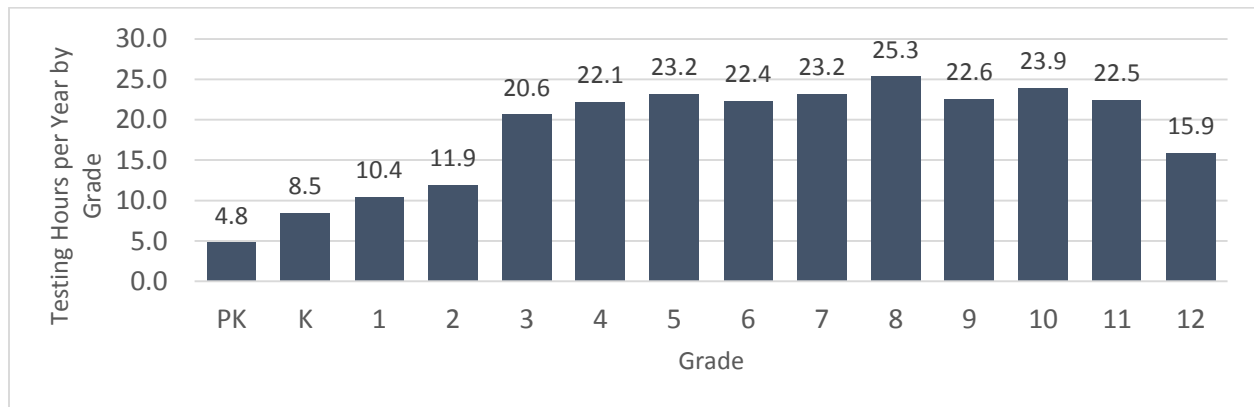
Moreover, districts may have tests for particular purposes, but it doesn’t necessarily mean that school staff or teachers use the results in the way that districts think. A study conducted by the Council and the American Institutes for Research (2012) found that use of test data can be positively correlated with improved test scores, but that the data were not always used. In general, we found that data generated from testing was not always extensively used.

Figure 3 presents data on the average amount of testing time in hours that is devoted to all mandated tests at each grade level. The amount of testing time accelerates significantly in grade three, consistent with requirements under NCLB, and remains high through grade 11. In general, students will devote between 20 and about 25 hours a year to taking mandated standardized tests. This number of hours constitutes about 2.34 percent⁵ of total instructional time for the average eighth grader (not counting sample, special, or optional assessments).

Again, these figures do not include time for tests that are given to a sample of students or that are optional. They also do not include tests that are designed for special populations or tests that were designed or acquired at the school level by principals or individual teachers. Finally, the testing times do not reflect the amount of time devoted to getting teachers and/or students prepared (i.e., test prep) for the exams.

We should also note that many of these required exams will be administered in a two- to three-month period in the second semester of the school year and will overlap with optional tests, various sample tests, some special population tests, and some school-based tests. For example, there were a number of cases in 2014-15 where PARCC and NAEP (a sample test) were being administered at the same time to the same students. This means that the time devoted to testing in the second half of the school year will be much higher than the percentage across the entire school year would suggest.

Figure 3. Average Testing Time in Hours Per Year for All Mandated Assessments for the Population of Students at Each Grade Level



⁵ This number is calculated by taking the total testing hours in eighth grade (i.e., 25.3 hours) and dividing it by a six-hour school day. The result (i.e., 4.22 days) is divided by a 180 day school year.

Student Testing in America's Great City Schools

Finally, the amount of time that is devoted to testing depends in part on the types of items on the tests themselves. For that reason, the reader will find data on item types in the subsequent sections. For example, some tests include only multiple-choice items, which require less time to administer; some tests make extensive use of extended-response questions or long-form writing tasks, which require more time. The mix of item types on standardized tests continues to undergo substantial changes from year to year as educators attempt to gauge what students grasp and what they do not. In addition, the increasing call for student performance measures, multiple measures, and portfolios of measures affects testing time and the number of tests that are administered.

A. Specific Categories of Mandated Assessments

We now look at these mandated tests according to the subcategories described in the methodology section, i.e., state summative tests, end-of-course exams, formative assessments, student learning objectives, and other mandated tests. (See Appendix B.)

1) State Tests Administered in Grades Three through Eight and Once in High School Pursuant to NCLB

All 66 of the urban school districts (100 percent) surveyed administer summative state exams as a result of requirements approved by Congress in the 2001-02 reauthorization of ESEA known as NCLB. (See Appendix A.) The federal law mandates that all states assess students annually in reading and mathematics in grades three through eight and once in high school. The law also required states to administer a science test at least once in grade bands three through five, six through eight, and once in high school. These tests are commonly used for federal, state, district, and school accountability purposes.

In addition, many states and districts use these assessments as a factor in annual teacher and/or principal evaluation systems; to identify school or district priority status; compute district, school, and/or teacher value-added measures; or make student promotional decisions at certain grade levels.

Neither Congress nor the U.S. Department of Education mandates which test will be given by each state or school district. Instead, the state determines which instrument it will give to meet the NCLB requirements. The U.S. Department of Education did, however, fund the development of new PARCC and SBAC tests to assess student attainment on the common core standards but did not require that they be used.

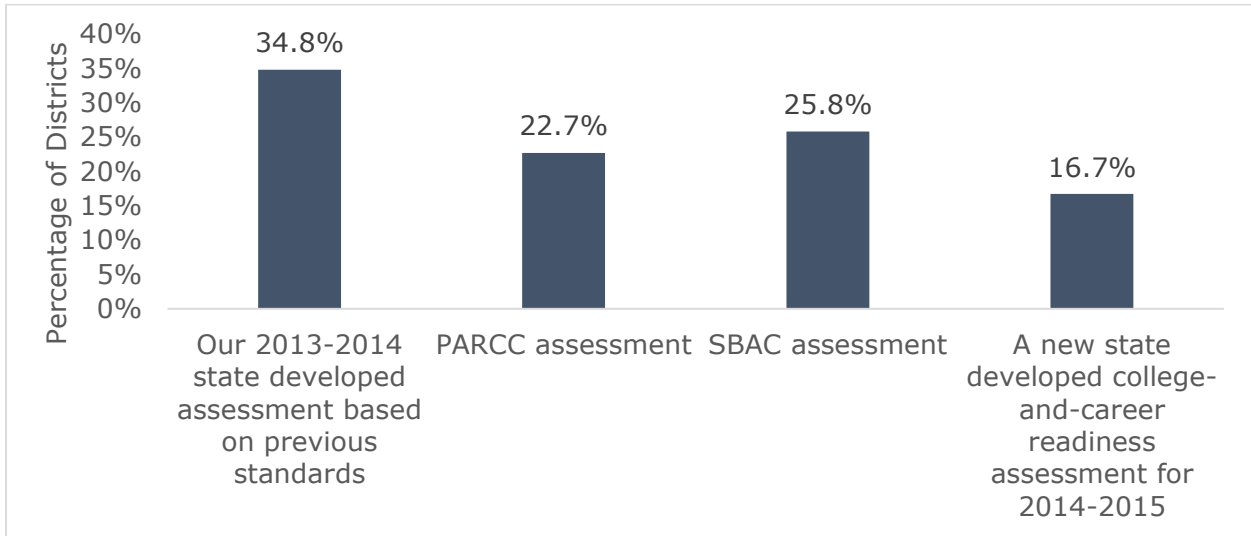
Results of the Council's survey indicate that most major city school districts administered either PARCC or SBAC as part of their NCLB requirement during the 2014-15 school year. Nearly a quarter (22.7 percent) of Council districts administered PARCC assessments and 25.8 percent administered SBAC assessments in the spring of 2015. Another 34.8 percent administered the same statewide assessment they had administered in the 2013-14 academic year (e.g., Texas and Virginia). And the remaining 16.7 percent of districts administered a new state-developed or

Student Testing in America's Great City Schools

purchased college- and career-ready (CCR) assessment in the 2014-15 school year (e.g., Georgia and Florida).

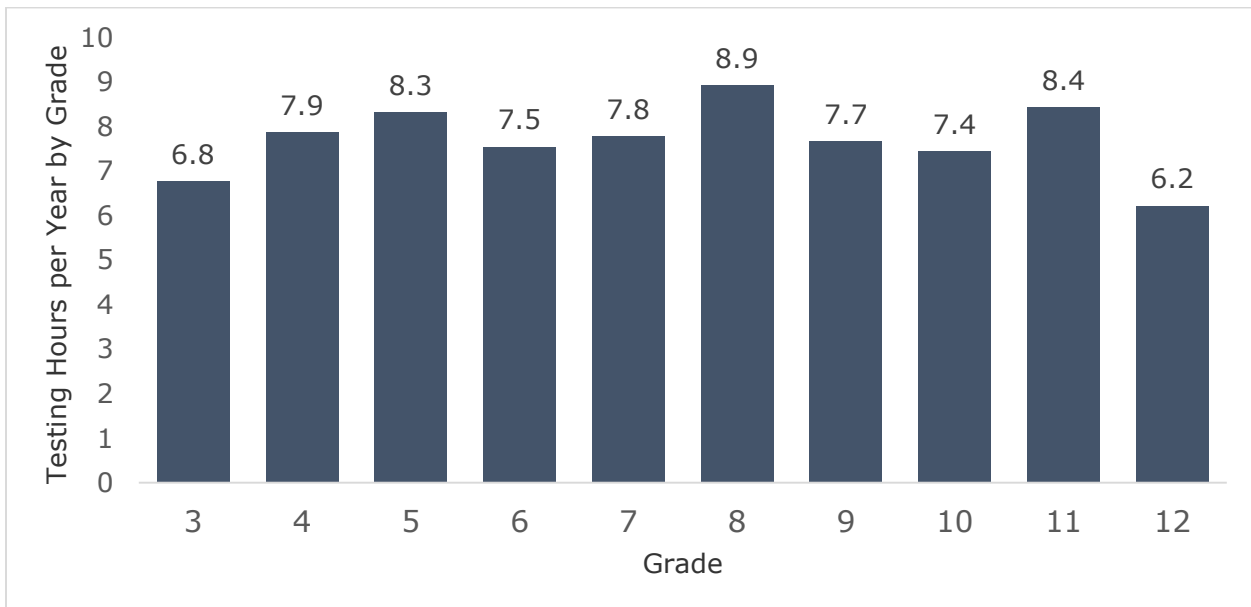
In other words, there was substantial variation in which state assessments were administered this past school year in the 66 urban school districts that are the focus of this study. (See Figure 4.)

Figure 4. State Tests Administered in Grades 3-8 and in High School in the 2014-15 Academic School Year Pursuant to NCLB



The Council also determined the amount of time that was devoted to these NCLB-required exams in each grade in the 2014-15 school year. The results are shown in Figure 5.

Figure 5. Average Testing Time in Hours per Year for All PARCC/SBAC/Other State NCLB Assessments at Each Grade Level



Student Testing in America's Great City Schools

The data indicate that students in the major urban school districts spent between 6.2 hours and 8.9 hours taking these assessments during the last school year, depending on their grade. In other words, about a third of the time students were taking required exams, it was due to NCLB.

Testing time specifically for SBAC and PARCC is shown in Table 1 below.

Table 1. Estimated Testing Times for SBAC and PARCC

Estimated testing times for SBAC						
Subject	Grades	CAT	Performance Task Only	Total	Class Activity	Total
English Language Arts	3-5	1:30	2:00	3:30	:30	4:00
	6-8	1:30	2:00	3:30	:30	4:00
	11	2:00	2:00	4:00	:30	4:30
Mathematics	3-5	1:30	1:00	2:30	:30	3:00
	6-8	2:00	1:00	3:00	:30	3:30
	11	2:00	1:30	3:30	:30	4:00
Combined	3-5	3:00	3:00	6:00	1:00	7:00
	6-8	3:30	3:00	6:30	1:00	7:30
	11	4:00	3:30	7:30	1:00	8:30

Note: CAT is computer-adapted test.

Estimated testing times for PARCC							
Subject	Grades	PBA Unit 1 (LA)	PBA Unit 2 (RS)	PBA Unit 3 (NW)	EOY Unit 1	EOY Unit 2	Total
English Language Arts	3	1:15	1:15	1:00	1:15		4:45
	4-5	1:15	1:30	1:00	1:15		5:00
	6-11	1:15	1:30	1:00	1:00	1:00	5:45
		PBA Unit 1	PBA Unit 2		EOY Unit 1	EOY Unit 2	
Mathematics	3	1:15	1:15		1:15	1:15	5:00
	4-5	1:20	1:10		1:15	1:15	5:00
	6-8	1:20	1:10		1:20	1:15	5:05
	Algebra I, Geometry	1:30	1:15		1:20	1:15	5:20
	Algebra II	1:30	1:15		1:30	1:15	5:30
Combined	3	2:30	2:30	1:00	2:30	1:15	9:45
	4-5	2:35	2:40	1:00	2:30	1:15	10:00
	6-8	2:35	2:40	1:00	2:20	2:15	10:50

Student Testing in America’s Great City Schools

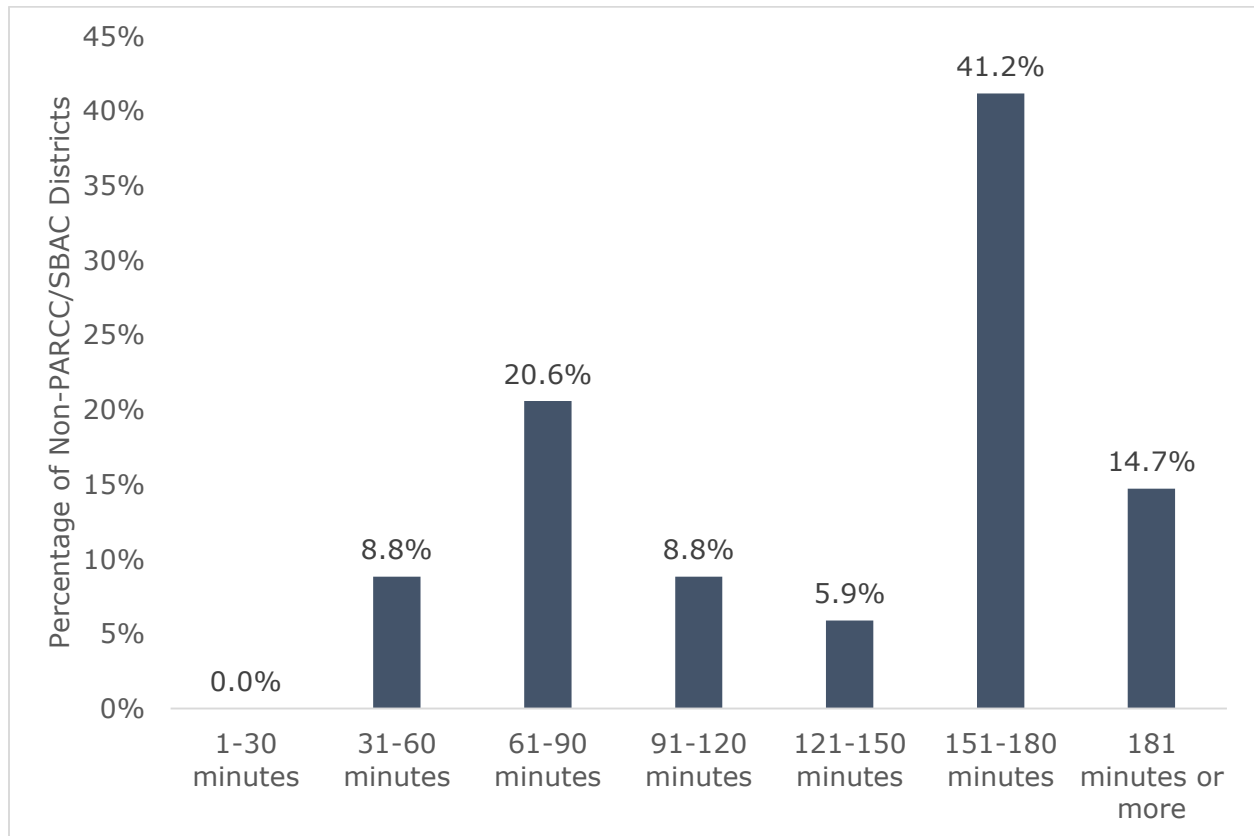
	Algebra I, Geometry	2:45	2:45	1:00	2:20	2:15	11:05
	Algebra II	2:45	2:45	1:00	2:30	2:15	11:15

NOTE: PBA is performance-based assessment; EOY is end of year; LA is literary analysis; RS is research simulation; and NW is narrative writing.

The Council also looked at the amount of time that students were involved in taking NCLB-required exams other than PARCC or SBAC exams, i.e., the previous year’s exam or a new state-developed or purchased exam. Figure 6 shows the results.

The data indicate that most of the state exams administered pursuant to NCLB took either between an hour and an hour-and-a-half or between two and two-and-a-half hours. Only about 14.7 percent of the districts administered exams that were as long as three hours. In other words, few of these state-developed or acquired exams were as time-consuming as the PARCC or SBAC exams were in 2014-15.

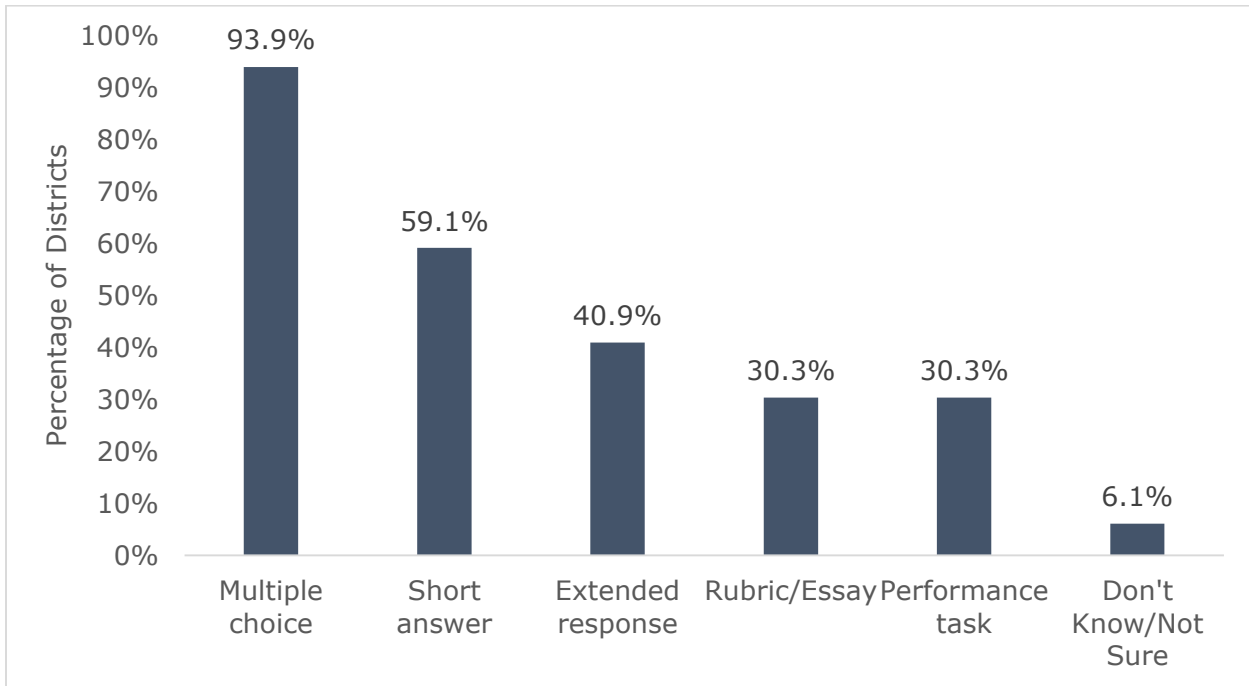
Figure 6. Time Allotted for General Education Students to Complete State-Developed NCLB Assessments (Excluding PARCC/SBAC)



The Council also asked its school districts to specify what types of items were being used on these NCLB-required state exams. The results are shown in Figure 7. Some 94 percent of districts reported that their state tests given pursuant to NCLB contained multiple-choice items.

Student Testing in America's Great City Schools

Figure 7. Item Types for All PARCC/SBAC/Other State NCLB Assessments



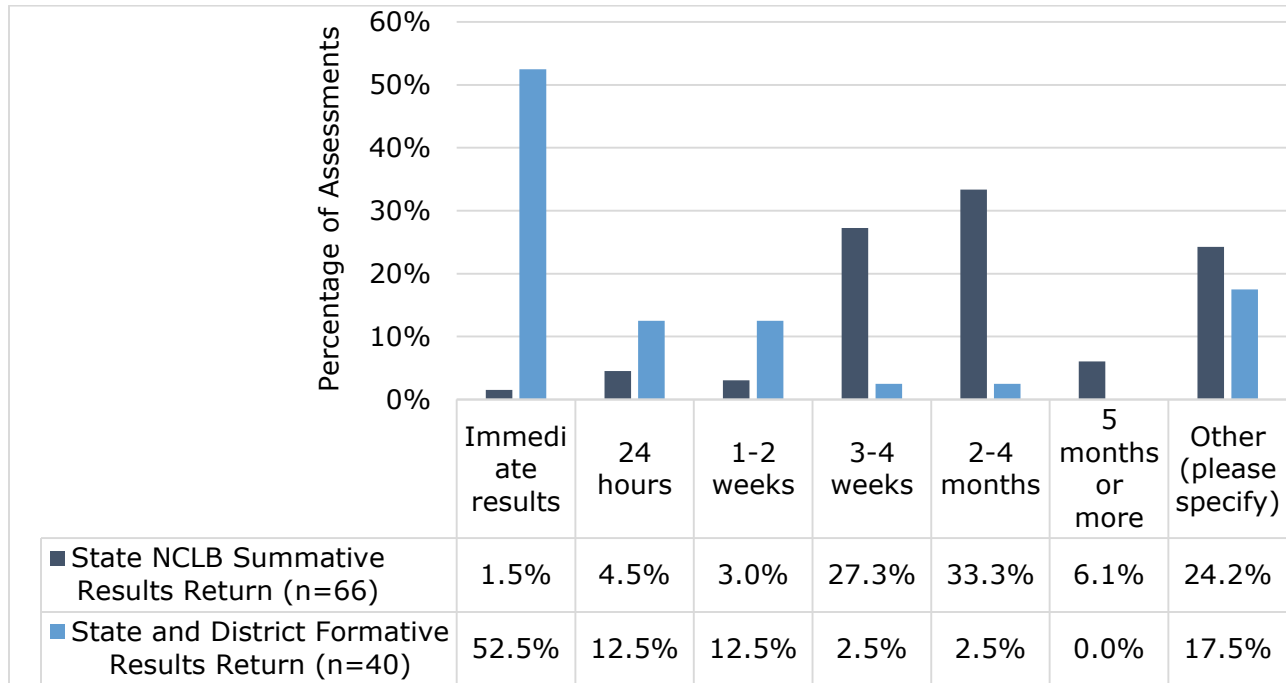
In addition, 59.1 percent of districts reported that their state exam included short-answer questions, and 40.9 percent indicated that their state exams included extended-response items. Over 30 percent of the districts indicated that their state tests included essays or performance tasks in 2014-15. While we do not have firm data on this point, we suspect that the inclusion of items other than multiple-choice questions on state tests has increased in recent years.

In addition, we should note that parents and the public have asked for better, high-quality assessments that include the kind of performance tasks and extended-response questions that PARCC, SBAC, and some new state exams are now offering. Historically, we have made a trade-off between higher-quality items that may require more time and lower-quality multiple-choice items that were cheaper to score and required less time. PARCC, SBAC, and other similar tests were designed to rebalance those scales toward higher quality.

We also asked districts to indicate how long it took states to return results of the NCLB summative assessments to districts and how long it took the districts to turn around the results of formative assessments to schools (discussed in a subsequent section). The districts reported that it typically took states between two and four months to return results of the NCLB summative tests, while about half of the districts reported that they were able to turn around state and local formative results immediately. (See Figure 8.) The reader should keep in mind that state summative tests, including PARCC and SBAC, were new in 2014-15 and that the return rate for these tests would be shorter in subsequent years.

Student Testing in America's Great City Schools

Figure 8. Return Rate for State and District NCLB and Formative Assessment Results



Finally, the data also indicated that continuing changes in testing practices at the state level was adding to the inability of school districts to track and evaluate their reforms. Between 2011 and 2014, some 46 percent of all state-mandated summative tests administered in the 66 districts changed in a way that prevented those districts from tracking student achievement over an extended period. In 2015, because of the advent of new college- and career-ready tests, the state summative assessments in 65 percent of the city school systems had changed. In other words, there were almost no tests in 2015 that had also been given in 2011.

2) End-of-Course Assessments

Some 47 of the 66 urban school districts on which we have data—or 71.2 percent—administer end-of-course assessments (EOCs) in one or more subjects.

These exams are normally given at the end of the school year, usually in the secondary grades, to measure student attainment in a particular course or to assess mastery of specific subject material. Courses in which EOCs are given typically include English literature (particularly in ninth and tenth grades), Algebra I, Algebra II, geometry, physical science, biology, chemistry, and American history, among other courses.

Districts sometimes administer EOCs to ensure that students are exposed to similar material from school to school. Similarly, states may require EOCs to ensure comparable instruction in a subject across schools in a state. Teachers have been giving final exams for many decades, of course, but the new generation of end-of-course tests are typically standardized exams and are sometimes used to fulfill requirements under NCLB or NCLB waivers.

Student Testing in America's Great City Schools

Several states have included EOCs in their ESEA accountability models to fulfill NCLB requirements that students be assessed at least once in high school. Georgia, for example, replaced the Georgia High School Graduation Tests in math, ELA, science, and social studies (four assessments in grade 11) with 10 end-of-course assessments (two ELA, four math, two science, and two social studies assessments).

In other states and districts, students take both EOC exams and their state-required summative test in the same subjects. New Mexico, for example, added EOC exams but continued to require its Standards Based Assessment (SBA) for graduation. That state now requires EOCs in 41 different high school courses and a number of fourth, fifth, sixth, seventh, and eighth grade courses (math, science, social studies, ELA, etc.), although all students may not take all courses associated with an EOC. (Several are CTE courses, business courses, or visual and performing arts.) These two examples illustrate how students in both states were faced with additional high school assessment requirements during the last school year.

In addition, the use of EOC exams as part of final course grades varies considerably. Again, in Georgia and other states, EOC exams are intended to replace final examinations and they accounted for 20 percent of a final course grade. In contrast, performance on EOCs in the Albuquerque Public Schools in spring 2015 was “NOT [to] be used as a course final [exam].”⁶ Consequently, some teachers may have administered final exams to help determine grades in courses that also had EOC exams.

The charts below show district responses on EOC features (Figures 9-13). The data indicate that districts having EOC exams administer an average of 2.5 math exams in their secondary grades, 1.9 English exams, 1.8 science tests, and 1.7 social studies exams. (See Figure 9.)

The Council survey also asked districts about the types of questions or items that the EOC exams included. Some 98 percent (97.9 percent) of districts reported that their EOC exams had multiple-choice items—about the same percentage of districts reporting that their state summative assessments had multiple-choice items.

Moreover, 66 percent of districts reported that their EOC tests included short-answer questions, a level that was somewhat higher than the number of districts reporting that their state summative assessments had short-answer questions. (See Figure 10.)

About forty-nine percent (48.9 percent) of districts indicated that their EOC tests had extended response items, compared to 40.9 percent of districts reporting that their state assessments had such items. Just over half (51.1 percent) reported that their EOC exams had essay questions, and 40.4 percent reported that their EOCs had performance tasks, compared to 30.3 percent of districts

⁶ Albuquerque Public Schools (March 18, 2015) End of Course Exam Guide for Spring 2015. The Assessment and Testing Department of Organizational Accountability and Reporting, page 26. Retrieved from <http://www.aps.edu/assessment/eoc-documents-folder/eoc-guidelines-spring-2015>

Student Testing in America's Great City Schools

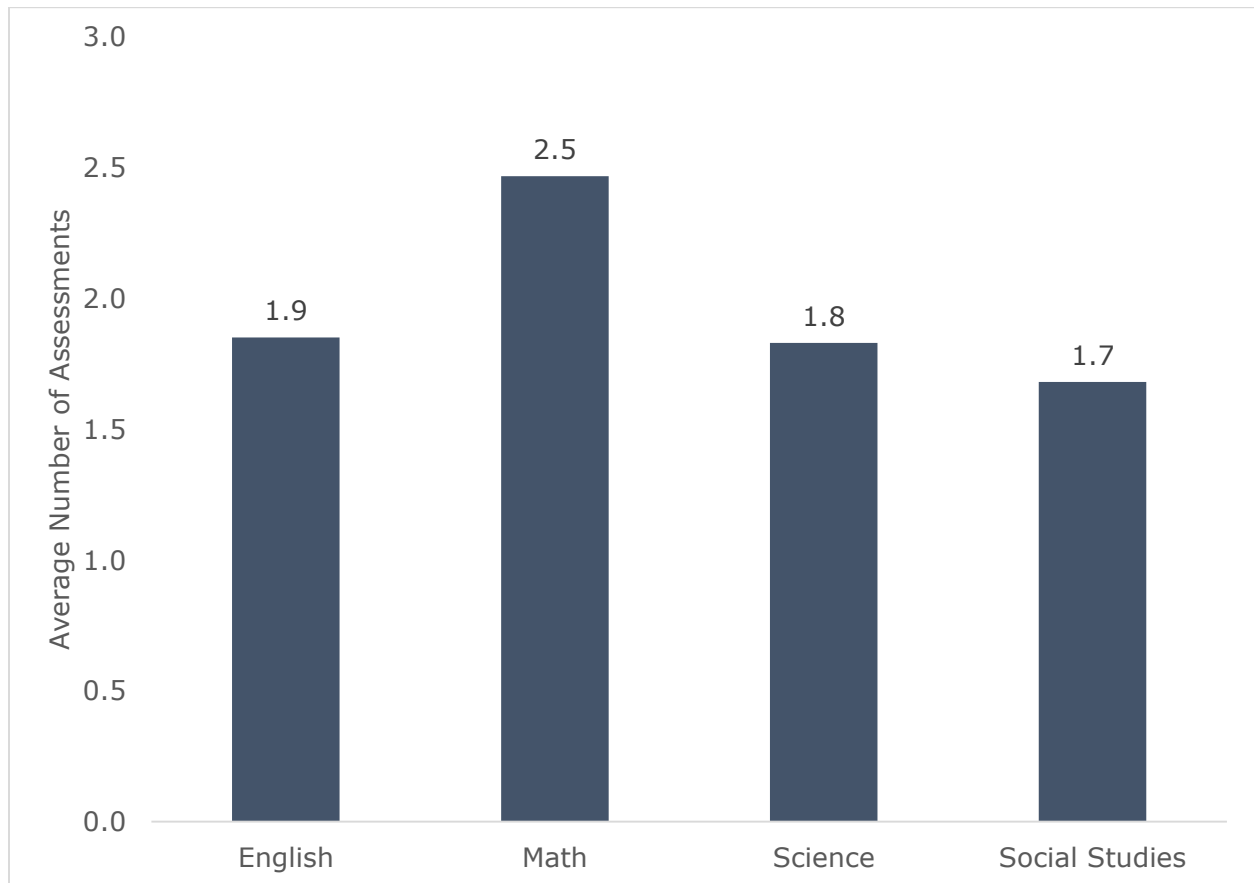
reporting that their mandated state exams had such items. In other words, more districts reported that their EOC tests made greater use of items other than multiple-choice questions than did their mandated state tests.

Districts were also asked about the length of the EOC exams they administered. Some 34 percent of districts reported that their EOCs were between an hour and an hour-and-a-half in length; 23.4 percent indicated that the EOCs were an hour-and-a-half to two hours in length; and 23.4 percent reported that their EOCs were three hours or more in length. (See Figure 11.)

Of course, the total amount of time spent on EOCs varies by grade. Figure 12 presents the average number of hours students spent taking EOCs at each grade in high school—a number that is highest for ninth-grade students and decreases each year as students progress toward grade 12. (See Figure 12.)

Finally, three quarters (74.5 percent) of districts with EOCs report that results of these exams factor into their state accountability systems as a result of NCLB waivers. (See Figure 13.)

Figure 9. Average Number of Secondary-grade Level EOCs by Subject Area (in Districts Having EOCs)



Student Testing in America's Great City Schools

Figure 10. EOC Item Types

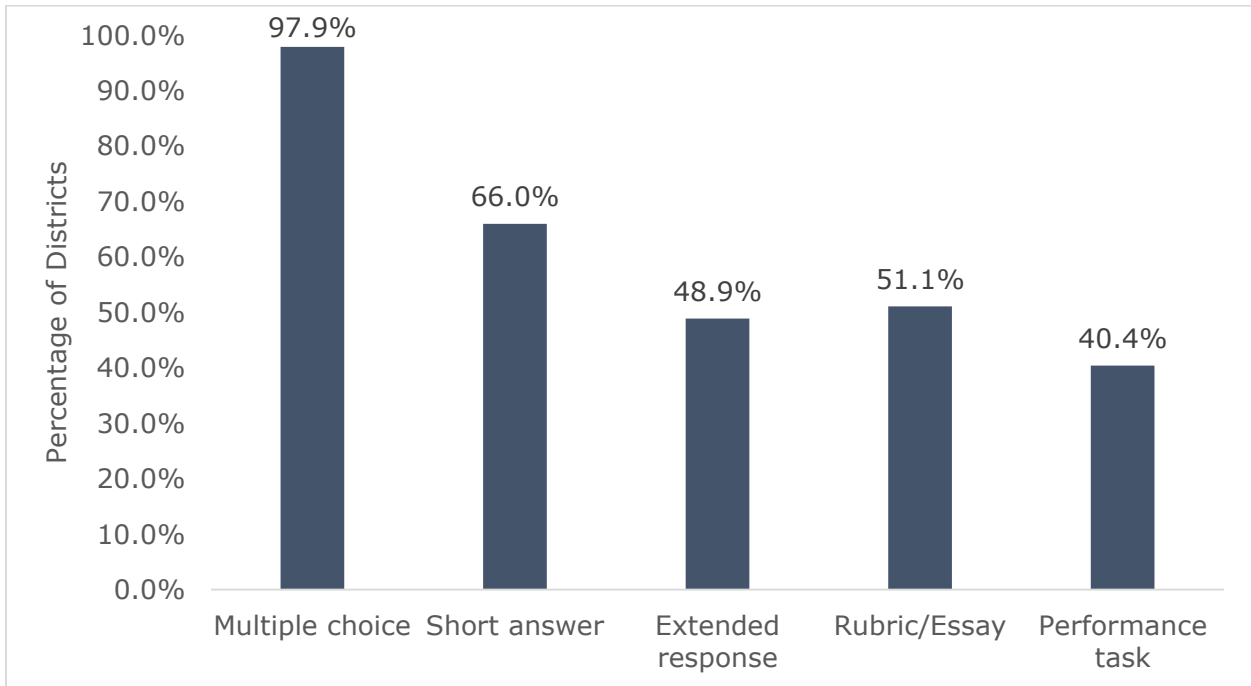
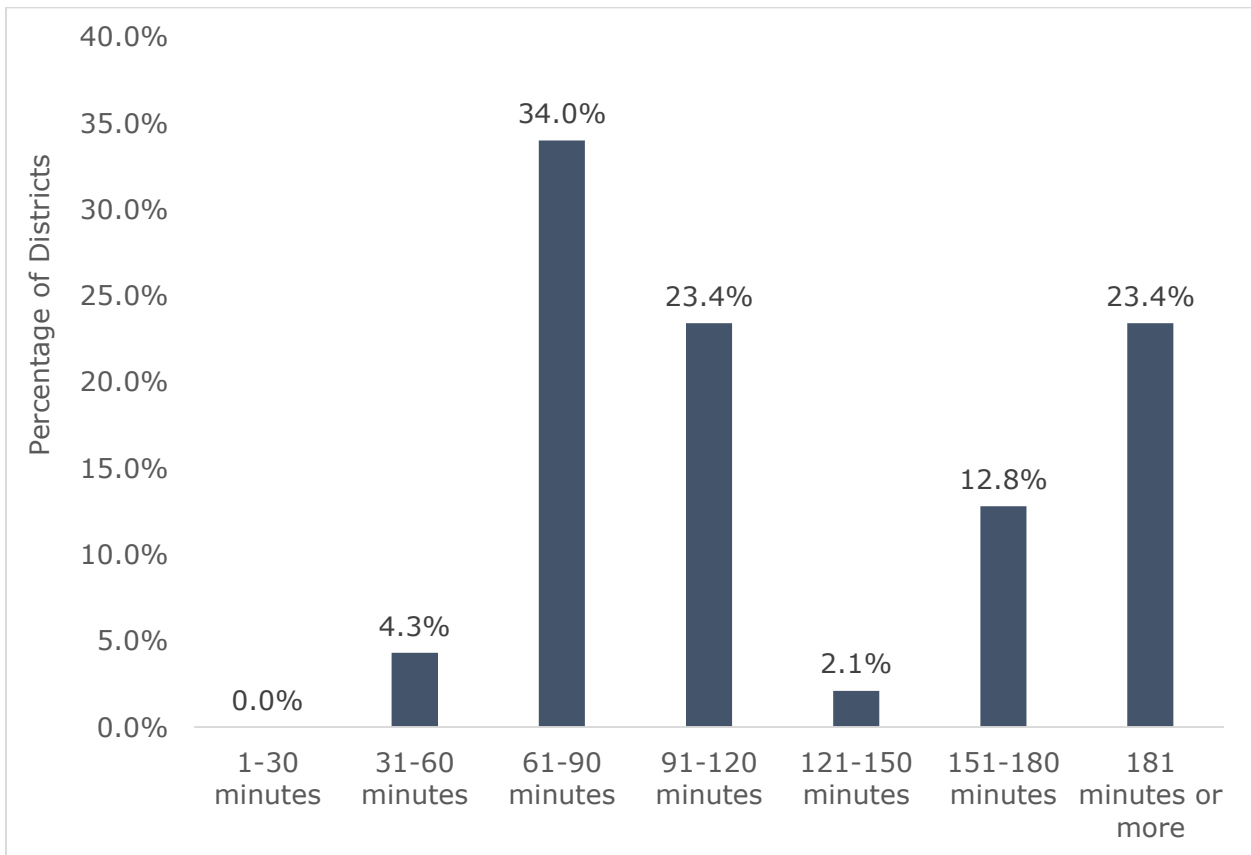
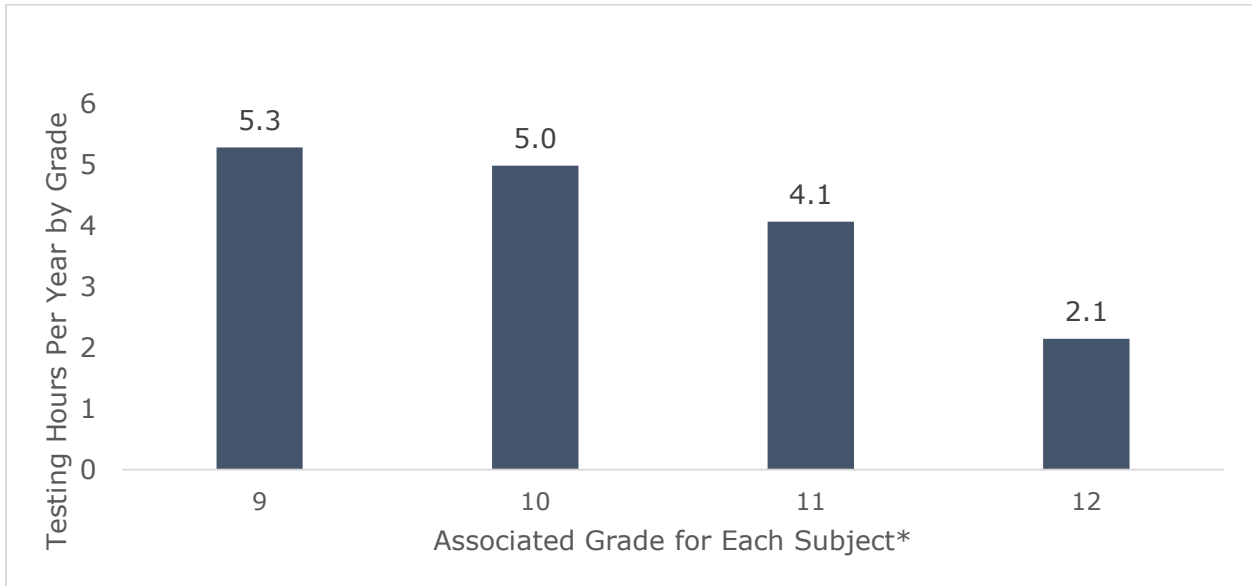


Figure 11. Time Allotted for General Education Students to Complete EOC Assessments



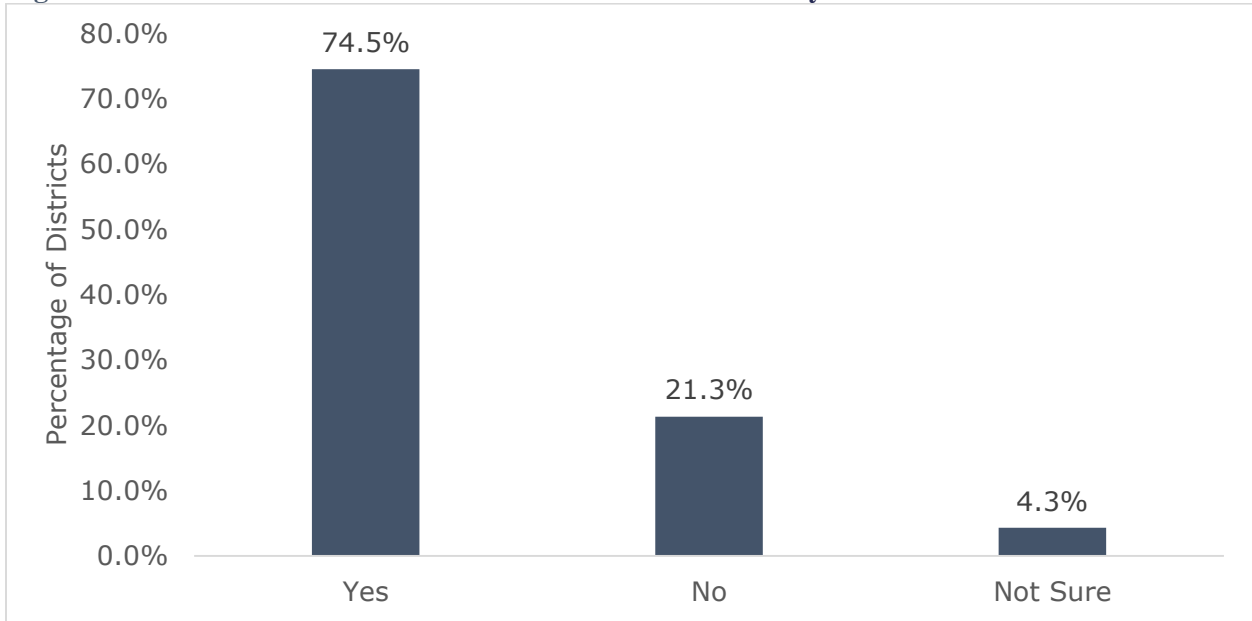
Student Testing in America's Great City Schools

Figure 12. Average Testing Time in Hours per Grade for EOC Assessments



*Note: EOC exams are given by course not by grade, but courses were associated with a typical grade in which the course is taken. For example, Algebra I is associated with grade 9.

Figure 13. EOC Assessments Included in State Accountability as a Result of NCLB Waivers



3) State and District Formative Assessments

In addition to mandated state summative exams and EOCs, many urban school districts (59.1 percent) reported that they administered districtwide formative assessments over the course of the 2014-15 school year that were mandated by either the state or the district. Some districts also administered formative assessments that were mandated by the state for some students or grades, and by the district for other students or grades.

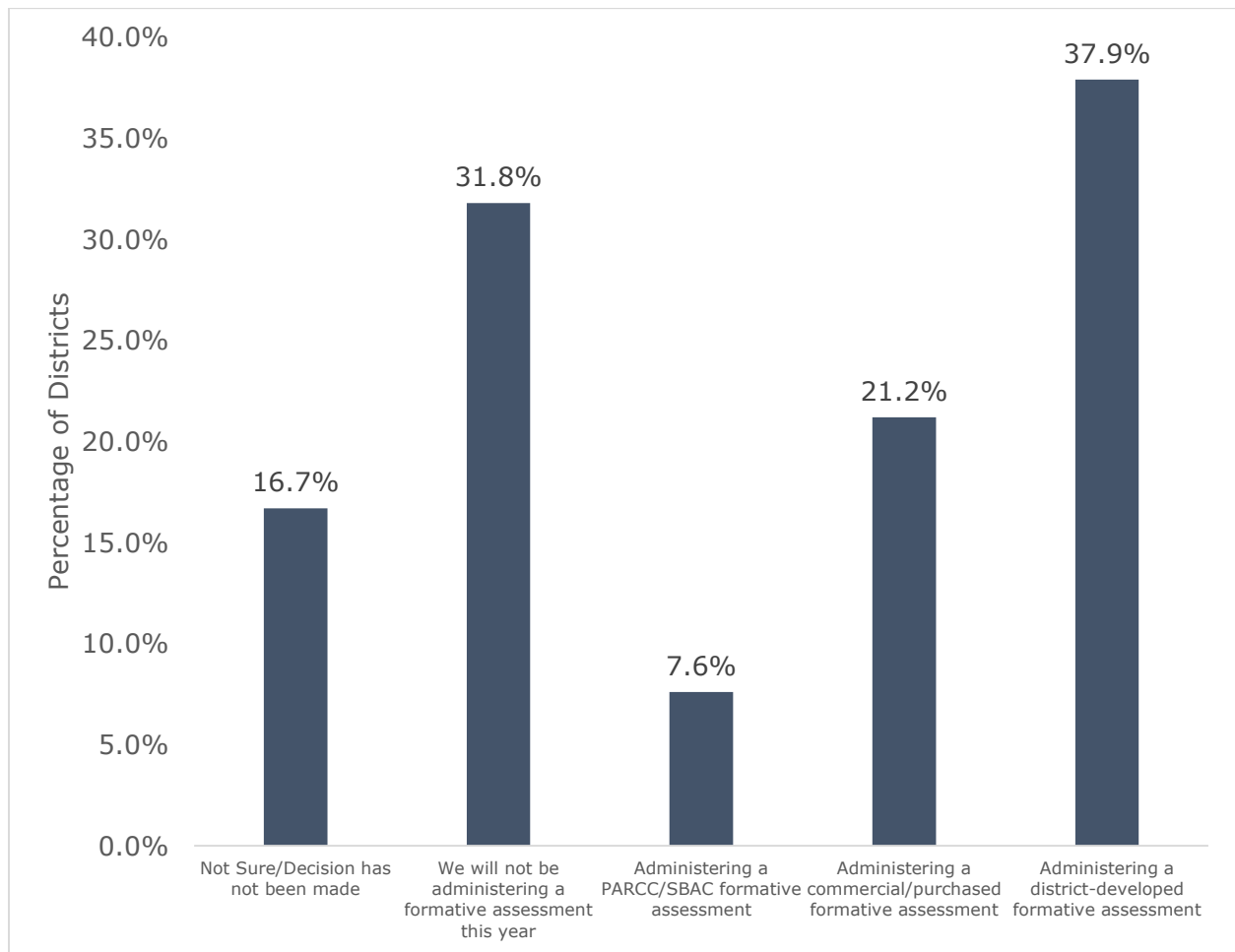
Student Testing in America’s Great City Schools

Some 37.9 percent of the districts reported that they developed the formative exams themselves—sometimes on their own and sometimes based on a state requirement. In addition, some 21.2 percent of the districts reported using a commercially developed formative test, and 7.6 percent reported using one of the PARCC or SBAC formative tests. (See Figure 14.) Some of these formatives were part of state applications for U.S. Department of Education waivers to NCLB or Race-to-the-Top grants.

It was clear from interviews with district staff that some districts elected to make formative assessments optional this school year as a result of the transition to new college- and career-ready tests. However, almost all districts indicated that these formative assessments might be reinstated for students and schools in the 2015-16 school year once alignment to the new standards is complete.

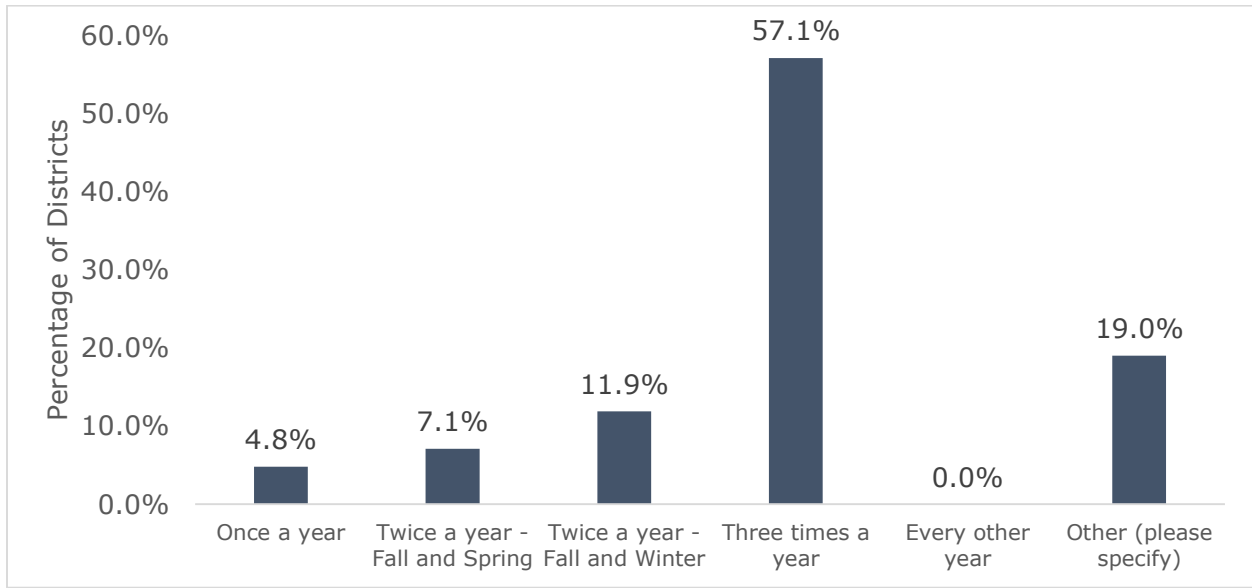
In addition, almost half of the districts administering formative assessments gave them three times during the school year. (See Figure 15.)

Figure 14. Districtwide Formative Assessment Administration



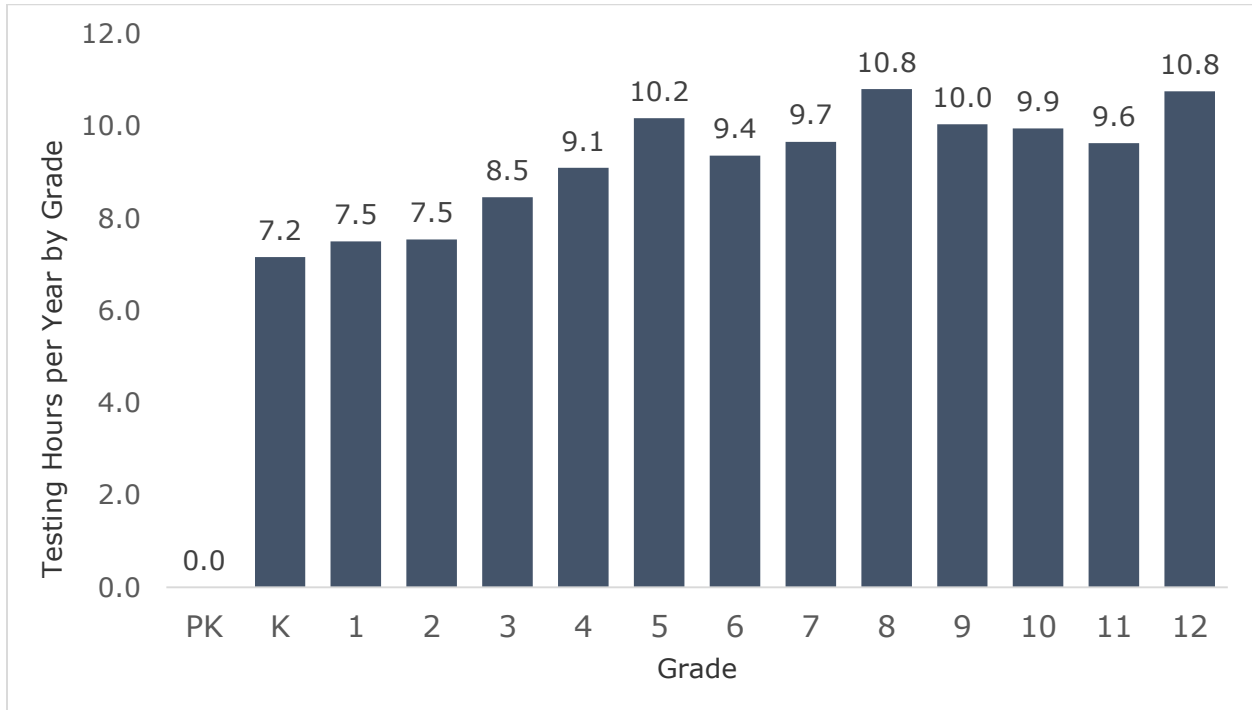
Student Testing in America's Great City Schools

Figure 15. Frequency of Formative Assessments



Finally, the data show that considerable testing time was devoted to formative assessments in the 2014-15 school year. On average, students spent between 7.2 hours and 10.8 hours last school year taking formative assessments, depending on the grade. (See Figure 16.) The amount of time devoted to these exams appeared to depend more on the number of times the tests were given over the course of the school year than on the number of tests *per se*.

Figure 16. Average Testing Time per Year for Formative Assessments Mandated for All Students at Each Grade Level



Student Testing in America's Great City Schools

4) Student Learning Objectives (SLOs)

Some 37.9 percent, or 25 of the 66 districts on which we have data, reported implementing SLO assessments in non-NCLB-tested grades and subjects in the 2014-15 school year, over and above state summative tests, formative exams, and EOC tests.⁷

According to the Race-to-the-Top Reform Support Network SLO toolkit, student learning objectives (SLOs) or value-added tests began in 1999 in the Denver Public Schools as a measure of student growth in its pilot teacher performance-pay system in tested and non-tested grades and subjects.⁸ The tool kit also indicates that states and districts did not use SLOs as a component in educator-evaluation systems until first- and second-round winners of the U.S. Department of Education's Race-to-the-Top grant were "required to implement teacher evaluation systems that differentiate effectiveness."

The toolkit explains that "while many winning states could point to their growth measures for teachers in tested grades and subjects, they had little or nothing to measure the performance of teachers of non-tested grades and subjects (for example, kindergarten, first-grade and second-grade teachers; special education, music and art teachers; and physical education, career, technical, social studies, and science teachers)."

A considerable number of states and districts have therefore elected to implement student learning objectives to meet these perceived requirements. (See Appendix A.) These tests are often included in state waiver applications to the U.S. Department of Education, and are normally developed by teachers themselves, districts, technical assistance centers and consultants, states, and others. These exams are often used for teacher-evaluation purposes, are of mixed technical quality, and have resulted in a substantial amount of new testing in America's schools.

Both teachers and psychometricians have concerns about the quality of SLOs. In a survey of Rhode Island teachers, over 80 percent of respondents disagreed or strongly disagreed with the statement, "SLOs (1) provide sound evidence for measuring teacher performance, (2) contribute valuable evidence to teachers' overall effectiveness ratings, and (3) provide comparability of rigor in measuring impact on student outcomes."⁹

⁷ This study counted SLOs once per school year. Sometimes these assessments were administered once and sometimes twice as pre- and post-tests.

⁸ Reform Support Network. (2012). A quality control toolkit for student learning objectives. U. S. Department of Education. Retrieved from <https://www2.ed.gov/about/inits/ed/implementation-support-unit/tech-assist/slo-toolkit.pdf>.

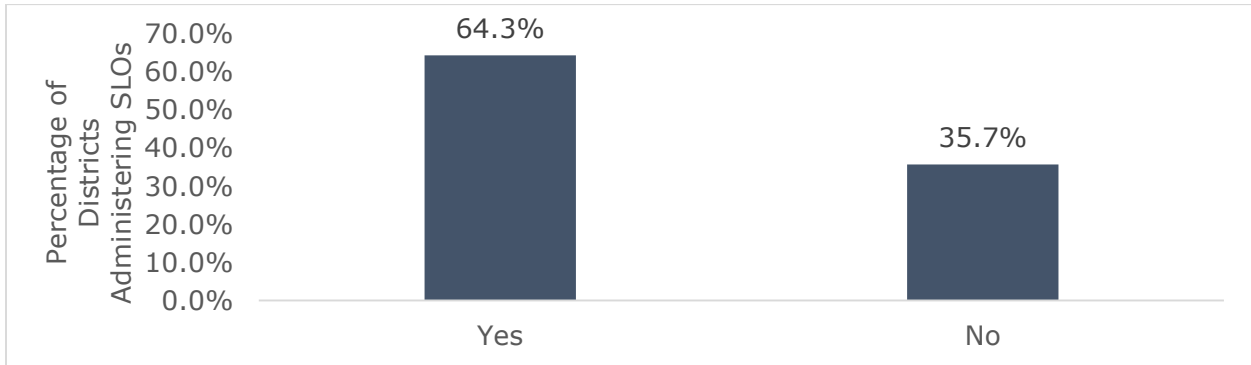
⁹ Slotnick, W. Smith, M., & Liang, G. (September 2013). Focus on Rhode Island: Student Learning Objectives and Evaluation. Boston, MA: Community Training Assistance Center. Retrieved from [/www.ctacusa.com/wp-content/uploads/2013/11/focusonRhodeIsland.pdf](http://www.ctacusa.com/wp-content/uploads/2013/11/focusonRhodeIsland.pdf)

Student Testing in America’s Great City Schools

Similarly, James Popham, a nationally recognized assessment expert, agreed that the SLO process is dependent on teachers’ ability to set and accurately measure meaningful growth targets over the course of a school year.¹⁰

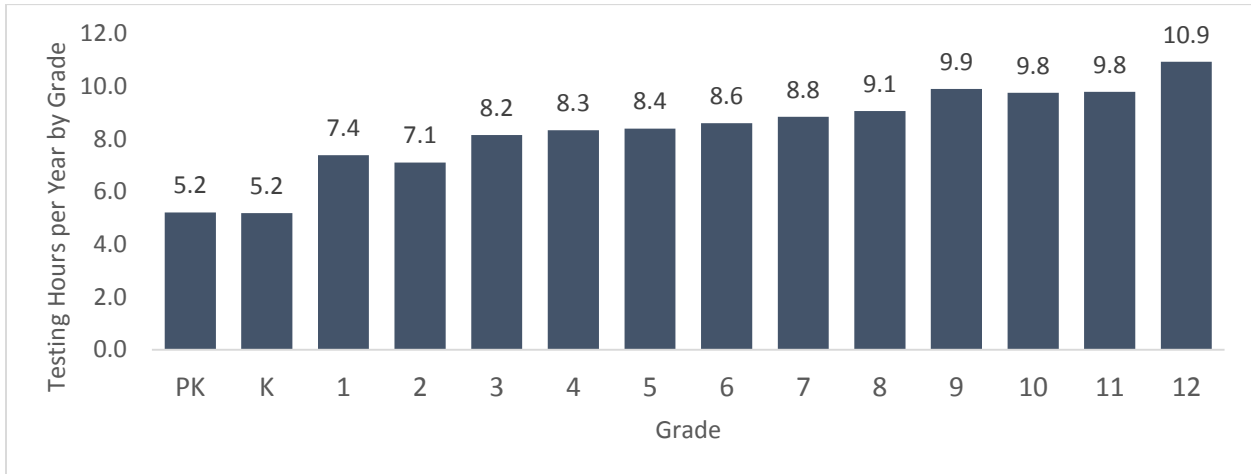
Some 64.3 percent of districts using these tests report that they were included in their state’s accountability system. (See Figure 17.)

Figure 17. SLO Assessments Included in State Accountability



In districts that administered SLOs, students devoted a substantial amount of time taking them. Students spent between 5.2 and 10.9 hours taking these exams in the last school year.¹¹ (See Figure 18.) It was also clear from the data that the number of hours students spend taking these tests is significant, even in grades where NCLB requires a state summative exam.

Figure 18. Average Testing Time per Year for SLO Assessments for the Population of Students at each Grade Level



¹⁰ Popham, J. (December 11, 2013). The Pseudo-science of evaluating teachers via a “Student Learning Objectives” Strategy. *Education Week*. Retrieved from blogs.edweek.org/edweek/finding_common_ground/2013/12/the_pseudo-science_of_evaluatinnng_teachers_via_a_student_learning_objectives_strategy.html

¹¹ These numbers were calculated on the basis of what the districts reported on the survey, but districts may not know the full extent of SLO testing because some are teacher developed.

Student Testing in America's Great City Schools

5) Other Mandated Assessments – Interim/Benchmark Tests, Nationally Normed Tests, College Entrance Exams, Pre-K Tests, and Other Assessments Required of All Students in Designated Grades

This group of exams is generally, but not always, mandated by the districts themselves for all students at a designated grade level and is in addition to state summative tests, EOC exams, formative assessments, and SLOs. The most prevalent assessments from the survey results in this mandated category included—

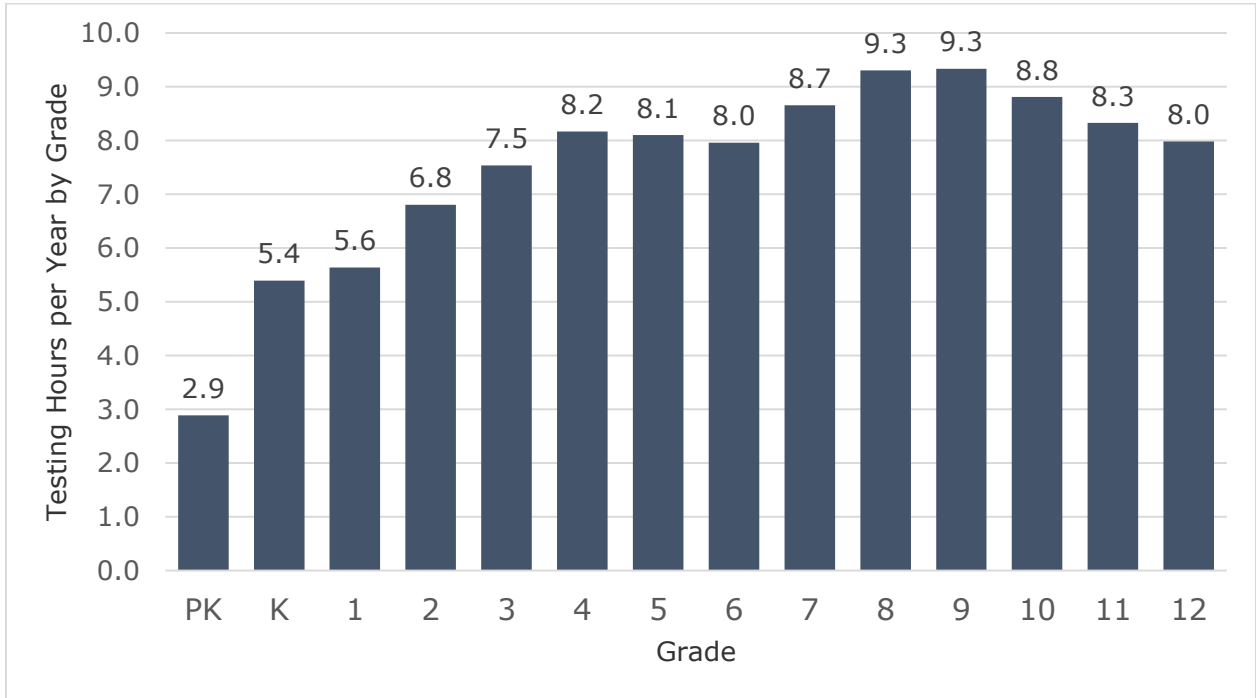
- ACT Plan
- ACT Explore
- NWEA MAP
- DIBELS
- CogAT
- ITBS
- STAR

Other instruments in this category include such norm-referenced exams as the Terranova, the SAT-10, various screening devices such as Running Records, Fountas and Pinnell, and pre-K assessments—when they are administered to everyone in a particular grade. (If these assessments are given only to a sample of students, then they are included in the next section of this report.) Districts overall report administering over 100 unique assessments in this category. (See Appendix E.)

The data collected for this project on other mandated assessments indicated that students devoted an average of between 2.9 hours and 9.3 hours last school year taking these tests, depending on the student's grade. (See Figure 19.) The amount of time increased incrementally from kindergarten up through grade four, and then held somewhat steady (even dipping slightly) until spiking up at the end of the middle-school years in grades seven and eight. In high school, testing time for these other mandated assessments started out at a high of 9.3 hours, and decreased steadily as students progressed toward grade 12.

Student Testing in America's Great City Schools

Figure 19. Average Testing Time per Year for All Other Mandated Assessments for the Population of Students at Each Grade Level



The data collected for this project indicated that there was often considerable redundancy in these exams. For example, multiple exams were sometimes given in the same subjects and grades to the same students because not all results yielded data by item, grade, subject, student, or school—thereby prompting districts to give another exam in order to get data at the desired level of granularity. We found multiple examples of students taking an EOC, an AP test, and a final exam in the same course. In one district, for example, NWEA-MAP and STAR were both given to students three times a year despite the fact that they are both computer adaptive, both administered in the same subjects, and likely yielded comparable information on the same students.

Some of this redundancy is the result of aggressive salesmanship on the part of testing vendors. And some of the inconsistency in testing at the local level can occur when a state or district requires a particular test, but principals and/or teachers in a school decide they want to administer something else.

There were also a number of instances where districts used standardized assessments in this category for purposes other than what they were designed for. And our review suggests that some mandatory tests are not well aligned to each other and are not aligned with any college- or career-ready standards. In fact, many nationally normed exams were developed prior to the creation of college- and career-ready standards. For example, the Stanford 10 uses 2007 norms and was built on earlier standards and the Iowa Test of Basic Skills uses 2005 norms and has a 2007 copyright. Most computer-adaptive assessments such as the NWEA's Measures of Academic Progress

Student Testing in America’s Great City Schools

(MAP), Scholastic’s Reading and Math Inventories, and Renaissance Learning’s STAR assessments mapped their old testing blueprints onto new college- and career-ready standards or linked their test scores to new college- and career-ready expectations by using Lexile levels, equi-percentile equating, or other statistical procedures. In each of these examples, however, the development of the assessments were not based on the new standards themselves. It should also be noted that many of these mandated exams do not actually test a student’s knowledge on any particular content area.

Finally, the Council’s survey also included questions about district use of pre-K assessments, and many of the charts and graphs presented in this report include summary information about these pre-K assessments. Many of the Great City School districts offer only a limited number of pre-K classrooms—and our focus was not on getting a full count of all these instruments. In addition, many of the pre-K programs that are operated on school sites may not necessarily be operated by the school district itself, so the school system may have limited knowledge of the assessment tools that are being used. Consequently, we do not offer an extended analysis or discussion of pre-K assessments in this report.

For a detailed description of state pre-K assessments, we refer the reader to the report written by Ackerman and Coley from the Educational Testing Service.¹² The report details the varied use of these assessments, observation checklists and scales, and other state-suggested or -mandated methods of assessment. Several of these assessments are considered nationally normed, standardized assessments while others are observational tools.

Still, the districts in this study use a range of pre-K instruments, including—

- Peabody Picture Vocabulary Test (PPVT),¹³
- Phonological Awareness Literacy Screening (PALS-Pre-K),¹⁴
- Developmental Indicators for the Assessment of Learning-Third Edition (DIAL-3),¹⁵
- Woodcock-Johnson Tests of Achievement,¹⁶
- Test of Preschool Early Literacy (TOPEL).¹⁷

¹² Ackerman, D. & Coley, R. (February, 2012). *State Pre-K Assessment Policies: Issues and Status*. Educational Testing Service, Policy Evaluation and Research Center. Retrieved from <https://www.ets.org/Media/Research/pdf/PIC-PRE-K.pdf>.

¹³ Dunn, L., and Dunn, D. (2007). Peabody Picture Vocabulary Test (4th Edition). Pearson Education, Inc.

¹⁴ Ivernizzi, A., Sullivan, A., Meier, J., and Swank, L. (2004). Pre-K Teachers Manual: PALS Phonological Awareness Literacy Screening. Charlottesville, VA: University of Virginia.

¹⁵ Mardell-Czudnowski, C. and Goldenberg, D. (1998). Developmental indicators for the assessment of learning – Third edition (DIAL-3). Bloomington, MN: Pearson Assessments.

¹⁶ Woodcock, R.W., McGrew, K.S., and Mather, N. (2001). Woodcock-Johnson Test of Achievement. Itasca, IL: Riverside.

¹⁷ Lonigan, C., Wagner, R., and Torgesen, J. (2007). Test of Preschool Early Literacy: TOPEL. Austin: Pro-ed.

Student Testing in America’s Great City Schools

Several states have also developed pre-K assessments for use in classrooms such as the Hawaii Early Learning Profile¹⁸ and the Florida Assessment for Instruction in Reading-K.¹⁹

B. Other Considerations with Mandatory Assessments

In addition to results specific to the various mandated assessments covered above, there are a number of cross-cutting issues worth articulating in the overall discussion of required testing. These include the factors that drive testing time, the issue of student opt-outs, and the relationship between mandated testing time and student achievement.

1) What Affects Testing Time

The amount of testing time required of students is not defined exclusively by the number of assessments that a district administers. In fact, it is often the case that what differentiates districts with large amounts of testing time from those with relatively small amounts is not the number of tests given but the number of times a year that each test is administered.

Table 2 below illustrates how this works. Both Detroit and St. Paul administer the NWEA MAP each year, but Detroit gives the test in more subjects and more frequently than does St. Paul. The result is that Detroit devotes six times more time to testing on the NWEA than does St. Paul. Additional examples from these two districts will be presented later in this report.

Table 2. Comparison of Mandatory Testing Time in Two Districts

Detroit	St. Paul
Measures of Academic Progress (MAP)	Measures of Academic Progress (MAP)
<ul style="list-style-type: none"> • Three times a year in four subjects (ELA, Math, Reading, and Science) 	<ul style="list-style-type: none"> • Two times a year in one subject (math)
<ul style="list-style-type: none"> • About 720 minutes per year per student 	<ul style="list-style-type: none"> • About 120 minutes per student per year

In fact, for all mandatory assessments, the amount of testing-related time that a school district has will be the result of a number of factors, including--

- ✚ The number of tests that are administered
- ✚ The number of subjects that are tested
- ✚ The number of times each school year that a test is given
- ✚ The number of extended-response or performance items and tasks on the tests
- ✚ The amount of test-prep time that is devoted to the assessments
- ✚ The amount of time required to arrange for and administer the tests
- ✚ The state in which the district is located

¹⁸ Teaford, P., Wheat, J., and Baker, T. (2010). HELP 3-6 Assessment Manual (2nd Edition). Palo Alto, CA: VORT Corporation.

¹⁹ Florida Department of Education. (2009). Florida Assessment for Instruction in Reading. Tallahassee, FL.

Student Testing in America's Great City Schools

Moreover, most testing is done in the second semester of the school year, although some school districts will often give at least one formative assessment in the first semester and several diagnostic tests for special populations early in the school year. Student Learning Objective exams will often have a pre-test that is given in the first part of the school year. Nonetheless, the bulk of testing is done in the second semester of the school year, making the period between the end of January and May feel like it is exclusively devoted to testing.

Finally, it is important to note that the amount of testing time for all mandated assessments reflects the number of lost instructional hours for an individual student, but it could have even greater impact on the amount of teaching time by an individual teacher. For example, some early childhood reading assessments such as DIBELS, Running Records, etc. are administered to students individually and not as a group. Teachers spend between 30 and 45 minutes administering assessments such as these to each child individually in a class, so testing time for teachers can impact instructional time significantly (for example, 10 hours for 20 students taking a 30-minute individual assessment, not including transition time between students).

2) Opt-Outs

One of the most controversial aspects of mandated assessments, particularly the summative state exams in reading and math, involves the movement by parents to opt out of tests for their children. The movement last school year was part of a nationwide protest against the number and use of standardized tests. There was wide speculation that much of the protest was centered in economically more well-to-do areas, but there was scant information nationally to know for sure.

As part of this project, the Council gathered data from its member urban school systems on the extent to which parental opting out impacted big city school systems. There were a number of individual schools in big cities where the number of parents opting out of tests was substantial, but those schools turned out to be anomalies.

Instead, the data indicate that the number and percentage of parents and students opting out of the tests was about one percent in most urban locales. (The median was less than one percent.) For instance, Baltimore City, Cincinnati, Clark County, Cleveland, the District of Columbia, Fresno, Long Beach, Milwaukee, New York City, Providence, Sacramento, San Francisco, and many others had opt-out rates ranging from less than one percent to under two percent. However, there were a small number of cities where the opt-out numbers or percentages were substantial, including Rochester (20 percent), Buffalo (15 percent), Albuquerque (6 percent), and Portland (3 percent). Finally, we found no examples where other mandated tests like the PSAT experienced opt-outs.

3) Relationship between Mandated Testing Time and Student Achievement

Results from NAEP are often used with Trial Urban District Assessment (TUDA) districts to better understand the relationship between various district characteristics and student achievement. In this case, we use NAEP data from the TUDA districts to determine if there is any relationship

Student Testing in America's Great City Schools

between student performance in reading and math on NAEP and the amount of time devoted to mandated testing. To do this, the Council research team correlated the number of mandated testing minutes in the TUDA districts with student reading and math scores on NAEP.²⁰

Figures 20 and 21 show the relationships in scatter plots between testing time from kindergarten through grade four and NAEP grade four reading ($r = -0.023$, $p=0.920$) and math performance ($r = -0.057$, $p=0.805$). The correlations show that there was no relationship between testing time and NAEP performance. Similarly, Figures 22 and 23 show the correlations between testing time from kindergarten through grade eight and NAEP grade eight reading ($r = 0.032$, $p=0.890$) and math performance ($r = 0.020$, $p=0.932$). Again, the relationships are not significant.

Overall, the data suggest that testing time does not correlate with reading and math outcomes. This suggests that increasing the number or frequency of assessments does not improve student achievement.

²⁰ The research team also analyzed the relationship between testing time and NAEP scores after correcting for free and reduced price lunch status and found no significant relationship. Also, the data were analyzed after omitting outliers, but the results indicated no significant relationship between testing time and NAEP scores. Finally, there was no significant relationship between testing time and improvements on NAEP scores.

Student Testing in America's Great City Schools

Figure 20. Relationship Between Testing Time in Grades K to 4 and Fourth Grade NAEP Scores in Math

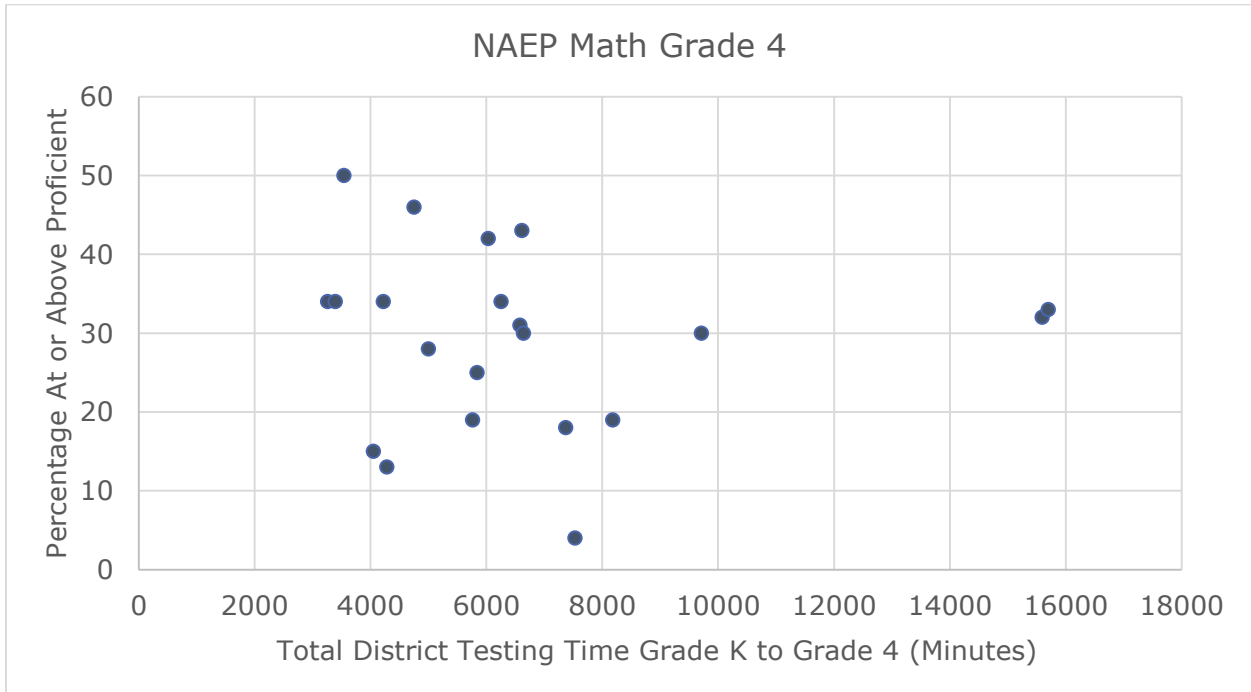
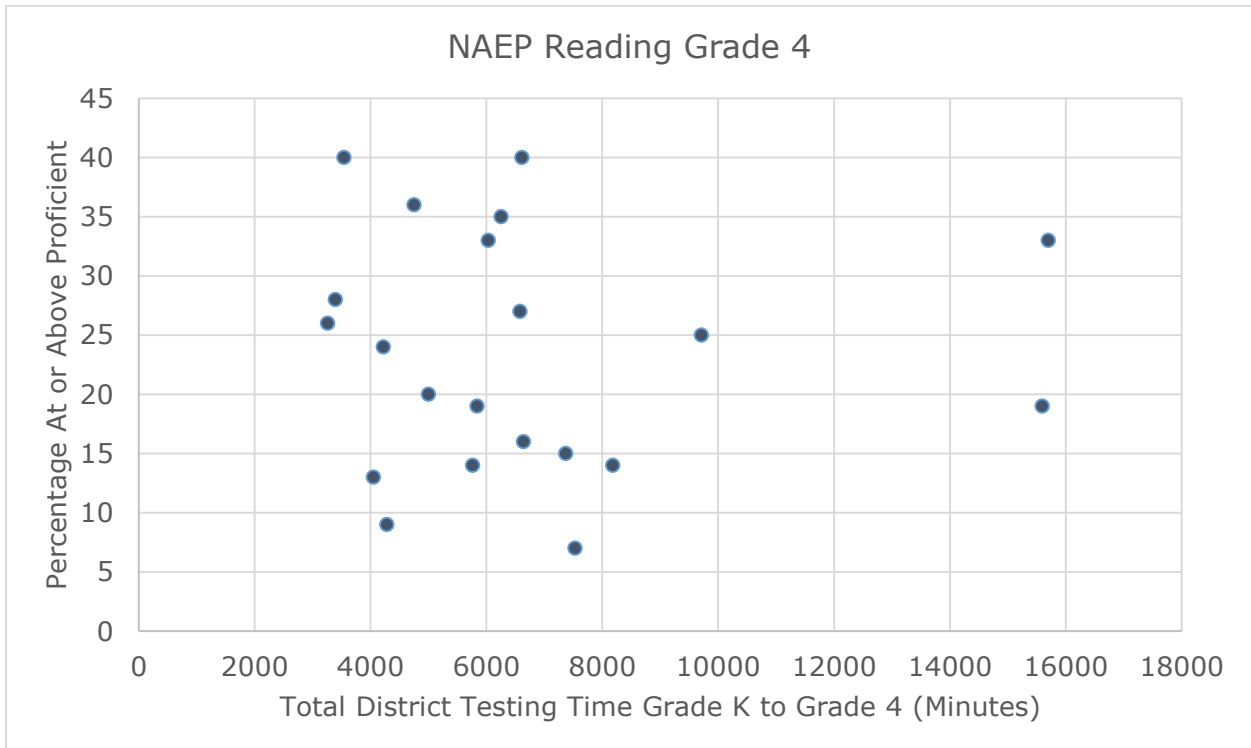


Figure 21. Relationship Between Testing Time in Grades K to 4 and Fourth Grade NAEP Scores in Reading



Student Testing in America's Great City Schools

Figure 22. Relationship Between Testing Time in Grades K to 8 and Eighth Grade NAEP Scores in Math

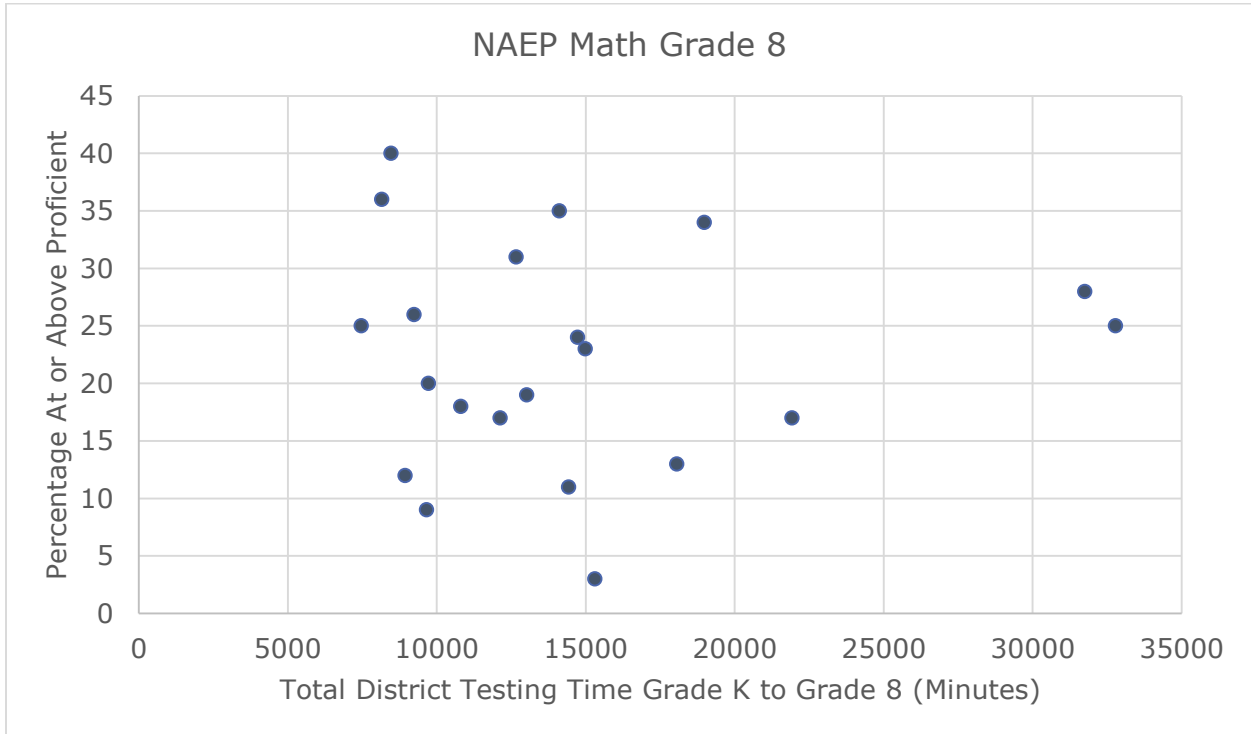
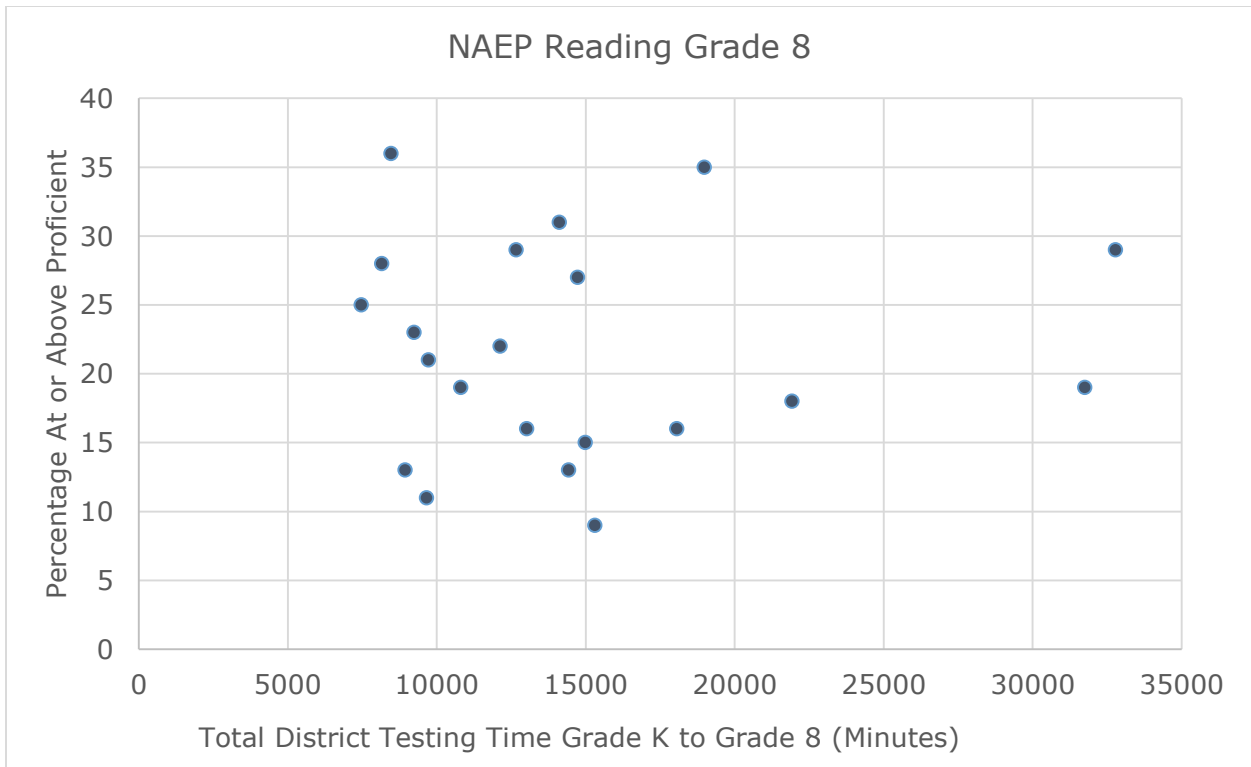


Figure 23. Relationship Between Testing Time in Grades K to 8 and Eighth Grade NAEP Scores in Reading



II. Sample and Optional Assessments

The assessments in this broad category are generally given only to a sample of students (although some may be required) across the district, are optional for students and parents, or are associated with student participation in a particular program.

A. Sample Assessments

Examples of tests in this subcategory include nationally normed assessments and formative assessments that are only given in select schools or to samples of students districtwide.

Prominent among tests in this category is the National Assessment of Educational Progress (NAEP). The test has been given to states on a voluntary basis since the 1970s, but NCLB required that states administer the test in reading and mathematics to a sample of students every two years. In addition, 21 large city school districts have volunteered to be over-sampled in that biannual testing process in order to garner individual district results.²¹ This program was initiated by the Council of the Great City Schools in 2000 and is known as the Trial Urban District Assessment (TUDA). Students in other major city school systems that are not part of TUDA are sampled every two years as part of the regular state administration of NAEP that is required by NCLB.

The Council's research team did not include testing time associated with NAEP because the difference in time between a student selected to participate in NAEP and a student who was not selected for participation is negligible. Testing time on NAEP is generally no more than one hour—including time to complete background questions—on a single day every two years in grades four and eight only. In addition, sample sizes are generally small, except in cases where the TUDA-participating district has an enrollment that requires almost all schools having a fourth and eighth grade to be included. Students are randomly selected for participation in either the reading/English language arts portion or the mathematics portion of the exam (an individual student will not take both exams).

Other norm-referenced exams and formative assessments given on a sample basis include some of the same instruments that we discussed in the previous section, but they are included here when they are given only to some students—typically a sample of students—rather than all students in a designated grade.

In the 2014-15 school year, due to the transition to college- and career-aligned assessments, many districts allowed their schools to decide whether or not they would administer district formative assessments. The research team came to understand through its interviews with districts that many

²¹ TUDA participating cities in 2015 include Albuquerque, Atlanta, Austin, Baltimore City, Boston, Charlotte-Mecklenburg, Chicago, Cleveland, Dallas, Detroit, the District of Columbia, Duval County (Jacksonville), Fresno, Hillsborough County (Tampa), Houston, Jefferson County (Louisville), Los Angeles, Miami-Dade County, New York City, Philadelphia, and San Diego.

Student Testing in America's Great City Schools

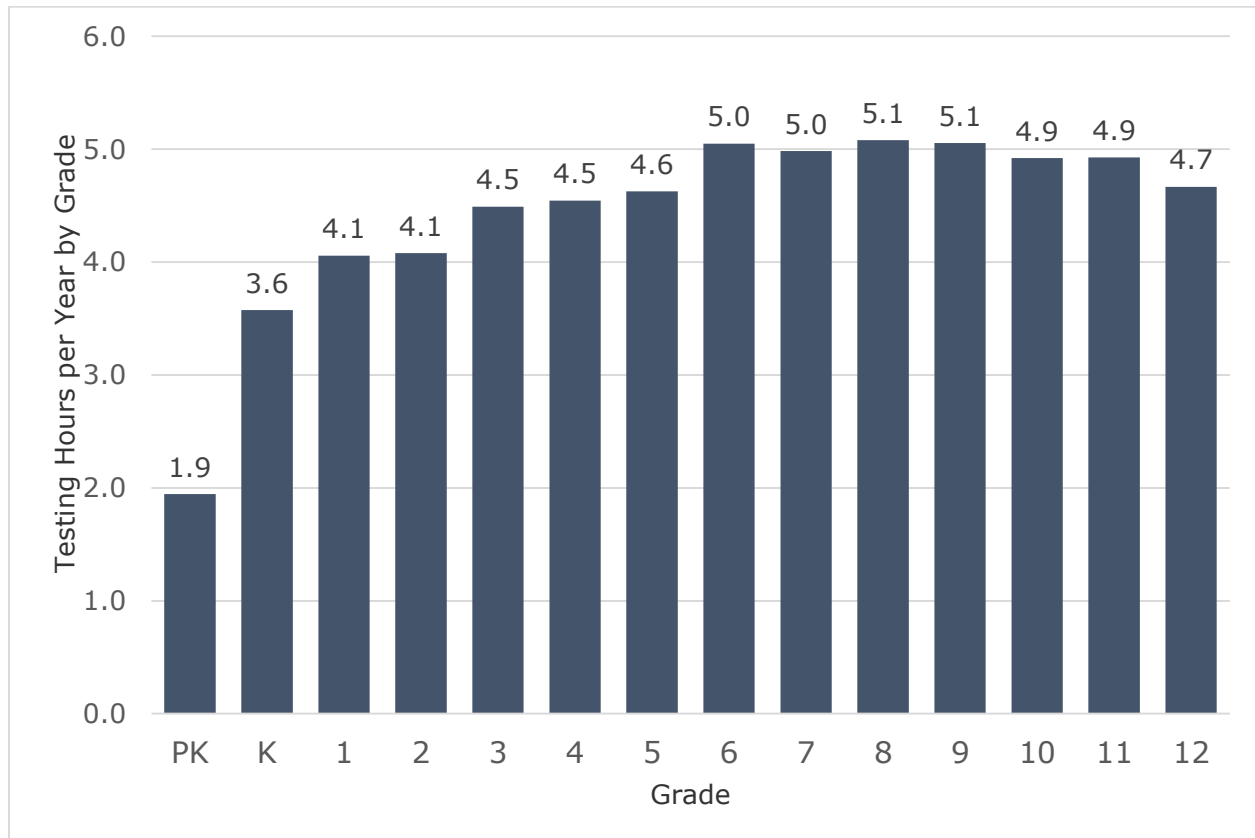
schools continued to use information from old formative assessments despite the possibility that they were misaligned with new standards and summative assessments.

Other assessments in this broad category include assessments that are administered as a result of district or school grant requirements. Many schools administer nationally norm-referenced assessments to students to fulfill requirements for grants and other program evaluations. For example, schools receiving federal Teacher Incentive Fund grants were required to administer a standardized assessment.

This requirement was also sometimes the case with schools falling into the lowest ranking on state accountability systems. Schools identified as the lowest-performing schools were frequently required to participate in testing that higher-performing schools were exempt from using.

The Council gathered data on the amount of time that students participating in these sample tests devoted to taking them. Results indicated that last school year, students taking any of these exams would devote, on average, between 1.9 hours and 5.1 hours to them. (See figure 24.) One must remember, however, that not all students take these tests.

Figure 24. Average Testing Time per Year for School, District, or Grant-Optional Assessments Given Only to Selected Students at Each Grade Level



Student Testing in America’s Great City Schools

B. Optional and Program Assessments

This category includes assessments that are administered based on individual choice or student program participation. This includes gifted and talented identification assessments that are not administered to all students in a grade level but are administered at the request of students, their families, or their teachers. Students electing to take gifted assessments accounted for most of the testing time in grades K through eight (a mean of 3.3 hours per grade level).

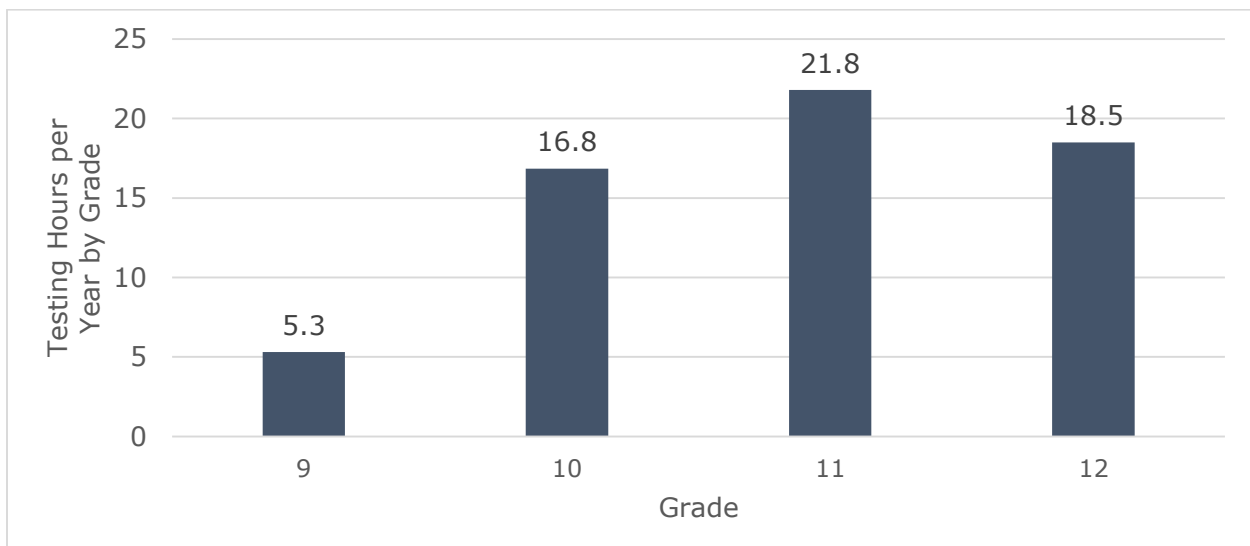
Also included here were high school Advanced Placement (AP) tests, International Baccalaureate (IB) exams, and various Career and Technical Education (CTE) tests that were given to students who chose to enroll in these courses. Tests like AP and IB are typically not required for graduation, although students wanting to go to college will often take these courses and their associated exams. At other times, CTE exams are required. (See subsection below.)

Moreover, PSAT, SAT, ACT, and other college entry exams are included in this category. (When these tests were mandated, we included them in the previous section.) Note that the majority of students will never take all assessments identified in this broad category, but as more students aspire to go to college the more test taking in this category will occur.

1) College Preparation and Entrance Exams

The Council’s research team was able to calculate testing time for AP and IB assessments, but we had to make the calculation based on the assumption that students would be taking an average of two AP or IB exams in tenth, eleventh, and twelfth grades. Participation rates in AP and IB testing are highest in the eleventh grade when students are hoping to use results as part of their college admission applications. The results indicated that students could devote about 20 hours to these exams in high school on average. (See Figure 25.)

Figure 25. Average Testing Time per Year for Student-Selected Optional Assessments



Student Testing in America's Great City Schools

Finally, students mostly in grades 10, 11, and 12 will volunteer for such college entrance examinations as the PSAT, the SAT, and the ACT. When these or similar college entrance exams were mandated by a state or school district, we included the time necessary to take these tests in the mandatory section of this report. It was not possible to calculate the exact amount of time devoted to these tests since the decisions to take them and how many times they are taken are typically left to individual students. In addition, many of these assessments are administered on Saturdays and do not always interfere with regular instructional time.

2) Career and Technical Education

High school students across the country often elect to enroll in Career and Technical Education (CTE) programs to develop skills or seek career credentials. However, many observers are unfamiliar with the testing that often accompanies these courses and programs. In fact, the Congressional reauthorization of the Carl D. Perkins Vocational and Technical Education Act of 2006 (Perkins IV) signed into law by President George W. Bush focused substantially on the link between secondary and postsecondary education and on state and local CTE accountability (20 U.S.C. 2301 et seq.).

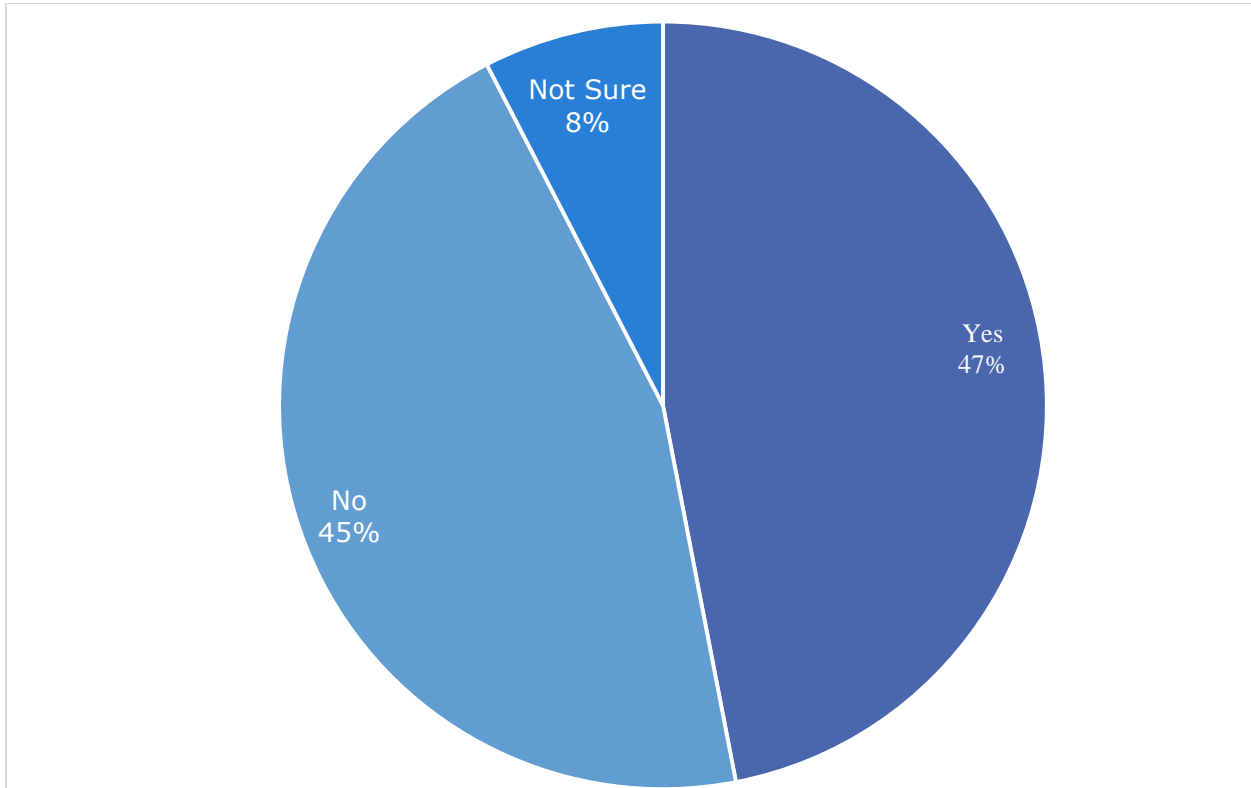
Specifically, Section 113. Accountability of the Act requires state performance “measures of each of the following: (ii) Student attainment of career and technical skill proficiencies, including student achievement on technical assessments, that are aligned with industry-recognized standards...” (p. S.250-14).²² In addition, many states inserted accountability provisions for performance on their CTE exams into their applications for federal NCLB waivers. (See Appendix A.)

Many students are required by their states to take CTE exams if they are taking a CTE course. This requirement can also be in addition to state summative exams and EOC tests in these courses. And about 47 percent of the districts reported that the results of the CTE exams were included in their RTT grants or NCLB waivers. (See Figure 26.)

²² A recent report by the Southern Regional Education Board (April, 2015) challenges states to “design accountability systems that recognize and reward districts, high schools, technology centers, and community and technical colleges” that will double the number of students acquiring postsecondary credentials (p. 7).

Student Testing in America's Great City Schools

Figure 26. Career and Technical Education Testing Results Included in State Race to the Top or NCLB Waivers



The implementation of these CTE exams varies from state to state. Some states like Iowa do not have a formal state CTE course or assessment. Districts identify assessments for their technical courses on their own. In cases like this, the state provides little or no guidance on the courses or assessments that are required of students. Other states have entered into multi-state collaborative arrangements and have recently begun to develop and administer CTE exams.

In addition, many states now include success on these exams as performance indicators in district and school accountability systems. For example, Georgia has developed a technical-skills attainment inventory (see Appendix C) that has a CTE test associated with every CTE course taught in the state. These assessments are administered to every student in Georgia completing a CTE course or completing a career pathway (i.e., a series of related CTE courses). Examples include the “Emergency Management Institute ‘Are You Ready’ Certification (FEMA),” the “Microsoft Technology Associate (MTA): Networking Fundamentals,” and “ASE Student Certification Exam: Engine Repair.” Assessment times vary substantially, depending on the nature and extent of the CTE credential. In addition, individual students may follow multiple career paths if they are interested in pursuing them. As a result, estimating testing time for CTE assessments was not feasible, but it can be considerable.

III. Assessments for Special Populations

In addition to the assessments that were described in the previous two sections, school districts use another set of measurement tools that are specific to various student groups. Prominent among these are tests for students with disabilities and assessments for English language learners.

A. Assessments for Special Education

1) *General Education Assessments*

States are required by federal law to assess the academic attainment of students with disabilities along with all other students. A detailed discussion of assessing students with disabilities is beyond the scope of this paper, but considerable research on the topic exists elsewhere. Suffice it to say that equitable access to the core curriculum and the accompanying assessment system for students with disabilities is a critical aspect of a district's decision making around whether, when, and how to provide accommodations in both instruction and testing. To meet both the spirit and letter of the law, it is becoming increasingly critical for a district's large-scale assessments to have the technical features that reflect universal design principles in order to remove barriers.

Most students with disabilities participate in the general education curriculum and spend the majority of their school time in the same classes as their peers without disabilities. More than 60 percent of students with disabilities spend 80 percent of their time in a general education classroom in a regular school with the majority of their instruction provided by a general-education classroom teacher. About 20 percent of students with disabilities spend 40-79 percent of their time in a general education classroom. And approximately 10 percent of all students with disabilities have significant cognitive impairments (U.S. Department of Education, 2015) and spend less than 40 percent of their time in a general education setting.

As the number of English Language Learners rises, the number of students who are ELLs and also have a disability increases, and they have presented special challenges for schools. Nationally, the percentage of ELLs with disabilities is almost eight percent of all public school students with disabilities (National Center on Educational Outcomes, 2011)—although their numbers can range from negligible to over 28 percent of students receiving special education services, depending on the locale.

The participation of all children in a district's educational assessment system, particularly when it is used for accountability purposes, has pushed educators and policymakers alike to think about how students with disabilities can effectively participate in instruction and assessments in ways that lessen the barriers that their disabilities may have created, while promoting learning and producing valid assessment results at the same time (Bolt & Roach, 2009; Davies & Dempsey, 2011; Laitusis & Cook, 2007; Thurlow, 2015; Thurlow, Lazarus, & Christensen, 2013). It has also pushed educators to ensure that a student's disabilities do not interfere with their learning of critical knowledge or demonstrating that knowledge on a standardized assessment.

Student Testing in America's Great City Schools

Generally, there are four main ways students with disabilities participate in statewide assessments:

- General assessments, without accommodations
- General assessments, with accommodations
- Alternate assessments based on grade-level achievement standards
- Alternate assessments based on alternate achievement standards (AA-AAS)

Students with disabilities also participate in general assessments beyond the state tests their districts administer, including NAEP; district, school, teacher-made tests; and tests used for special education eligibility evaluations and triennial evaluations. In the past, students with disabilities, ELLs, and ELLs with disabilities were provided access to all these general assessments only through accommodations, but recent attention has been devoted to universally designed assessments as a way of increasing access by modifying the assessments themselves (Thurlow & Kopriva, 2015).

For instance, new technology-based assessments provide students with access to content through such features as—

- Universal accessibility features like zoom and highlighting that are either embedded in the assessment and available to all students taking the test, or features that are not embedded but are provided *via* a teacher or test administrator.
- Designated accessibility features (such as embedded text or speech for some content or a picture dictionary) or non-embedded features (such as read aloud or bilingual dictionaries) that are available to any student. These features should be determined before testing so that they can be available to the student.
- Accommodations, either embedded or non-embedded, which include changes in testing materials or procedures in a way that allows students with disabilities or ELLs to show their knowledge and skills. One example would be a human sign-language interpreter for an ELL with a hearing impairment who does not use American Sign Language.

Both state testing consortia—the Partnership for Assessment of Readiness for College and Careers (PARCC), and the Smarter Balanced Assessment Consortium (Smarter Balanced)—have developed general education assessments that use a three-level approach to accessibility. PARCC includes (a) accessibility features for all students, (b) accessibility features that are identified in advance, and (c) accommodations. Smarter Balanced includes (a) universal tools for all students, (b) designated supports for students with documented needs, and (c) accommodations. Although similar in structure, the approaches used by the two consortia differ in their approaches to students with disabilities and ELLs. Smarter Balanced allows accommodations only for students with disabilities (those with IEPs and those with 504 accommodation plans), moving features such as translations into designated supports, while PARCC identifies several accommodations for ELLs.

Student Testing in America’s Great City Schools

The National Assessment Governing Board (NAGB), which oversees NAEP, has worked to make test participation more representative of the nation’s public school enrollment, particularly among students with disabilities and ELLs. One focus of that work has been on “who to include,” so results can be compared across jurisdictions. And a second focus for NAEP has been on “how to include” these students. This latter question has involved how students with disabilities and ELLs can access the test meaningfully and validly using accommodations that are properly selected, administered, and monitored.

Despite the challenges that NAEP has faced creating consistent policies across states, the 2013 state report noted that the National Center for Educational Statistics (2013) had made considerable progress reducing the number of special populations excluded from its assessments. For example, in its eighth-grade reading assessment, the exclusion rate for students with disabilities decreased from 31 percent in 1998 to 15 percent in 2013. Among ELLs, the exclusion rate dropped from 29 percent in 1998 to 10 percent in 2013. Still, there is considerable variability among states in exclusion rates, something that is generally attributed to differences in accommodation policies (Gerwertz, 2013).

Participation and Accommodation

The *Individuals with Disabilities Education Improvement Act (IDEIA)* requires that students receiving special education services participate in statewide and districtwide assessments. A few students with the most significant disabilities take alternate assessments.

The *Elementary and Secondary Education Act (ESEA)* also requires that all students, including those receiving special education services, must be included in the assessments used for Title I accountability. On large-scale assessments used for Title I accountability (i.e., state tests) most students with disabilities participate in the general assessment with or without accommodations. Federal requirements allow up to one percent of all students to be counted as proficient using an alternate assessment based on alternate achievement standards.

2) *Special Education Eligibility Evaluations and Other Assessments*

Students thought to need special education services may be given a number of other assessments during the school year in order to determine or pinpoint individual needs. Once a student has been identified as eligible for special education services, an assessment cycle, which includes a re-evaluation at least every three years, begins. Initial assessments can call for a full battery of tools to identify the nature of the problem, but subsequent testing is often limited to a student’s identified disability. It is permissible for a parent and the school district to agree that there is sufficient information about a child to nullify the need for some formal re-evaluations.

Federal law (IDEIA, 2004) calls for assessments in eight main areas as part of the eligibility process: health, vision, hearing, social and emotional status, general intelligence, academic

Student Testing in America’s Great City Schools

performance, communicative status, and motor abilities.²³ To diagnose any of the 13 identified disabilities,²⁴ school districts have fairly wide discretion over what battery of tests they administer, but federal regulations indicate that no single measure or assessment should be used as the sole criterion for determining whether a child has a disability or is in need of services.²⁵ IDEA specifically states—

To ensure that underachievement in a child suspected of having a specific learning disability is not due to inappropriate, inadequate, or unavailable instruction in reading or math, the district must consider, as part of the evaluation described in 34 CFR 300.304 through 300.306, the following—

- Data that demonstrate that prior to, or as a part of, the referral process, the child was provided appropriate instruction in regular education settings, delivered by qualified personnel; and
- Documentation of repeated assessments of achievement at reasonable intervals, reflecting formal assessments of student progress during instruction.

States that use Multi-Tiered Systems of Support (MTSS) (or Response to Intervention [RTI]) will include different assessment tools for students being evaluated for specific learning disabilities or other disabilities than will states that do not use MTSS.

A wide range of assessment tools are administered as part of the traditional special education evaluation process. Some major assessments are presented in Table 3.

Table 3. Sample Assessments Used for Special Education Eligibility and Re-evaluation

Reading	Math
<ul style="list-style-type: none"> • Comprehensive Test of Phonological Processing • DIBELS • Kaufman Test of Education Achievement • Woodcock-Johnson Reading Mastery Test • Peabody Individual Achievement Test 	<ul style="list-style-type: none"> • Brigance Diagnostic Inventories • Kaufman Assessment Battery for Children 2nd Edition (KABC II) • Kaufman Scales of Early Academic and Language • Peabody Individual Achievement Test • Stanford Test of Academic Skills • Woodcock-Johnson Tests of Achievement
Written Language	Behavior
<ul style="list-style-type: none"> • Oral and Written Language Skills • Test of Written Language 	<ul style="list-style-type: none"> • Behavior Assessment System for Children • Connors Rating Scale

²³ Section 300.304 Evaluation Procedures. (c)(4). “The child is assessed in all areas related to the suspected disability, including, if appropriate, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor skills.

²⁴ Autism, deaf-blindness, deafness, emotional disturbance, hearing impairment, intellectual disability, multiple disabilities, orthopedic disabilities, other health impairments, specific learning disabilities, speech or language impairments, traumatic brain injury, and visual impairments

²⁵ Section 330.304 Evaluation Procedures. (b)(2).

Student Testing in America’s Great City Schools

<ul style="list-style-type: none"> • Standards-Based Assessment (SBA) • Wechsler Non-verbal • Peabody Individual Achievement Test 	<ul style="list-style-type: none"> • Bateria III
<p>Communications</p> <ul style="list-style-type: none"> • CASL • CELF-Preschool • Clinical Assessment of Articulation and Phonology • Comprehensive Receptive and Expressive Vocabulary Test • Kaufman Speech Praxis Test • Test of Adolescent Language 	<p>Social Emotional</p> <ul style="list-style-type: none"> • Bateria III • Differential Ability Scales • Kaufman Assessment Battery for Children • Wechsler Non-verbal
<p>Functional Living Skills</p> <ul style="list-style-type: none"> • Adaptive Behavioral Inventory for Children • Denver Developmental Screening Test • Scales of Independent Behavior • Vineland Adaptive Behavior Skills • Kaufman Assessment Battery for Children 	<p>Oral Expression</p> <ul style="list-style-type: none"> • Kaufman Scales of Early Academic Language • Accessing Comprehension and Communication in English • Bateria III • Woodcock-Johnson Test of Achievement
<p>Listening Comprehension</p> <ul style="list-style-type: none"> • Accessing Comprehension and Communication in English • Khan-Lewis Phonological Analysis • Wechsler Non-verbal 	<p>Motor Skills</p> <ul style="list-style-type: none"> • Developmental Test of Visual-Motor Integration • Motor Free Visual Perception Test • Bruininks-Oseretsky Test of Motor Proficiency • Peabody Developmental Motor Scales

In reviewing the literature, we were able to find several estimates that said the average testing time for a psychological evaluation of a student is about three to four hours.²⁶ This time often varies based on the age, grade level, and disability of the student, with preschool and kindergarten students taking up to three hours, first grade through age sixteen taking about four hours, and students aged sixteen or older taking as much as five hours to complete an evaluation.²⁷ (Other types of evaluations may require differing lengths of time.) These estimated times, however, have not been added to the testing time of other assessments in this study because of the dedicated nature and purposes of these instruments.

²⁶ See, for example, Camara, W. J., Nathan, J. S., & Puente, A. E. (2000). Psychological test usage: Implications in professional psychology. *Professional Psychology: Research and Practice*, 31(2), 141-154. doi: 10.1037//0735-7028.31.2.141

²⁷ Clarity: The Speech Hearing and Learning Center. Psychology frequently asked questions. Retrieved from <http://www.clarityupstate.org/frequently-asked-questions-learning>

Student Testing in America’s Great City Schools

B. Assessments for ELLs

States are also required by federal law to adopt an English language proficiency assessment to determine when English learners are ready to exit language support services. Still, states have considerable discretion over the terms of those exits and what exams they will require their districts to administer.

These assessments are given by local school districts once a year and typically require less than two hours per student, depending on the test and the numbers of domains tested (i.e., listening, speaking, reading, and writing). Examples of the most commonly administered English language proficiency tests include Assessing Comprehension and Communication in English State-to-State for ELLs (ACCESS), the English Language Development Assessment (ELDA), and Language Assessment Scales Links (LAS). In addition, some districts require their own assessments. A breakdown of which city school systems administer what English language proficiency assessments is shown in Table 4 below.

Table 4. Tests Used to Assess English Language Proficiency, 2014-15

Assessing Comprehension and Communication in English State-to-State (ACCESS)—Total testing time about 145 minutes across all four domains)	
<ul style="list-style-type: none"> • Albuquerque • Anchorage • Atlanta • Baltimore City • Birmingham • Boston • Charlotte-Mecklenburg • Charleston • Chicago • Clark County • Denver • Detroit • District of Columbia • Guilford County (NC) • Honolulu • Indianapolis 	<ul style="list-style-type: none"> • Jackson • Jefferson County (KY) • Kansas City (MO) • Milwaukee • Minneapolis • Nashville • Newark • Norfolk • Oklahoma City • Philadelphia • Pittsburgh • Providence • Richmond • Shelby County (TN) • St. Louis • St. Paul
English Language Development Assessment (ELDA)—Total testing time between 160 and 170 minutes	LAS Links—(Total testing time between 95 and 155 minutes)
<ul style="list-style-type: none"> • Des Moines • East Baton Rouge • Omaha 	<ul style="list-style-type: none"> • Bridgeport

Student Testing in America’s Great City Schools

State-developed English Language Proficiency Assessments
<p>California English Language Development Test (CELDT)—(Test is untimed but typically takes about 120 minutes.)</p> <ul style="list-style-type: none"> • Fresno • Long Beach • Los Angeles • Oakland • San Diego • Santa Ana
<p>Comprehensive English Language Learning Assessment (CELLA)</p> <ul style="list-style-type: none"> • Broward County • Duval County • Miami-Dade County • Orange County • Palm Beach County
<ul style="list-style-type: none"> • Wichita—Kansas English Language Proficiency Exam (KELPA)
<p>New York State English as a Second Language Achievement Test (NYSESLAT)—(Test is untimed but typically takes between 50-70 minutes.)</p> <ul style="list-style-type: none"> • Buffalo • New York City • Rochester
<p>Ohio Test of English Language Acquisition (OTELA)—(Test typically takes between 115-140 minutes.)</p> <ul style="list-style-type: none"> • Cincinnati • Cleveland • Columbus • Dayton • Toledo
<ul style="list-style-type: none"> • Portland—English Language Proficiency Assessment (ELPA)
<p>Texas English Language Proficiency Assessment (TELPAS)</p> <ul style="list-style-type: none"> • Austin • Dallas • El Paso • Fort Worth • Houston
<ul style="list-style-type: none"> • Seattle—Washington English Language Proficiency Assessment (WLPA)

Student Testing in America's Great City Schools

English learners are also required under NCLB to take reading and math tests in grades three through eight and once in high school, like all other students. The vast majority of states administer their NCLB-required assessments in English. However, the U.S. Department of Education has ruled that newly arrived students can be exempted from one administration of the state's ELA test.²⁸

Some districts, moreover, recognize that testing ELL student proficiency in the various content areas in English can yield questionable determinations of student skills and knowledge in those subjects. Consequently, some districts administer assessments in Spanish or other native languages using assessments such as “Logramos,” designed to mirror the Iowa Test of Basic Skills, or “Aprenda,” modeled after the Stanford 10. Many districts use these assessments in place of the nationally normed assessment that is typically given to general education students. And they will sometimes use these versions of the norm-referenced exams as part of their dual language programming. The Council research team did not count these assessments as additional assessments if the general population took a similar assessment in English—although we know of some districts that give both to the same ELLs.

Finally, districts administer a “Home Language Survey” to determine whether a student is living in a household where English is not the predominant language spoken. These instruments are typically required by the states, although most do not mandate a particular form of the surveys.^{29,30} Usually, these instruments consist of a handful of questions that are asked of parents—not students—as part of an intake interview or process.

²⁸ 34 CFR Part 200, RIN 1810-AA97. “Under proposed Sec. 200.6(b)(4), a State would be able to exempt ‘recently arrived LEP students’ from one administration of the State’s reading/language arts assessment. Proposed Sec. 200.6(b)(4)(i) would define a recently arrived LEP student as a LEP student who has attended schools in the United States (not including Puerto Rico) for less than 10 months.” (May 2007)

²⁹ English Language Learners in America's Great City Schools: Demographics, Achievement, and Staffing. (2013). Washington, D.C.; Council of the Great City Schools

³⁰ Alison L. Bailey and Kimberly R. Kelly. “The Use and Validity of Home Language Surveys in State English Language Proficiency Assessment Systems: A Review and Issues Perspective,” The Evaluation of English Language Proficiency Assessments Project. UCLA, July 2010. The white paper identifies Louisiana, Nebraska, and South Dakota as three states that do not mandate the use of an HLS but rather only recommend its use.

IV. Looking at Testing in the District Context

A. Most Frequently Administered Tests

The analyses of testing in the Great City Schools indicated that the most commonly administered exams in the 66 districts on which we had data included the ACT, the SAT, and ACCESS—all of which are optional or are special-population tests. A summary is shown in Table 5 below.

Table 5. Most Commonly Administered Assessments in the Great City Schools

Name of Assessment	Number of Districts in Which Assessment Is Given
NAEP	66 districts
ACT	61 districts
ACT Plan	17 districts
ACT Explore	8 districts
SAT	53 districts
PSAT	45 districts
SAT ReditStep	8 districts
ACCESS	34 districts
DIBELS	20 districts
SBAC	17 districts
NWEA MAP	17 districts
PARCC	15 districts
ITBS	13 districts
FitnessGram ³¹	13 districts
SRI	12 districts
DRA	8 districts
STAR	8 districts

B. Testing Portfolio in the Average Urban School District

The Council collected the testing calendars for all 66 districts included in this report. Many calendars are quite similar to one another except for the names of the tests and the number of times they are given. An example of a typical assessment calendar is the testing calendar from Hillsborough County (Tampa) for the 2014-15 school year, shown in Table 6 below.³² This

³¹ FitnessGram is a physical fitness exam that is required by some states and administered voluntarily by some districts.

³² Material from 2014-15, K-12 Testing Calendar, Hillsborough County Public Schools

Student Testing in America’s Great City Schools

calendar was also selected because Hillsborough County has a fully developed system for assessing teachers in non-tested grades and subjects.

Table 6. Testing Portfolio and Calendar for Hillsborough County, 2014-15

Test	Grades	First Day of Test Window	State Statute or Rule
Florida Kindergarten Readiness Screening (FLKRS)	K	August 19, 2014	§1002.69
Postsecondary Educational Readiness Test (PERT)	11-12	August 19, 2014	§1008.30
Math Formative/Diagnostic Test 1	3-5	August 25, 2014	§1008.33/6A-6.609811 for required schools
Kindergarten Readiness Test (KRT)	K	August 25, 2014	§1002.69
Writing Formative/Diagnostic Test	6-8	August 25, 2014	§1008.33/6A-6.609811 for required schools
Science Formative/Diagnostic Test	5	August 25, 2014	§1008.33/6A-6.609811 for required schools
Science Formative/Diagnostic Test	6-8	August 26, 2014	§1008.33/6A-6.609811 for required schools
Writing Formative/Diagnostic Test	9-11	August 26, 2014	§1008.33/6A-6.609811 for required schools
FitnessGram	2 and 5	September 2, 2014	§1008.33/6A-6.609811 for required schools
Florida Assessment for Instruction in Reading (FAIR)	K-10	September 2, 2014	§1002.69/6A-6-6.053
Fall Administration of EOC—US History, Biology, Algebra I, Geometry		September 15, 2014	§1008.22 and 1003.4282
Fall Pretests—Credit-Earning Courses	7-12	September 16, 2014	§1008.22
FCAT 2.0 Reading and Math Retakes	Retained 10-12	October 6, 2014	§1008.22
Math Formative/Diagnostic Test	6-8	October 13, 2014	§1008.33/6A-6.6099811 for required schools
Math Benchmark Formative/Diagnostic Test A	High School	October 13, 2014	§1008.33/6A-6.6099811 for required schools

Student Testing in America’s Great City Schools

ReadiStep	7	October 15, 2015	§1008.33/6A-6.6099811 for required schools
PSAT	9-11	October 15, 2014	§1007.35
ELA Interim Assessment	2-5	October 21, 2014	§1008.33/6A-6.6099811 for required schools
Writing Formative/Diagnostic Test	6-8	November 4, 2014	§1008.33/6A-6.6099811 for required schools
Math Formative/Diagnostic Test 2	3-5	November 10, 2014	§1008.33/6A-6.6099811 for required schools
Social Studies Formative/Diagnostic Test—U.S. History (Regular and Honors)		November 10, 2014	§1008.33/6A-6.6099811 for required schools
Science Formative/Diagnostic Test	5 and 8	December 1, 2014	§1008.33/6A-6.6099811 for required schools
Writing Formative/Diagnostic Test	9-11	December 1, 2014	§1008.33/6A-6.6099811 for required schools
Personal Fitness Exam	Select	December 1, 2014	§1008.22
Winter Administration of EOC--US History, Biology, Algebra I, Geometry		December 1, 2014	§1008.22 and 1003.4282
FSA English Language Arts Writing Component Field Test	Select	December 1, 2014	§1008.22
Florida Assessment for Instruction in Reading (FAIR)	K-10	December 1, 2014	§1002.69/6A-6.053
FitnessGram	6-8	December 1, 2014	
ELA Interim Assessment	2-5	January 12, 2015	§1008.33/6A-6.6099811 for required schools
Mid-year and Semester Exams	6-12	January 13, 2015	§1008.22
NAEP/TUDA--Sample	4 and 8	January 26, 2015	§1008.22 selected sites
Math Formative/Diagnostic Test 3	3-5	February 16, 2015	§1008.33/6A-6.6099811 for required schools
Spring Pretests—Credit-Earning Courses	7-12	February 17, 2015	§1008.22

Student Testing in America’s Great City Schools

Florida Alternate Assessment	3-11	February 23, 2015	§1008.22
SAT	11	February 25, 2015	§1008.22
Florida Standards Assessment (FSA)	4-11	March 2, 2015	§1008.22
Comprehensive English Language Learner Assessment (CELLA)	K-12 ELLs	March 2, 2015	Rule 6A-6.0902
Science Formative/Diagnostic Tests—Biology		March 16, 2015	§1008.33/6A-6.6099811 for required schools
Social Studies Formative/Diagnostic Test—U.S. History (Regular and Honors)		March 16, 2015	§1008.33/6A-6.6099811 for required schools
Stanford 10	1-2	March 23, 2015	§1008.22
Math Formative/Diagnostic Test B	6-8	March 23, 2015	1008.33/6A-6.6099811 for required schools
FCAT 2.0 Reading and Math Retakes & Retained	10-12	March 23, 2015	§1008.22
Florida Standards Assessment (FSA)—ELA/Math—paper based	3-4	March 23, 2015	§1008.22
Algebra EOC Retakes	10	March 30, 2015	§1008.22 and 1003.4282
Florida Assessment for Instruction in Reading (FAIR)	K-8	April 6, 2015	§1002.69
Florida Standards Assessment (FSA)	5-8 math 5-11 ELA	April 13, 2015	§1008.22
FCAT 2.0 Science	5 and 8	April 13, 2015	§1008.22
Stanford 10 Abbreviated	3	April 14, 2015	§1008.25
Biology EOC (FSA)		April 20, 2015	§1008.22 and 1003.4282
Algebra II EOC (FSA)		April 27, 2015	§1008.22 and 1003.4282
Geometry EOC (FSA)		May 4, 2015	§1008.22 and 1003.4282
KRT Post-test Kindergarten	K	May 1, 2015	§1008.22
FitnessGram Post-test	2 and 5-8	May 1, 2015	
Algebra I EOC (FSA)		May 11, 2015	§1008.22 and 1003.4282
Art, Music, PE, Dance District Assessment	1-5	May 1, 2015	§1008.22

Student Testing in America’s Great City Schools

International Baccalaureate (IB) Testing	11-12	May 4, 2015	§1003.4295
Personal Fitness Exam	Select	May 4, 2015	§1008.22
Advanced Placement (AP) Exams	9-12	May 4, 2015	§1003.4295
Biology EOC (FSA)		April 20, 2015	§1008.22 and 1003.4282
End of Year Math-Kindergarten	K	May 11, 2015	§1008.22
End of Year Science	K-4	May 11, 2015	§1008.22
Civics EOC (NGSSS)	7	May 18, 2015	§1008.22
US History EOC (NGSSS)	9-12	May 18, 2015	§1008.22 and 1003.4282
End of Year and Semester Exams	6-11, 12	June 1, 2015	§1008.22
ACT		9/13, 10/25, 10/26, 12/13, 12/14, 2/7, 4/18, 4/19, 6/13, 6/14	Optional
SAT		10/11, 11/8, 12/6, 1/24, 3/14, 5/2, 6/6	Optional

C. Student Testing Experience in High- and Low-Testing Urban School Districts

In addition, the Council determined the district whose mandatory testing time was one of the highest of the 66 districts on which we had data and the district that was one of the lowest in mandatory testing time. The district with one of the highest amounts of mandatory testing time was Detroit, and the district with one of the lowest amounts was St. Paul.

The research team created a sample third-grade student who was an ELL and estimated what their testing experience might look like over the course of the 2014-15 school year. Neither one of these two districts administers EOC exams, formative assessments, or SLOs. The results are shown in Tables 7-9 below.

Table 7. Example of Testing Experience of a Sample ELL Third Grader in High and Low Testing Districts

St. Paul (Low Testing District)				
Test	Times per Year	Subjects	Time per Test	Total Testing Time
State NCLB Test	1	ELA Math	90 minutes	180 minutes
ELL Assessment	1	English language proficiency	150 minutes	150 minutes

Student Testing in America's Great City Schools

Cognitive Abilities Test (CogAT)	1	Full test battery	200 minutes	200 minutes
Optional Local Purpose Assessment (OLPA)	1	Reading Math	60 minutes	120 minutes
Total				650 minutes or 10.8 hours or 1.0%
Detroit (High Testing District)				
Test	Times per Year	Subjects	Time per Test	Total Testing Time
State NCLB Test	1	ELA Math	210 minutes	420 minutes
ELL Assessment	1	English language proficiency	150 minutes	150 minutes
NWEA MAP	3	ELA Reading Math Science	60 minutes	720 minutes
STAR	3	ELA Reading Math	60 minutes	540 minutes
Total				1,830 minutes or 30.5 hours or 2.8%

Table 8. Example of Testing Experience of Sample ELL Eighth Grader in High and Low Testing Districts

St. Paul (Low Testing District)				
Test	Times per Year	Subjects	Time per Test	Total Testing Time
State NCLB Test	1	ELA Math	90 minutes	180 minutes

Student Testing in America’s Great City Schools

ELL Assessment (Sample)	1	English language proficiency	150 minutes	150 minutes
ACT Explore	1	ELA Reading Math Science	30 minutes	120 minutes
Optional Local Purpose Assessment (OLPA)	1	Reading Math	60 minutes	120 minutes
Total				650 minutes or 10.8 hours or 1.0%
Detroit (High Testing District)				
Test	Times per Year	Subjects	Time per Test	Total Testing Time
State NCLB Test	1	ELA Math Social Studies	240 minutes (ELA) 210 minutes (Math) 100 minutes (Social Studies)	550 minutes
ELL Assessment (Sample)	1	English language proficiency	150 minutes	150 minutes
NWEA MAP	3	ELA Reading Math Science	60 minutes	720 minutes
STAR	3	ELA Reading Math	60 minutes	540 minutes
High School Placement Test	1	Reading Math Science	50 minutes	150 minutes
Districtwide World Language	1	Language Proficiency	180 minutes	180 minutes

Student Testing in America’s Great City Schools

Proficiency Exam				
National Assessment of Educational Progress (NAEP) (Sample)	1	Reading or Math	60 minutes	60 minutes
Total				2,350 minutes or 39.2 hours or 3.6%

Table 9. Example of Testing Experience of Sample ELL Eleventh Grader Who Is Taking a CTE and/or AP Exam in High and Low Testing Districts

St. Paul (Low Testing District)				
Test	Times per Year	Subjects	Time per Test	Total Testing Time
State NCLB Test	1	Math Science	90 minutes	180 minutes
ELL Assessment (Sample)	1	English language proficiency	150 minutes	150 minutes
ACT	1	English Reading Math Science Writing	215 minutes	215 minutes
Accuplacer	1	Reading Math Writing	60 minutes	180 minutes
GRAD	1	Math	60 minutes	60 minutes
AP (Sample & Typical Subjects)	1	History Science	180 minutes	360 minutes

Student Testing in America's Great City Schools

Total				1,145 minutes or 19.1 hours or 1.8%
Detroit (High Testing District)				
Test	Times per Year	Subjects	Time per Test	Total Testing Time
State NCLB Test	1	ELA Math Social Studies Science	270 minutes (ELA) 240 minutes (Math) 50 minutes (Science) 50 minutes (Social Studies)	610 minutes
ELL Assessment (Sample)	1	English language proficiency	150 minutes	150 minutes
Work Keys/ Work Skills		Career and Technical Education	135 minutes	135 minutes
PSAT		Verbal and analytic skills	150 minutes	150 minutes
NWEA MAP	3	ELA Reading Math Science	60 minutes	720 minutes
STAR	3	ELA Reading Math	60 minutes	540 minutes
ACT	1	English Math Reading Science Writing	215 minutes	215 minutes
AP (Sample and Typical)	1	History Science	180 minutes	360 minutes

Student Testing in America’s Great City Schools

Total			2,880 minutes or 48.0 hours or 4.4%
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D. Putting Testing Time in Context

There are no standards *per se* for gauging whether the nation’s urban school systems test too much, test too little, or conduct about the right amount of testing. As shown previously in Figure 3, the amount of time students spend taking mandatory tests constitutes a surprisingly low percentage (2.34 percent) of the overall time they spend in school given the amount of controversy this issue has generated. At the same time, there are clearly a considerable number of tests, and these tests often pile up at critical points during the school year. But how much is too much, and where is this tipping point?

While it is not possible to apply benchmarks to what we found in this study, we can compare the testing done in urban districts nationwide with other activities and other countries. A year ago, the National Center on Education and the Economy (NCEE, 2015) published a report called *Fixing Our National Accountability System* in which author Marc Tucker argued that the U.S. testing system was unique, compared with other countries, in its use of standardized test scores to assess teacher and administrator performance. It follows that the United States was the only country studied where exams were mandated for all students in grades three through eight and once in high school.

By way of comparison, Tucker presented data on the frequency with which top performing countries test students. His research indicated that the countries he studied³³ were most likely to test their students in grades six, nine, and 11. Most tests in those grades were in math, reading or language, and science, but they sometimes also included civics, geography, and social studies. Often these tests were administered for diagnostic purposes or for gauging a student’s readiness for higher levels of work. The number of tests in the sixth grade typically included assessments in two or three subjects, while testing in grade nine involved anywhere from two to eight subjects. Finally, testing in the 11th, 12th, or 13th grades could involve exams in three to as many as ten subjects. Again, in comparison, the average student in the U.S. districts studied typically took eight standardized tests a year every year between pre-k and grade 12.

The NCEE report provides no data on the amount of time these tests take, but the report does conclude that the U.S. conducts more testing and uses student assessment results for differing purposes than other countries. Tucker’s underlying claim is that our test-based accountability system has had negative consequences for U.S. schools, teachers, and students. Yet this finding alone does not suggest that the lower levels of testing in these other countries cause these nations

³³ Countries or cities included Ontario, Canada; Shanghai, China; Estonia; Finland; Hong Kong; Japan; Korea; Poland; Singapore; Taiwan; and the United States.

Student Testing in America's Great City Schools

to produce higher academic performance, or that the higher levels of testing in the U.S. result in lower international test results.

Another way to put testing time into context is to compare the amount of time students devote to testing to other school-based activities that students engage in. For instance, a student in the eleventh grade who is on the football team might spend as much as 48 hours taking mandated assessments over the course of the school year, but could spend some 84 hours at football practice between mid-August and the end of November (assuming six hours of practice a week for three and a half months). In this context, the amount of time the student may spend taking tests doesn't seem so high, unless one considers that this 11th grader might also be taking optional AP tests in multiple subjects.

Similarly, elementary and middle school field trips typically take one school day (three to four hours at the site plus lunch and transportation time).³⁴ The annual testing time of approximately 4.22 days is equivalent to about four student field trips annually. A survey of elementary, middle and high school teachers in Clark County showed that 35 percent of teachers take two or more field trips per year and another 37 percent took at least one trip per year.³⁵ We did find examples, however, of schools that provided up to 16 field trips per year for its average student.³⁶

E. Examples of Districts that Are Reducing Testing

Over the last several years, many of the districts examined in this study have reduced the number of tests they administer mostly on their own. The narrative below describes examples.

- *Boston*—In 2014-15, the district moved to decrease the number of predictive pre-post tests administered by the district; it reduced the number of schools that would have to give a formative assessment based on the district's scope and sequence; and it cut the number of grade K-2 assessments from two to one. Most of the reductions applied to schools that are making substantial academic progress.
- *Dallas*—In 2015-16, the district is eliminating its K-2 non-core testing and one administration of its performance tests. In addition, the district will be reducing all second-semester tests where there is a state test administered. This will be a reduction of 47 tests.
- *District of Columbia*—In 2014-15, the district convened an assessment task force of parents, students, teachers, and principals. A number of changes resulted. First, the district made some modest changes in the grade levels at which it administers some assessments. For example, the district in 2015-16 won't administer DIBELS beyond third grade once students reach the "ceiling" performance level. Similarly, the district won't administer TRC exams once the "ceiling" performance level is reached. Second, in an attempt to better involve

³⁴ See, for example, Discovery World in Milwaukee, WI. Retrieved from http://cdn.discoveryworld.org/wp-content/uploads/2014/08/14SEPT_Educator-Guide_Elementary.pdf

³⁵ Brody, A. (2006). Clark County School District Attitudes, Perceptions, Barriers, and Desires for Field Trip Experiences. 1-28. Available at: http://digitalscholarship.unlv.edu/pli_environment_education/2

³⁶ Retrieved from <http://www.edutopia.org/practice/learning-expeditions-rethinking-field-trips>

Student Testing in America's Great City Schools

teachers in the assessment process, the district brought middle school social studies teachers together to create an end-of-course assessment for U.S. history. Third, the district created an Office of Instructional Practice that will provide regular, ongoing feedback to teachers using formative assessment data while also reviewing instructional practice. Finally, the district is working to demystify its assessments by revising its elementary school report cards to provide more understandable information about each student's reading level and recommend appropriate books for that reading level. The district also uses its home visits as an opportunity for teachers to explain to parents what their child's progress on assessments looks like.

- *Duval County* (Jacksonville)—In 2015-16, the district significantly reduced the number assessments for students compared to the 2014-15 school year. At the elementary level, the number of required district assessments went from 23 to 10 (seven of which were required by the state for teacher evaluation purposes) and at the secondary level tests were reduced from 29 to 12 (four of which are required by the state for evaluation purposes).
- *Fresno*—In 2014-15, the district established an Assessment Council comprised of 25 teachers, eight principals and three central office staff and charged it with delineating state and federally mandated assessments, district-facilitated assessments, and classroom-level assessments, along with the frequency of administration. The Council researched formative and summative assessments, studied best practices, investigated online interim assessments, and examined the current assessment system and its impact on student and teacher testing time. Recommendations resulted in limiting the number of assessments to four windows a year, reducing the number of reading comprehension assessments from three to two, moving math fluency tests from four times a year to a site-based choice, omitting ELDA testing, and making SBAC interim assessments optional.
- *Hillsborough County*—In 2010-11, the district eliminated testing in grades three through 10 on the SAT-10 and reduced testing time in grades one and two. In 2011-12, the district eliminated end-of-year tests in math, science, and writing in grades one through five. The district also eliminated semester exams in courses with a required state EOC. It also made formative reading exams optional, thus eliminating four sessions of classroom testing. For 2015-16, the district is eliminating ReadStep in grade seven. Pursuant to state legislation, the district no longer requires the PSAT, SAT, and ACT for every student. The district used results from already-administered exams to meet state requirements to evaluate teachers. Examples included kindergarten teacher use of the DRA, EELP-teacher use of the Battelle Inventory to monitor progress on IEP goals, and multiple uses of semester exams.
- *Houston*—In the new school year (2015-16), the district eliminated the norm-referenced testing (ITBS), and it eliminated all district-provided benchmarks at the beginning and middle of the year.
- *Jackson*—In the 2014-2015 school year, the district's testing calendar had 169 school days set aside for testing; in the 2015-16 school year, the district had 154 days set aside for testing.
- *Miami-Dade County*—In 2014-15, the district eliminated 24 district-developed benchmark assessments. In spring 2015, the district eliminated nearly all of its 300 district-developed

Student Testing in America's Great City Schools

EOCs pursuant to HB 7069 signed by the governor. Some 23 EOC exams in elementary school, 69 EOC exams in middle school, and 180 EOC exams in high school were eliminated. Compared to last year, the district requires only four total tests beyond those required by federal and state governments.

- *Milwaukee*—In 2014-15, the district issued a request for proposals for its Universal Screening Assessments. The district was able to find an assessment that saved over 3.5 hours of testing time per child. The new assessment is both a universal screener and a progress monitor, and it saves teachers data entry time because results do not have to be recorded in another product. The district also requested to have its French and German Immersion students in grades K4-2nd waived from the early literacy assessment required by the state. The result is that students will be tested three hours less per year, than in the previous school years at participating schools. The waiver also includes K4 Spanish bilingual students.
- *Minneapolis*—In 2015-16, the district is scaling back on benchmark and quarterly interim testing in grades kindergarten through grade 10 in math, ELA, social studies, visual arts, music, media, physical education, health, as well as geometry, algebra, geography, physical science, world history, and economics/government.
- *Orange County (Orlando)*—In 2014-15, the district eliminated 42 summative assessments in elementary grades. Some 34 other benchmark assessments were eliminated, and more extensive professional development on the use of formative assessments was put in their place. In 2013-14, the district eliminated about half of its benchmark assessments.
- *Rochester*—In the 2013-2014 school year, the Rochester City School District used locally created post-assessments as part of the APPR process for teachers with SLOs. All students in courses and grades who were not covered by state assessments were asked to sit for post-assessments. Accordingly, the district administered 140,711 individual assessments. In the 2014-2015 school year, the district continued to use locally created post-assessments as part of the APPR process but only scheduled students in courses that were part of a teacher's SLOs. Accordingly, the district scheduled 80,770 individual assessments – a reduction of over 40 percent in 2014-15 (59,941 assessments). At the K-2 level, the district employs performance-based assessments in Math and English Language Arts to satisfy NYS APPR regulations and to gauge student progress. In the 2013-14 school year, these performance-based assessments took up a significant amount of instructional time. In the 2014-15 school year, teacher teams streamlined the assessments, resulting in a 20 percent reduction of time needed to administer.
- *Sacramento*--In 2013-2014 and 2014-2015, the district suspended administration of benchmark assessments to focus on building teacher and leadership capacity around the implementation of the common core math and ELA. In 2014-2015, the district's professional learning focused on using high-quality tasks and formative-assessment practices. The district also engaged in a yearlong process to identify a vendor for a new CCSS-aligned assessment system and is in the process of constructing interim assessments that align to the content under study.

Student Testing in America's Great City Schools

- *San Diego*—In the new school year, 2015-2016, the district plans to eliminate its science benchmarks because they are aligned to the old standards. As the district implements the Next Generation Science Standards, the district will consider new assessments. The district kept its interim CCSS assessments but began administering them online with Illuminate. The district will also use the Developmental Reading Assessment, second edition (DRA 2) to assess students' growth in grades TK-3.
- *Seattle*—In 2014-15, the district reduced its MAP testing requirement in grades K-8 of two times a year to once a year in K-2. In 2015-16, the district will begin offering schools a briefer version of MAP. The district also eliminated the requirement for fifth graders to take MAP for math placement; it will use SBAC results instead. The district also reduced its Amplify interim testing (using their Beacon platform) from three times a year in grades three through nine to two times a year, with the third assessment being optional.

V. The Costs of Testing in a Sample District

The following describes the costs to administer the myriad assessments in Council districts. For the purpose of consistency, we profiled the same district that represented the norm in terms of the amount of mandated testing time—Hillsborough County. The district has an enrollment of approximately 200,000 students and a testing budget of about \$2.2 million per year. Table 10 details assessment costs at the district level. This amount constitutes only a small portion of the district's overall annual \$1.8 billion budget—about one-tenth of one percent. The reader should note that a substantial part of the district's assessment budget represents fixed costs. In other words, most large urban districts need resources to comply with various testing requirements and meet assessment needs regardless of the number of tests it administers. For example, most districts will need an assessment manager or director and three to five assessment coordinators, along with one or two warehouse technicians to handle the basics of the testing administration process.

Table 10 shows the testing budget for the Hillsborough County school district. It includes several coordinators for the district's formative testing activities, which are coordinated with English language arts, mathematics, science, social studies and other curriculum department leaders. This division of labor in the assessment department is important because it ensures that locally developed assessments are valid and reliable and are able produce the information needed to inform the instructional process and teacher and leader evaluations.

It should be noted that the personnel costs presented in the table do not include the costs of personnel at the school level to administer the assessments. These costs are generally absorbed into individual school budgets and are not part of the overall district budget. These school-level costs will include the percentage of time an assistant principal or principal devotes to managing and securing tests at the school, the cost of hiring substitute teachers or temporary employees to assist test administration, and the time teachers contribute to assessment implementation. In addition, the data do not include costs associated with administering assessments that principals and teachers administer on their own at the building level.

Finally, the cost of the assessments themselves is about the only variable cost for the assessment division. This cost will depend on the number of students in the district who will be taking the various tests, the number of purchased assessments the district chooses to administer, the number of times a year the test is given, and the portion of the testing costs that is covered by the state. Hillsborough County purchases two nationally normed assessments and uses a number of state-mandated assessments that the state itself pays for. In general, the more tests that an individual district adds to what the federal government and the states require, the more expensive it will be for the district itself.

Student Testing in America's Great City Schools

A recent report by the Brown Center on Education Policy at Brookings estimated that the annual expenditure on assessments across the country is about \$1.7 billion annually.³⁷ Although the number appears high, the report suggests that if these dollars were reinvested in classrooms or teacher raises, the student-teacher ratio would fall by only 0.1 student, and teacher salaries would increase by only \$550 per teacher annually.

Table 10. Sample District Assessment Budget

Personnel	Average Hourly	Average Daily	Average Yearly	Total Fringe	Total Expenses
Assessment Personnel	\$28.67	\$229.39	\$58,035.42	\$137,056.43	\$601,339.77
Test Development Center Staff (EET)	\$32.92	\$262.88	\$66,509.88	\$176,703.45	\$775,292.34
Temporary workers					\$60,274.72
ISAs (contracted teachers/item writers)					\$104,022.07
Assessment Expenses					
Stanford Achievement Test Grade 1 & 2					\$300,000.00
Formative Semester/End-of-Course Exams					\$368,000.00
Total Cost for District Assessment					\$2,208,929
Total District Budget					\$1,810,206,587
Percent of District Budget					0.122%

*EET - Empowering Effective Teachers - Test Development Center staff

³⁷ Chingos, M. (November 2012). Strength in Numbers: State Spending on K-12 Assessment Systems. Washington, D.C.: Brown Center on Education Policy at Brookings.

VI. Parents

According to a poll of urban school parents administered by the Council of the Great City Schools in the fall of 2014, there are mixed feeling about the nature of testing. Sometimes, the vocabulary one uses in asking about testing changes the responses one gets—and whether the assessments are received favorably or not.³⁸

For instance, the sentence, “It is important to have an accurate measure of what my child knows.” is supported or strongly supported by 83 percent of Great City School parents in our polling. (See Figure 27.) In addition, a majority (75 percent) of parents of students attending one of the Great City Schools who earned less than \$25,000 per year agreed or strongly agreed that “accountability for how well my child is educated is important, and it begins with accurate measurement of what he/she is learning in school.” Support jumps to 81 percent among Great City School parents with annual incomes above \$25,000. (Overall, 78 percent agreed with the statement.) Yet this support drops significantly when the word “test” appears, particularly if accountability is defined as assessment results being used for teacher evaluation. This finding was also evident in a recent Phi Delta Kappa/Gallup poll.³⁹ In general, references to “testing” raise concerns about future success since “every child is unique.”

Likewise parents respond more favorably to the need for improving tests over references to more rigorous or harder tests. Wording about “harder” tests or “more rigorous” tests simply do not resonate well with parents. Parents did agree that today’s testing does not work as well as it should in measuring student learning. About 70 percent of parents whose children attend one of the Great City Schools support replacing current tests with “better” tests that “measure what students know.” And some 63 percent of Great City School parents indicated that they believed that testing based on the common core standards should help replace drilling and test prep with “meaningful measurements of what my child knows or needs to know.”

In sum, parents want to know how their own child is doing in school and how testing will help ensure equal access to a high quality education. But the language used in informing and engaging parents around this issue is critical.

These results are consistent with a recent poll by EducationPost that found that a plurality of parents thought that standardized tests are fair and have a positive impact, but also thought that tests are overused and are not necessarily helping their children improve.⁴⁰

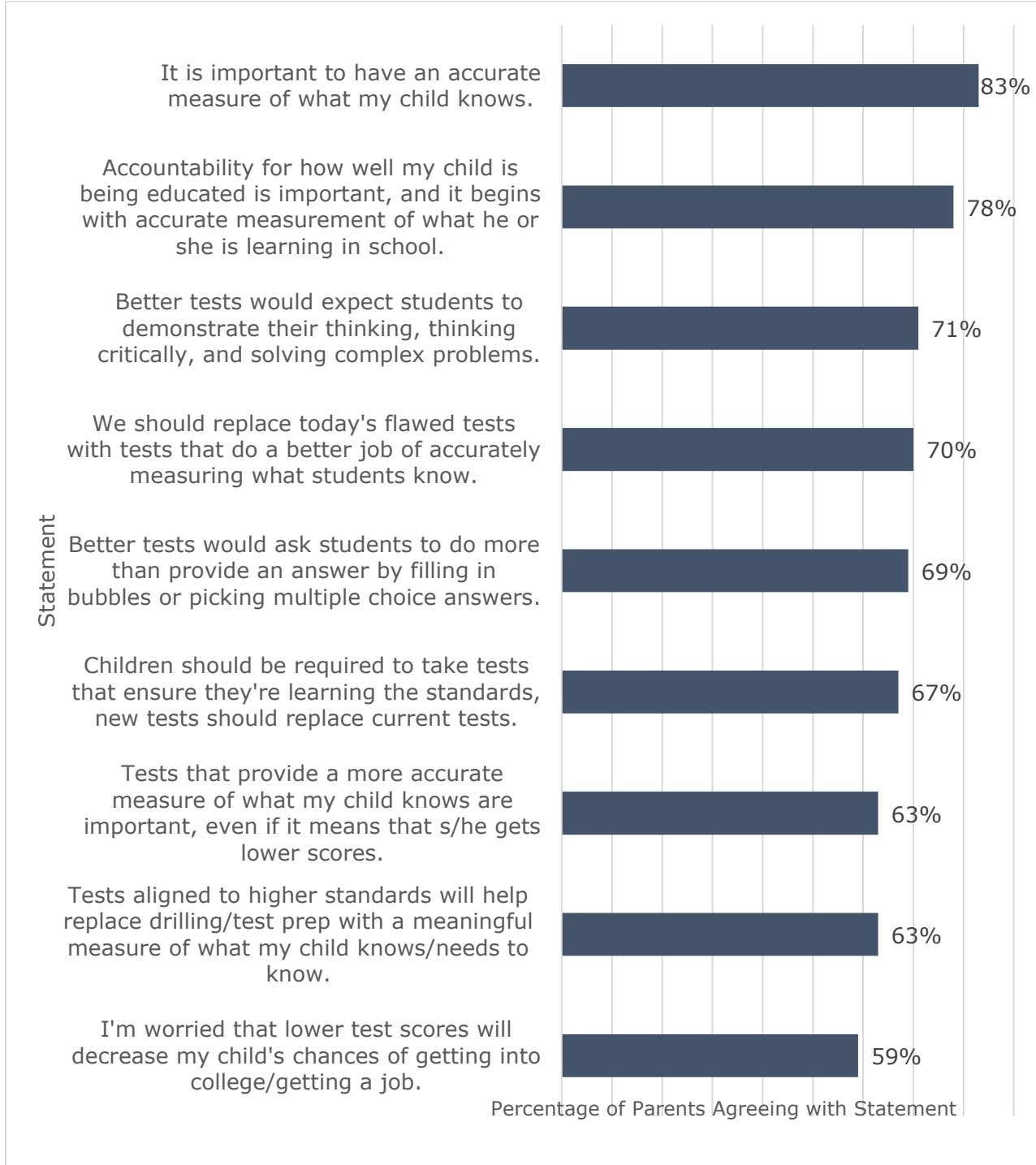
³⁸ Edge Research. *The online survey was conducted by Edge Research and was fielded from August 1 – 8, 2014. The sample included parents whose children attend K-12 schools in Great City districts implementing the Common Core. The final sample included 660 respondents (200 of whom had household incomes of less than \$25,000/year).*

³⁹ Phi Delta Kappa/Gallup Poll of the Public’s Attitudes Toward the Public Schools, 2015.

⁴⁰ Data Mine: Numbers You Can Use (2015). “Parents Support Testing, but Think There’s Too Much”. *U.S. News & World Report*. October 14, 2015

Student Testing in America's Great City Schools

Figure 27. Great City School Parent Perceptions about Testing



Discussion and Preliminary Recommendations

A. Discussion

In this report, the Council has inventoried the assessments that the nation's major city school systems administer. We described the different kinds of tests, whom they were given to, and what they were used for. We worked to determine the origins of those tests, i.e., who actually required them. We determined how much time they took and estimated what they cost. We correlated testing time with reading and math scores. And we presented data on what parents thought of testing.

We can draw a number of broad conclusions from the data we collected and the analysis we conducted.

First, the nation's urban public schools administer a lot of tests. The average student takes roughly 112 tests between pre-K and grade 12. At this point, there is a test for almost everything. For instance, districts have multiple tests for predictions, promotions, diagnostics, accountability, course grades, and the like. The benefit of this is that assessments provide the nation's schools with the tools by which to gather objective data, determine whether they are making progress, and diagnose student needs. Moreover, standardized testing has allowed the nation to shine a light on major inequities under which students of differing racial, language, and income groups struggle. The flip side of this coin is that tests are not always very good at doing what we need them to do, they don't tell us everything that is important about a child, and they don't tell us what to do when results are low. This occurs for a variety of reasons: Data come too late to inform immediate instructional needs; teachers aren't provided the professional development they need on how to read, interpret, and make use of the results in their classrooms; teachers and administrators don't trust the results, believe the tests are of low quality, or think the results are misaligned with the standards they are trying to teach; or the multiple tests provide results that are contradictory or yield too much data to make sense of. The result is that the data from all this testing aren't always used to inform classroom practice. In addition, some students fail to see the multitude of tests as important or relevant, and they do not always put forward their best efforts to do well on them.

Second, students spend a fair amount of time taking tests, but the extent of it really depends on the state, the district, the student's grade level, and their learning needs and aspirations. It was clear from our research that the time needed—on average—to take mandatory tests amounts to about 25 hours or so or between four and five days per school year—about 2.34 percent of a typical 180 day school year. This is not a large portion of a school system's total instructional time. However, in practice, testing time can be divided over more than four or five days, and additional instructional time may be lost in downtime (e.g., state NCLB exams may be given in sections with one subject taking multiple half-days). The total can eat into teachers' and

Student Testing in America's Great City Schools

students' time, particularly if one also takes into account the time necessary to administer the tests and prepare for them. Moreover, much of this testing stacks up in the second half of the school year in a way that makes the second semester seem like one long test.

Third, there is considerable redundancy in the tests that some school systems administer and that some states require. For instance, it was not unusual for school systems to administer multiple summative exams towards the end of the school year that assess student attainment in the same subject. We found this circumstance in districts that gave multiple formative exams to the same students in the same subjects over the course of the year. And we found districts that were giving both summative exams and EOC tests in the same subjects. There is little justification for this practice; it is a waste of time, money, and good will.

Fourth, the vast majority of tests are aligned neither with new college- and career-ready standards nor with each other. We have seen numerous examples where districts gave lots of tests, yielding lots of numbers, but found that they were not anchored to any clear understanding of what the nation, states, or school districts wanted students to know or be able to do in order to be "college- and career-ready." The result is a national educational assessment system that is incoherent and lacks any overarching strategy. Moreover, we think it is worth noting that most tests that schools administer don't actually assess students on any particular content knowledge.

Fifth, the technical quality of the student learning objectives (SLOs) is suspect. It was not within the scope of this study to review the technical quality of all tests that our school systems give, but it was clear to the study team that the SLOs often lacked the comparability, grade-to-grade articulation, and validity that one would want in these instruments. It was also clear that some districts like these assessments because they help build ownership among teachers in the testing process, but one should be clear that the quality of these tools is uneven at best.

Sixth, it is not clear that some of the tests that school districts administer were designed for the purposes for which they are used. The most controversial example is the use of state summative exams to evaluate school district staff when most of these tests were designed to track district and school progress, not individual staff-member proficiency. The Council would argue that test results should play a role in the evaluation of teachers and staff, but gains or losses on these instruments alone cannot be attributed solely to individual teachers or staff members. Still, the failure of these instruments to perform this evaluative role should not be reason not to hold people responsible for student outcomes.

Seventh, the fact that there is no correlation between testing time and student fourth and eighth grade results in reading and math on NAEP does not mean that testing is irrelevant, but it does throw into question the assumption that putting more tests into place will help boost overall student outcomes. In fact, there were notable examples where districts with relatively large amounts of testing time had very weak or stagnant student performance. To be sure, student

Student Testing in America's Great City Schools

scores on a high-level test like NAEP are affected by many more factors than the amount of time students devote to test taking. But the lack of any meaningful correlation should give administrators pause.

Eighth, the amount of money that school districts spend on testing is considerable in absolute dollar terms, but—like the amount of testing time—it constitutes a small portion of a school district's overall budget. The districts on which we have data will typically spend only a small percentage of their district budget on testing, not counting staff time to administer, score, analyze, and report test results. But the more tests local school systems add to what the federal and state governments require, the more expensive it will be for the district.

Finally, parents clearly want to know how their children are progressing academically. They want to know how they compare with other children, and they want accurate measures of whether their children are on track to be successful in college or careers. Most parents probably have little sense of what the metrics of test results are or how to read them, but they do want to know how their children are doing. Our data indicate that parents believe strongly in the notions of accountability for results and equal access to high quality instruction and educational opportunities, but do not necessarily react positively to the language used to describe testing or changes in testing.

B. Preliminary Recommendations and Conclusion

One of the other things that was clear from the analysis conducted by the Council of the Great City Schools is that many urban school systems have begun to rethink their assessment systems to make them more logical and coherent. They have also begun to curtail testing where it is not necessary or useful.

The Council is committed to two things: (1) It will continue to track what our member urban school systems are doing to improve and limit student testing, and (2) the organization is determined to articulate a more thoughtful approach to building assessment systems. Urban school districts generally believe that annual testing of students is a good idea, particularly in a setting where we are working hard to improve student achievement, but the current assessment regime needs to be revised.

The Council recommends the following preliminary steps—

For federal and state policymakers—

- 1) Retain Congressional requirements for states to test all students in reading and math annually on the same tests statewide in grades three through eight and once in high school. These annual tests provide a critical tool for gauging student achievement on a regular basis. But charge states with lowering the amount of time it takes to return assessment results to districts and schools.

Student Testing in America's Great City Schools

- 2) Revisit or clarify the U.S. Department of Education's policy on having student test scores for every teacher's evaluation and the requirement for Student Learning Objectives in untested grades and subjects.
- 3) Expand the U.S. Department of Education's regulations to include a one-year exemption for testing recently arrived English learners with beginning levels of English proficiency.
- 4) Charge the U.S. Department of Education and states with providing and more broadly circulating guidelines on accommodations for students with disabilities who are taking ELP assessments.
- 5) Establish consistency from year to year in the assessments that states develop and require, particularly those tests used for accountability purposes.
- 6) Refrain from applying caps on testing time without also considering issues of quality, redundancy, and testing purposes.

For district leaders--

- 7) Review the entire portfolio of tests that the district gives in order to identify areas where there are redundant assessments. Begin curtailing tests that yield similar results but require additional time.
- 8) Ascertain the technical quality and usage of the tests the district is administering. Begin scaling back on assessments that do not meet professional standards and are not being used for the purposes for which they were designed.
- 9) Review all tests to gauge whether they are aligned to state and district standards—and to each other. If they are not aligned to a standard or benchmark your district has embraced, make sure you understand what the tests are anchored to and what they are actually measuring.
- 10) Revisit assessments, including assessments used for the identification of students for gifted and talented programming to ensure that they are not linguistically, culturally, or racially biased.
- 11) Determine whether or not your portfolio of district assessments is presenting leaders, staff, and teachers with a clear and coherent picture about how students in the district, including students with disabilities, ELLs, and ELLs with disabilities, are doing. Assessments that do not add sufficient detail to that picture might be phased out.
- 12) Pursue assessments strategically that can serve multiple purposes and could replace multiple tests that are currently being given.

Student Testing in America's Great City Schools

In conclusion, assessing the academic performance of students is a critical part of improving our schools and holding leaders and educators accountable for meeting the needs of *all* students. Assessment is also an incredibly complex and, increasingly, controversial undertaking. The results of this study indicate that large city schools—and probably most other kinds of schools—give a variety of tests for a variety of reasons. While it is difficult to know exactly how much testing is too much, we can make some judgments about the amount of testing we found, its redundancies, use, appropriateness, and productivity.

While this report identifies several steps that school districts, in particular, should take to address problems in the current system of assessment, it is clear that the testing requirements faced by America's public schools come from a multitude of sources. In a sense, everyone is culpable to some degree—everyone's "hands are dirty." Whether they know it or not, Congress—not just the Department of Education, the states, or local school systems—has played a large role in increasing testing over the past few decades, adding language to ESEA, IDEA, the Perkins Act, and other legislation that directly contributed to the nature and amount of testing that the nation is now debating. Many of these Congressional requirements were well-intended attempts to hold schools accountable to students, families, and taxpayers for improved results and to determine what works. At the same time, recent attempts to limit testing in the House and Senate versions of the ESEA appear to overlook or forget Congress' role in initiating this assessment-based accountability system in the first place.

For its part, the U.S. Department of Education has also contributed to the situation, particularly over the last several years. Education Department officials readily cite state and local decision making, without much acknowledgement that the administrative policies governing federal initiatives such as Race-to-the-Top and ESEA waivers have also added to the testing burden and the pushback over how testing is used.

The states have also played a role. For the most part, states create, select, or adopt tests after Congress or the U.S. Department of Education mandates that they do so. But states are often too *quick* to change tests or the forms of tests from one year to the next and too *slow* to return the results to schools and school districts. The first problem makes it difficult for policy makers at any level to get comparable data over more than a handful of years to determine whether particular reforms actually worked (e.g., school improvement grants). The second problem mutes the utility of the tests in informing classroom practice and improving student outcomes. At the same time, states often bounce from one testing mandate to another involving end-of-course, formative, and other summative exams without much thought to their redundancy, and they will sometimes require tests that are inappropriate and/or redundant.

To be sure, local school systems, including city school systems on which this study is based, share responsibility for what today's testing portfolio looks like. Too often, the testing regimes they put into place are incoherent, misaligned, redundant, and/or inappropriate. Some of this is the result of others mandating the tests that local school systems should be administering,

Student Testing in America's Great City Schools

but some is the result of district departments that don't share data or wanted their own results. Some of the problem is also due to test publishers and vendors who sold local officials on the shiniest new test because the old one did not provide some level of desired granularity.

We would be remiss if we did not add a word about testing at the school and classroom levels. It was impossible in this initial study to quantify the amount, nature, and quality of testing initiated at the building level, but we are in and out of schools enough to know that principals and teachers often add their own testing and/or substitute testing they prefer for what the state and district require. The practice adds to the incoherence of our system of assessments.

Furthermore, the rise of testing has been fueled by the business community's desire to infuse data into the educational system, the media's distrust of public education's evidence-free assertions that things were improving, and calls by policymakers and civil rights advocates for greater accountability and educational equity. And finally, the paradigm shift from focusing on educational inputs to focusing on outcomes has accelerated the need for measures of those outcomes.

So it is not hard to understand how these testing systems evolved to look like they do today. If there is incoherence, it is because many different actors have added tests for a variety of disconnected reasons. In addition, until the last few years, there have also been no academic standards against which states and school systems could benchmark their assessment practices—or their instruction. Consequently, the various tests that states and school systems used did not need to be aligned or consistent, or to work together in any strategic way. In short, there are many reasons educators have found themselves saddled with the unwieldy, at times illogical, testing system that we have today. And it will take considerable effort to recreate something more intelligent.

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Appendix A. The Federal Role in Assessment Policy

Congress and the U. S. Department of Education

Congress

ESEA

The U.S. Congress has been a participant in determining how much testing occurs in the nation's schools to a greater extent than many realize. At least as far back as the ESEA reauthorization of 1977-78, Congress had a hand in requiring that schools conduct standardized testing for one purpose or another. Typically, Congress does not mandate the use of a particular test, except in the case of NAEP, but it does frequently require that an objective measure of some sort be put into place.

ESEA Reauthorization 1977-78. The 1977-78 reauthorization of ESEA laid the ground work for what eventually would be more extensive Congressional action on testing. This renewal of the main federal elementary and secondary education law specified that "A local educational agency may receive funds under this title (i.e., Title I) only if (1) effective procedures are adopted for evaluating, in accordance the evaluation schedule promulgated by the Commissioner under section 183 (g), the effectiveness of the programs assisted under this title in meeting the special educational needs of educationally deprived children; (2) such evaluations will include, during each three-year period, the collection and analysis of data relating to the degree to which programs assisted under this title have achieved their goals, including the requirements of section 130, and will also include objective measurements of educational achievement in basic skills over at least a twelve-month period in order to determine whether regular school year programs have sustained effects over the summer; and (3) the evaluation will address the purposes of the program, including the requirements of section 130, and the results of the evaluations will be utilized in planning and improving projects and activities carried out under this title in subsequent years."

This language from the 1977-78 reauthorization, which was passed before the establishment of the U.S. Department of Education, pales in comparison to what would come in subsequent renewals of the act, but it did lay out the initial requirements that programs funded under the law would be evaluated every three years using "objective measures of educational attainment in basic skills".

ESEA Reauthorization 1987-88. It was not until the ESEA reauthorization of 1988 that Congress began to wade into issues of educational accountability that were tied to standardized testing. In this case, accountability was tied to the continuation of schoolwide projects that were first authorized by the 1977-78 statute. Under the accountability paragraph of section 1115, the statute states, "If a school meets the accountability requirements in paragraphs (2) and (3) at the end of such (three-year) period, as determined by the State educational agency, that school will be allowed to continue the schoolwide project for an additional 3-year period."

Student Testing in America's Great City Schools

The evaluations section of the law (sec. 1019) would state, “Each local educational agency shall— (1) evaluate the effectiveness of programs assisted under this part, in accordance with national standards developed according to section 1435, at least once every three years (using objective measurement of individual student achievement in basic skills and more advanced skills, aggregated for the local educational agency as a whole) as an indicator of the impact of the program.”

Other sections of the act that year specify that local school systems should “collect data on the race, age, gender, and number of children with handicapping conditions” along with information on student grade-level—although the statute was clear to exempt students who were in preschool, kindergarten, or first grade. The reauthorizations of ESEA over this period demonstrated a clear desire on the part of Congress not only to collect achievement data to evaluate program performance but also to assess student performance. It is impossible to quantify the effects of these requirements on student testing at the state and local levels, but the legislation ran parallel with the increasing use of norm-referenced exams in local school systems.

ESEA Reauthorization 1993-94. The ESEA reauthorization in 1994 saw Congress take the next steps in requiring assessments. Under Title I, Subpart 1—Basic Program requirements, Section 1111, State Plans (b)(3) Assessments, the law stated, “Each State plan shall demonstrate that the State has developed or adopted a set of high-quality, yearly student assessments, including assessments in at least mathematics and reading or language arts, that will be used as the primary means of determining the yearly performance of each local educational agency and school served under this part in enabling all children served under this part to meet the State’s student performance standards. Such assessments shall—(A) be the same assessments used to measure the performance of all children, if the State measures the performance of all children; (B) be aligned with the State’s challenging content and student performance standards and provide coherent information about student attainment of such standards; (C) be used for purposes for which such assessments are valid and reliable, and be consistent with relevant, nationally recognized professional and technical standards for such standards; (D) measure the proficiency of students in the academic subjects in which a State has adopted challenging content and student performance standards and be administered at some time during—(i) grades 3 through 5; (ii) grades 6 through 9; and (iii) grades 10 through 12; (E) involve multiple up-to-date measures of student performance, including measures that assess higher order thinking skills and understanding; (F) provide for— (i) the participation in such assessments of all students; (ii) the reasonable adaptations and accommodations for students with diverse learning needs, necessary to measure the achievement of such students relative to State content standards; and (iii) the inclusion of limited English proficient students who shall be assessed, to the extent practicable in the language and form most likely to yield accurate and reliable information on what such students know and can do, to determine such student’s mastery of skills, in subjects other than English; (G) include students who have attended schools in a local educational agency for a full academic year, however the performance of students who have attended more than one school in the local educational agency

Student Testing in America's Great City Schools

in any academic year shall be used only in determining the progress of the local educational agency; (H) provide individual student interpretive and descriptive reports, which shall include scores, or other information on the attainment of student performance standards; and (I) enable results to be disaggregated within each State, local educational agency, and school by gender, by each major racial and ethnic group, by English proficiency status, by migrant status, by students with disabilities as compared with to nondisabled students, and by economically disadvantaged students as compared to students who are not economically disadvantaged.”

ESEA Reauthorization (NCLB) 2001-02. Not until 2002, however, when No Child Left Behind was signed into law, was Congress so explicit with its testing requirements and how they would be used for accountability purposes. First, the law stipulated that at least 95 percent of students participate annually in state assessments in reading/English language arts and mathematics in grades three through eight and once in high school. States were also mandated to administer three science assessments: once in grades 3-5, once in grades 6-8, and once in high school. Results were to be disaggregated by race, income level, and language status. Explicit targets were formulated, and sanctions were articulated for not meeting prescribed benchmarks.

The law stated, “Academic Assessments—(A) In general.—Each state plan shall demonstrate that the State, in conjunction with local educational agencies, has implemented a set of high-quality, yearly student academic assessments that include, at a minimum, academic assessments in mathematics, reading or language arts, and science that will be used as the primary means of determining the yearly performance of the State and of each local educational agency and school in the State in enabling all children to meet the State’s challenging student academic standards, except that no state shall be required to meet the requirements of this part relating to science assessments until the beginning of the 2007-2008 school year. (B) Use of Assessments.—Each State may incorporate the data from the assessments under this paragraph into a State-developed longitudinal data system that links student test scores, length of enrollment, and graduation records over time. (C) Requirements.—Such assessments shall—(i) be the same academic assessments used to measure the achievement of all children; (ii) be aligned with the State’s challenging academic content and student academic achievement standards, and provide coherent information about student attainment of such standards; (iii) be used for purposes for which such assessments are valid and reliable, and be consistent with relevant, nationally recognized professional and technical standards; (iv) be used only if the State provides to the Secretary evidence from the test publisher or other relevant sources that the assessments used are of adequate technical quality for each purpose required under this Act and are consistent with the requirements of this section, and such evidence is made public by the Secretary upon request; (v)(I) except as otherwise provided for grades 3 through 8 under clause vii, measure the proficiency of students in, at a minimum, mathematics and reading or language arts, and be administered not less than once during—(aa) grades 3 through 5; (bb) grades 6 through 9; and (cc) grades 10 through 12; (II) beginning not later than school year 2007-2008, measure the proficiency of all students in science and be administered not less than one time during—(aa) grades 3 through 5; (bb) grades 6 through 9; and (cc) grades

Student Testing in America's Great City Schools

10-12; (vi) involve multiple up-to-date measures of student academic achievement, including measures that assess higher-order thinking skills and understanding; (vii) beginning not later than school year 2005-2006, measure the achievement of students against the challenging State academic content and student academic achievement standards in each of grades 3 through 8 in, at a minimum, mathematics, and reading or language arts, except that the Secretary may provide the State 1 additional year if the State demonstrates that exceptional or uncontrollable circumstances, such as a natural disaster or a precipitous and unforeseen decline in financial resources of the State, prevented full implementation of the academic assessments by that deadline and that the State will complete implementation within the additional 1-year period:..."

In addition, Title I Part A of the law stipulated that any state receiving Title I Grant funding must participate in the National Assessment of Educational Progress (NAEP). NAEP is administered to a random sample of students at various grade levels (mostly grades 4 and 8) to estimate the nation's academic progress.

The 2001-02 reauthorization of ESEA (NCLB) had a significant effect on the overall amount of testing that was required in the nation's schools. It spurred the use of annual state assessments, the disaggregation of student results, and accountability for results.

Concerns about the amount of testing prompted the U.S. Senate, as part of its deliberations over the 2015 reauthorization of ESEA, to add the following language requiring states to set limits on testing. Section 1111(b)(2)(L) (2) "Academic assessments. (L) Limitation on assessment time.-- (i) In general.--As a condition of receiving an allocation under this part for any fiscal year, each State shall--(I) set a limit on the aggregate amount of time devoted to the administration of assessments (including assessments adopted pursuant to this subsection, other assessments required by the State, and assessments required districtwide by the local educational agency) for each grade, expressed as a percentage of annual instructional hours; and (II) ensure that each local educational agency in the State will notify the parents of each student attending any school in the local educational agency, on an annual basis, whenever the limitation described in subclause (I) is exceeded. (ii) Children with disabilities and English learners.--Nothing in clause (i) shall be construed to supersede the requirements of Federal law relating to assessments that apply specifically to children with disabilities or English learners."

The pending versions of the ESEA reauthorization approved by the House and Senate, respectively, include language that allows parents to opt their children out of testing required under ESEA for any reason or allows parents to opt-out in accordance with state or local laws.

Finally, Congress required under Title I of ESEA that the English proficiency of English Language Learners (also defined as Limited English Proficiency) be assessed. Section 1111 (b)(7) of NCLB of 2002 states, "Academic Assessments of English Language Proficiency—Each State plan shall demonstrate that local educational agencies in the State will, beginning not later than school year 2002-2003, provide for an annual assessment of English proficiency (measuring students' oral

Student Testing in America's Great City Schools

language, reading, and writing skills in English) of all students with limited English proficiency in the schools served by the State educational agency, except that the Secretary may provide the State 1 additional year if the State demonstrates that exceptional or uncontrollable circumstances, such as a natural disaster or a precipitous and unforeseen decline in the financial resources of the State, prevented full implementation of this paragraph by that deadline and that the State will complete implementation within the additional 1-year period.”

IDEA

The second category of Congressional legislation that significantly affected the use of standardized testing in the nation's schools involved the Individuals with Disabilities Education Act (IDEA).⁴¹ In general, the law addresses standardized testing in three ways. First, the law stipulates that most students identified with a disability should take the same educational assessments that are administered to the general population. Second, the law allows states the option of developing alternate assessments for some students. Finally, the law requires assessments to evaluate and reevaluate students when determining their eligibility for special education services.

The latest revision of IDEA became effective in October 2006. The law, as it relates to the participation of students with disabilities in state assessments or alternate assessments, states--

20 U.S.C. * 1412 State Eligibility. “(16) PARTICIPATION IN ASSESSMENTS — (A) IN GENERAL—All children with disabilities are included in all general State and districtwide assessment programs, including assessments described under section Reports. 1111 of the Elementary and Secondary Education Act of 1965, with appropriate accommodations and alternate assessments where necessary and as indicated in their respective individualized education programs. (B) ACCOMMODATION GUIDELINES —The State (or, in the case of a districtwide assessment, the local educational agency) has developed guidelines for the provision of appropriate accommodations. (C) ALTERNATE ASSESSMENTS — (i) IN GENERAL —The State (or, in the case of a districtwide assessment, the local educational agency) has developed and implemented guidelines for the participation of children with disabilities in alternate assessments for those children who cannot participate in regular assessments under subparagraph (A) with accommodations as indicated in their respective individualized education programs. (ii) REQUIREMENTS FOR ALTERNATE ASSESSMENTS — The guidelines under clause (i) shall provide for alternate assessments that—(I) are aligned with the State's challenging academic content standards and challenging student academic achievement standards; and (II) if the State has adopted alternate academic achievement standards permitted under the regulations promulgated to carry out section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, measure the achievement of children with disabilities against those standards. (iii) CONDUCT OF ALTERNATE ASSESSMENTS —The State conducts the alternate assessments described in this subparagraph. (D) REPORTS —The State educational agency (or, in the case of

⁴¹ Individuals with Disabilities Education Act, 20 U.S.C. § 1414 (2004).

Student Testing in America's Great City Schools

a districtwide assessment, the local educational agency) makes available to the public, and reports to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children, the following: (i) The number of children with disabilities participating in regular assessments, and the number of those children who were provided accommodations in order to participate in those assessments. (ii) The number of children with disabilities participating in alternate assessments described in subparagraph C)(ii)(I). (iii) The number of children with disabilities participating in alternate assessments described in subparagraph (C)(ii)(II). (iv) The performance of children with disabilities on regular assessments and on alternate assessments (if the number of children with disabilities participating in those assessments is sufficient to yield statistically reliable information and reporting that information will not reveal personally identifiable information about an individual student), compared with the achievement of all children, including children with disabilities, on those assessments. (E) UNIVERSAL DESIGN—The State educational agency (or, in the case of a districtwide assessment, the local educational agency) shall, to the extent feasible, use universal design principles in developing and administering any assessments under this paragraph.”

In addition, the federal law stipulated that a “local educational agency shall (A) use a variety of assessment tools and strategies to gather relevant functional, developmental, and academic information, including information provided by the parent” to help determine a child’s disability.

These assessments and other tools vary significantly, depending on a student’s disability. Among other assessment guidelines, the law states that a reevaluation of a student should “occur (i) not more frequently than once a year... and (ii) at least once every 3 years, unless the parent and local education agency agree otherwise.”

Specifically, concerning evaluations and reevaluations, IDEA states, “Sec. 614 (b) Evaluation Procedures--(2) Conduct of evaluation. -- In conducting the evaluation, the local educational agency shall (A) use a variety of assessment tools and strategies to gather relevant functional, developmental, and academic information, including information provided by the parent ... (3) Additional requirements.--Each local educational agency shall ensure that--(B) the child is assessed in all areas of suspected disability”.

Regarding general and alternate assessments, IDEA states, “Sec. 614 (d) Individualized Education Programs.--Definitions.--In this title: (A) (i) (VI) (A) (bb) if the IEP Team determines that the child shall take an alternate assessment on a particular State or districtwide assessment of student achievement, a statement of why-- (AA) the child cannot participate in the regular assessment; and (BB) the particular alternate assessments selected is appropriate for the child”.

The variety of assessments and other tools outlined in the law depend on a student’s disability. The law defines a disability as a child with (1) mental retardation, (2) hearing impairments (including deafness), (3) speech or language impairments, (4) visual impairments (including

Student Testing in America's Great City Schools

blindness), (5) emotional disturbance, (6) orthopedic impairments, (7) autism, (8) traumatic brain injury, (9) other health impairments, or (10) specific learning disabilities.

Perkins Act

There are a few accountability requirements for secondary CTE programs under the Perkins Act of 2006 (Perkins IV) that include performance both on the regular state assessment in reading/language arts and mathematics, and on industry-recognized technical assessments in a specific field, if they are “available and appropriate.” These are often third-party assessments, like state and federal licenses and industry certifications.

A state may not have technical skills assessments that are aligned with industry-recognized standards in every CTE program area or subject and for every CTE concentrator. Each state will identify, in Part A, Section VI (Accountability and Evaluation) of its new Perkins IV State plan, the program areas for which the state has technical skills assessments, the estimated percentage of students who will be reported in the state's calculation of CTE concentrators who took assessments, and the state's plan and time frame for increasing the coverage of programs and students reported in this indicator to cover all CTE concentrators and all program areas in the future.

The excerpt from the 2006 Perkins Act outlining the secondary assessment requirements follows. “Section 113(b)(2). Accountability. (b) STATE PERFORMANCE MEASURES. (2) INDICATORS OF PERFORMANCE.—(A) CORE INDICATORS OF PERFORMANCE FOR CAREER AND TECHNICAL EDUCATION STUDENTS AT THE SECONDARY LEVEL.— Each eligible agency shall identify in the State plan core indicators of performance for career and technical education students at the secondary level that are valid and reliable, and that include, at a minimum, measures of each of the following: (i) Student attainment of challenging academic content standards and student academic achievement standards, as adopted by a State in accordance with section 1111(b)(1) of the Elementary and Secondary Education Act of 1965 and measured by the State determined proficient levels on the academic assessments described in section 1111(b)(3) of such Act. (ii) Student attainment of career and technical skill proficiencies, including student achievement on technical assessments that are aligned with industry-recognized standards, if available and appropriate. (iii) Student rates of attainment of each of the following: (I) A secondary school diploma. (II) A General Education Development (GED) credential, or other State-recognized equivalent (including recognized alternate standards for individuals with disabilities). (III) A proficiency credential, certificate, or degree, in conjunction with a secondary school diploma (if such credential, certificate, or degree is offered by the State in conjunction with a secondary school diploma). (iv) Student graduation rates (as described in section 1111(b)(2)(C)(vi) of the Elementary and Secondary Education Act of 1965). (v) Student placement in postsecondary education or advanced training, in military service, or in employment. (vi) Student participation in and completion of career and technical education programs that lead to non-traditional fields.”

Student Testing in America's Great City Schools

U.S. Department of Education

The federal government has collected data on the status of American public education as least as far back as 1870. Much of that early data collection involved such basic features of public schooling as elementary and secondary school enrollment, attendance, numbers of teachers and their average salaries, numbers of high school graduates, and school spending. Over the years, the amount of data collected by the federal government on the nation's public education system has grown substantially. At this point, the U.S. Department of Education administers scores of surveys and employs hundreds of people whose jobs involve the collection of educational data.

Nonetheless, until recently, most of the data collected by the U.S. Department of Education have not involved the mandating of testing, the use of testing data, or the collection of test data. There was an interesting early use of performance data by the Department in the early 1980s in its launching of the "Wall Chart,"⁴² but there is no indication that the chart actually spurred or dampened the use of testing at state or local levels. The most recent agency requirement involving testing, however, has involved the Department of Education's implementation of Congress's "American Recovery and Reinvestment Act" (ARRA), passed in February 2009.

The Act included funding for the Race to the Top fund (RTT) designed to spur educational reform as well as provide a spur to the economy. In November 2009, the U. S. Department of Education announced it was inviting states to apply for competitive grants under the RTT. The RTT made \$4.35 billion in competitive grants available to states and encouraged states to implement comprehensive reform in (1) adopting standards and assessments that prepare students for success in college and the workplace, (2) recruiting, rewarding, and retaining effective teachers and principals, (3) building data systems that measure student success and inform teachers and principals how they can improve their practices, and (4) turning around the lowest-performing schools. The application deadline for the grants was January 19, 2010.

One of the key requirements of the application process was that there would be "no legal barriers at state level to linking student achievement data to teachers and principals for purposes of evaluation." Another involved the definition in the grant announcement of student achievement.

The announcement stated—

"Student achievement means—(a) For tested grades and subjects: (1) A student's score on the State's assessments under the ESEA; and, as appropriate, (2) other measures of student learning, such as those described in paragraph (b) of this definition, provided they are rigorous and comparable across classrooms. (b) For non-tested grades and subjects: Alternative measures of student learning and performance such as scores on pre-tests and end-of-course tests; student

⁴² The Wall Chart included state-by-state data on ACT scores, SAT scores, graduation rates, average teacher salary, federal funds as a percentage of school revenues, the existence of a state compensatory education program, current expenditures per pupil, expenditures as a percentage of income per capita, per capita income, poverty rates for ages 5-17, percentage of students in poverty, median number of years of education of adults in the state, percentage of students who were minority, and percentage of enrollment that was "handicapped." (January 1984)

Student Testing in America's Great City Schools

performance on English language proficiency assessments; and other measures of student achievement that are rigorous and comparable across classrooms. Student growth means the change in student achievement (as defined in this notice) for an individual student between two points in time. A state may also include other measures that are rigorous and comparable across classrooms (p.59806).⁴³

In all, 41 states submitted applications for RTT during the first phase of the grant application process. Only two were funded in Phase 1, but all 41 began to move in the direction of reforming educational policy based on stipulations in the grant application.

The relationship between RTT announcements, state decisions to submit an RTT application, and changes in state legislation were not coincidental. In fact, Table A-1 below documents that a number of states submitted RTT grant applications immediately after or before changing state policies regarding teacher evaluation. For example, Louisiana, after their Phase 1 RTT proposal was not funded, introduced HB1033 on March 19, 2010. The bill was signed into law on May 27, 2010, and the state submitted its Phase 2 RTT application the next day, May 28, 2010. In Maryland, prior to applying for Phase 2 funding, SB 275 and HB 1263 were both signed into law on May 4, 2010 and their phase 2 application was submitted on May 27, 2010.

Moreover, some states that were not successful in winning RTT grants still passed legislation reforming teacher and administrator evaluations. In Connecticut, for example, state reform legislation was signed into law on May 26, 2010—one day before the state's Phase 2 RTT application was submitted—but the state never received an RTT award. Indiana passed legislation related to staff performance evaluations in April 2011. These and other states never received RTT awards; however, in their attempts to receive funds, the application process spurred state legislation that resulted in the implementation of new evaluation systems.

If states did not make changes involving new education reforms—teacher and administrator evaluations and assessments—in their quest for RTT, then many did a year or two later when applying for ESEA flexibility or waivers from NCLB's accountability requirements. The language in the Department of Education's waiver policy⁴⁴ in defining student achievement and student growth was almost identical to the language provided in the RTT guidance. The only difference between the language in RTT and the waiver policy involved acceptable assessments for grades and subjects not required under ESEA. The new language referred to "...pre-tests, end-of-course tests, and objective performance-based assessments, student learning objectives, student performance on English language proficiency assessments; and other measures of student achievement that are rigorous and comparable across schools within an LEA" (p.7) This language guided state applications for ESEA waivers in the same way that it guided RTT applications. Some

⁴³ Race to the Top Fund, 74 Federal Register. 221 (Wednesday, November 18, 2009)(to be codified at 34 CFR Subtitle B, Chapter II).

⁴⁴ ESEA Flexibility Policy Document (June 7, 2012). Retrieved from <http://www2.ed.gov/policy/elsec/guid/esea-flexibility/index.html>.

Student Testing in America's Great City Schools

43 states and the District of Columbia have received ESEA flexibility waivers, and two more—Iowa and Wyoming—have applied and are under review. In applying for waivers, states often used the same or similar language on issues of teacher and administrator evaluation and assessments as they did in applying for RTT.

This pattern in the use of language in many of the state grant and waiver applications regarding new teacher and principal evaluations was consistent. The Maryland HB 1263 Education Reform Act of 2010 calls for data on student growth to be a significant component of the evaluation. The State Board passed regulations that defined a “significant component” to mean that 50 percent of an evaluation must be based on student growth. Much like the Race to the Top definition of student growth, the statute and regulations defined student growth to mean “student progress assessed by multiple measures and from a clearly articulated baseline to one or more points in time.” The regulations established that all teachers will be evaluated annually and that the rating scale will be, at a minimum, Highly Effective, Effective, or Ineffective.

In North Carolina, prior to its submission of its Phase 1 RTT application, the state board chairman and state school superintendent asserted that, as part of approving their Race to the Top application:

- The North Carolina State Board of Education agrees to commit North Carolina to using student achievement growth data as a significant part of teacher and principal evaluation, after undergoing a process engaging all stakeholders to determine a valid, fair, and reliable way to do so.
- The North Carolina State Board of Education approves of the Regional Leadership Academies for principal certification.
- The North Carolina State Board of Education endorses North Carolina working in collaboration with other states on formative, benchmark, diagnostic, and summative assessments based upon the Common Core standards.

The pattern across all states submitting RTT applications was consistent in implementing the reform models called for in RTT. All of the RTT grant and ESEA flexibility applications contained language that committed the states to developing formative assessments or end-of-course assessments. However, the language required of all applicants, which eventually became the language of state legislation, stipulated that a “significant component” or 50 percent of personnel evaluation must be based on student growth, and it was this language that significantly influenced the amount of testing along with requirements that students should be tested for purposes of teacher evaluation in otherwise non-tested grades and subjects. States implementing Race-to-the-Top, approving legislation to qualify for RTT, or applying for ESEA waivers often required that every teacher and principal be evaluated based on student achievement, so a plethora of student achievement measures needed to be developed for teachers in grade levels and subject areas that had not traditionally been tested.

Student Testing in America's Great City Schools

The result was the addition across the country of end-of-course exams, formative assessments, student learning objectives, computer adaptive assessments, and the like. Examples included Maryland, Georgia, Hawaii, and New Jersey in adding formative assessments; and Georgia, New Mexico, Nevada, and Missouri in adding end-of-course exams or student learning objectives. The bulk of these assessments have been implemented to satisfy state regulations and laws for teacher and principal evaluation driven by and approved by U.S. Department of Education policies, signaling to all interested states that this language was what the Department was looking for.

Overview of State Legislation and Race to the Top/ESEA Waiver Activity

State	State Legislation	Race to the Top Submission/Approval	ESEA Waiver Submission/Approval
Alabama	State Board of Education passes Educator Effectiveness Resolution establishing student learning results as predominant measure of teacher and principal effectiveness	Phase 1 application initially submitted on 1/19/2010	Application submitted 9/6/2012; Approved 6/12/2013
		Phase 2 RTT Fund Application submitted 5/28/2010	
		State never awarded RTT grant	
Alaska	State Board of Education adopts Teacher Evaluation regulations to incorporate student learning data in teacher evaluations; Adopted 12/7/2012		Application submitted 9/6/2012; Approved 5/20/2013
California	SB 19: Introduced 12/01/2008; Passed 10/11/2009. Designed to allow teacher data system and student data system to be used in conjunction to measure teacher effectiveness.	Phase 1 application initially submitted on 1/19/2010.	
		Phase 2 RTT Application submitted 6/1/2010	
		State never awarded RTT grant	
Connecticut	SB 438 Public Act No 10-111 - An Act Concerning Education Reform In Connecticut - introduces teacher and principal evaluation; Introduced 3/10/2010; Signed into law 5/26/ 2010	Phase 1 application initially submitted on 1/15/ 2010	Application submitted 2/11/2011; Approved 5/28/012

Student Testing in America's Great City Schools

	State Board of Education adopts guidelines for model teacher and administrator evaluation, which include student achievement results	Phase 2 RTT Application submitted 5/27 2010	
		State never awarded RTT grant	
Colorado	Executive Order Creating Governor's Council for Educator Effectiveness on 1/13/2010	Phase 1 application initially submitted on 1/13/2010	Application submitted 11/14/2011; Approved 2/9/2012
	Senate Bill 10-191; Introduced 4/12/ 2010; Passed in 5/20/2010	Phase 2 RTT Application submitted 5/26/2010	
		Awarded in 12/11/2011 in third round of RTT	
		Submitted 11/28/ 2012; Approved 12/29/2012 (amended)	
District of Columbia	Fall 2008 - DCPS started development of the IMPACT Teacher Evaluation system (district policy)	Phase 1 application initially submitted on 1/19/2010	Application submitted 2/28/2012; Approved 7/19/2012
	10/1/2009- IMPACT Teacher Evaluation system announced (district policy)	Phase 2 RTT application submitted 6/1/ 2010	Amendment submitted 7/11/2012; Approved 2/22/2013
		Awarded 8/24/2010 in second round of RTT	
Florida	SB 736 Student Success Act - Educational Personnel; Introduced 1/31/ 2011; Passed in 3/24/2011	Phase 1 application initially submitted on 1/19/2010	Application submitted 11/14/2011 and approved 2/9/2012
		Phase 2 RTT application submitted 5/28/2010	
		Awarded 8/24/2010 in second round of RTT	
Georgia	HB 244 ESEA annual performance evaluations; Introduced 1/31/2011; Passed in 3/24/ 2011	Phase 1 application initially submitted on 1/19/2010	Application submitted 11/14/2011; Approved 2/9/2012
		Phase 2 RTT Application submitted 6/1/2010	
		Awarded 8/24/2010 in second round of RTT	
Hawaii	Board Policy 2055 Teacher and Principal Performance Evaluation passes 4/17/2012	Phase 1 application initially submitted on 1/19/2010	Application submitted 9/6/2012; Approved 5/20/2013
		Phase 2 RTT Application submitted	

Student Testing in America's Great City Schools

		5/27/2010	
		Awarded 8/24/2010 in second round of RTT	
Illinois	SB0315 – amended to update teacher and principal evaluations to include student achievement; Introduced 1/11/2010; Passed 1/15/2010	Phase 1 application submitted 1/19/2010	Application submitted 2/23/2012; Approved 4/18/14
		Phase 2 application submitted 6/1/2010	
		Awarded RTT Phase 3 on 12/22/2011	
Indiana	SB 0001 - includes chapter on Staff Performance Evaluations; Introduced 1/20/2011; Signed into law 4/30/2011	Phase I application initially submitted on 1/19/2010	Application submitted 11/14/2011; Approved 2/9/2012
		State never awarded RTT grant	
Iowa		Phase 1 application initially submitted on 1/19/2010	Application submitted 2/28/2012; request is under review
		Phase 2 RTT Application submitted 5/25/2010	
		State never awarded RTT grant	
Kansas		Phase 1 submission 1/18/2010	Application submitted 2/28/2012; Approved 6/19/2012
		State never awarded RTT grant	
Kentucky	Senate Bill One; Introduced 2/3/2009; Passed in 3/25/2009	Application initially submitted in July 2010	Application submitted 11/14/2011; Approved 2/9/2012
	House Bill 180; Introduced 2/5/2013; Signed 3/21/2013	Awarded in 12/23/2011 in third round of RTT	Amended 9/28/2012 and 8/14/2014
Louisiana	HB 1033; Introduced 3/19/2010; Signed into law 5/27/2010	Phase 1 application submitted 1/18/2010	Application submitted 2/28/2012; Approved 5/29/2012
	HB 974; Introduced 3/2/2012; Signed into law 4/18/2012	Phase 2 application submitted 5/28/2010	
		Awarded RTT Phase 3 on 12/22/2011	
Maryland	SB 275 – Maryland Longitudinal Data System; Introduced 1/22/2010; Signed 5/4/2010	Phase 2 application submitted 5/27/2010	Application submitted 2/28/2012; Approved 5/29/2012
	HB 1263 – Education Reform Act of 2010; Introduced 2/18/2010; Signed 5/4/2010	Awarded RTT Phase 2 on 8/24/2010	

Student Testing in America's Great City Schools

Massachusetts	Chapter 12 – An Act Relative to the Achievement Gap; Signed 1/19/2010	Phase 1 application submitted 1/18/2010	Application submitted 11/4/2011; Approved 2/9/2012
		Phase 2 application submitted 5/28/2010	
		Awarded RTT Phase 2 on 8/24/2010	
Michigan	SB 0981 – public school academies; schools of excellence as new type of public school academy, certain evaluations of public school employees, certain revisions for existing public school academies, and school administrator certification; Introduced 11/10/2009; Signed 12/31/2009	Phase 1 submission 1/15/2010	Application submitted 2/28/2012; Approved 7/19/2012
	SB1509 - Education; teachers; teacher performance evaluation system; modify implementation requirements; Introduced 9/23/2010; Effective 12/21/2010	Phase 2 submission 5/11/2010	
		State never awarded RTT grant	
Minnesota	Minn Stat § 123B045 – District-Created Site-governed Schools; Signed 9/11/2009	Phase 1 submission 1/18/2010	Application submitted 11/14/2011; Approved 2/9/2012
	SF0040 – Alternative teacher preparation program; Introduced 1/13/2010; Signed 3/10/2014		
Mississippi	HB 502 established that 50% of teacher and principal evaluation shall be comprised of student achievement data; Introduced 1/20/2014; Bill died	Phase 2 submission 5/27/2010	Application submitted 2/28/2012; Approved 7/19/2012
		State never awarded RTT grant	
Missouri	State Board of Education approves Missouri's Educator Evaluation System; Signed 6/2012	Phase 1 submission 1/18/2010	Application submitted 2/28/2012; Approved 6/29/2012
		Phase 2 submission 5/25/2010	
Nevada	SB 2 – Nevada introduces bill to eliminate prohibition on the use of certain accountability information concerning pupils	Phase 2 submission 5/28/2010 (proposal included end-of-course exams and teacher	Application submitted 2/28/2012; Approved 8/8/2012

Student Testing in America's Great City Schools

	for the evaluation of teachers, paraprofessionals and other employees [for RTT eligibility]; Introduced 2/10/2010; Passed 3/10/2010	evaluation based on student performance	
	AB 229 – revises teacher evaluation requiring 50% of performance evaluation based on student achievement; introduces performance pay; Introduced 3/2/2011; Signed 6/15/2011	State never awarded RTT grant	
New Jersey	S1455 – TEACHNJ Act; Introduced 2/6/2012; Signed 8/6/2012	Phase 2 submission 6/1/2010	Application submitted 11/14/2011; Approved 2/9/2012
	A4168/S2881 – School Children First Act modified the evaluation of teacher and principals including revising tenure acquisition and eliminating seniority rights; Introduced 6/23/11 and 5/19/11; Bill Died	Phase 3 submission 11/21/2011	
	S3173 – Urban Hope Act; Introduced 12/15/2011; Signed 1/12/2012	Awarded Phase 3 RTT 12/23/2011	
New Mexico	SB 502 - Teacher and Principal Evaluation; Introduced 2/15/2011; Bill did not pass	Phase 1 submission 1/19/2010	Application submitted 11/14/2011; Approved 2/15/2012
	Executive Order 2011-024 issued—created New Mexico Effective Teaching Task Force; Introduced 4/25/2011; Signed 11/10/2011	Phase 2 submission 6/1/2010	
	HB 249 - Teacher & School Leader Effectiveness Act; Introduced 1/27/2012; Died - last action 2/14/2012, passed House	State never awarded RTT grant	
	Governor directs state department of education to carry out new teacher evaluation system on 4/11/2012		
New York	11171 - Teacher and Principal Evaluation and Educational Partnership Organizations; Included measures of student achievement in evaluation process where applicable;	Phase 1 submission 1/19/2010	Application submitted 2/28/2012; Approved 5/29/2012

Student Testing in America's Great City Schools

	Introduced 5/21/10; Signed 5/28/10		
		Phase 2 submission 6/1/2010	
		Awarded Phase 2	
North Carolina	State Board of Education commits to using student achievement growth data as a significant portion of teacher and principal evaluations The Board also endorsed collaboration with other states on formative, benchmark, diagnostic, and summative assessments based on the common core; Signed 1/6/2010	Phase 1 submission 1/19/2010	Application submitted 2/28/2012; Approved 5/29/2012
	SESSION LAW 2011-280 Made funds available to require all 11th grade students to take the ACT Also added a component for LEA to make available Work Keys for students who complete the second level of vocational classes; Passed 6/23/2011	Phase 2 submission 6/1/2010	
		Awarded Phase 2 9/24/2010	
Ohio	House Bill 1 adopted new standards, developed assessments that align with common core; introduced measures to use academic improvement for evaluation; Introduced 2/2009; Signed 12/2009	Phase 1 submission 1/19/2010	Application submitted 2/28/2012; Approved 5/29/2012
		Phase 2 submission 6/1/2010	
		Awarded Phase 2 9/24/2010	
Pennsylvania		Phase 1 submission 1/19/2010	Application submitted 2/28/2013; Approved 8/20/2013
		Phase 2 submission 6/1/2010	
		Phase 3 submission 11/7/2011	
		Awarded Phase 3 12/22/2011	

Student Testing in America's Great City Schools

Rhode Island	RIDE Strategic Plan to create formative assessments, interim assessments, and a district wide evaluation system with SLOs; Introduced 9/2009; Signed 1/7/2010, approved by the Board of Regents	Phase 1 submission 1/19/2010	Application submitted 2/28/2012; Approved 5/29/2012
		Phase 2 submission 6/1/2010	
		Awarded Phase 2 9/24/2010	
Tennessee	First to the Top HB 7010 and SB7005 to use student achievement data from only one year to make evaluations, student achievement data to judge teacher prep programs, turn around school achievement district; Introduced 1/12/2010; Signed 1/27/2010	Phase 1 submission 1/19/2010	Application submitted 11/14/2011; Approved 2/9/2012
		Awarded Phase 1 03/29/2010	
Texas			Application submitted 4/15/2013; Approved 9/30/2013
Virginia	State Board of Education revised the Uniform Performance Standards and Evaluation Criteria for Teachers and Principals; Introduced 2010; Approved by the Virginia Board of Education 4/28/2011	Phase 1 submission 1/15/2010	Application submitted 7/19/2012; Approved 7/24/2012
		State never awarded RTT grant	
Washington	ESSB 6696 – Authorized creation of new accountability system and created the Teacher and Principal Evaluation Projects (TPEP); Introduced 2/9/2010; Approved 3/29/2010	Phase 2 submission 6/1/2010	Application submitted 2/28/2012; Approved 7/6/2012
	ESSB 5859 – Adds specificity to ESSB 6696 and requires the use of student growth in teacher and principal evaluations; Introduced 2/28/2011; Approved 3/8/2012	State never awarded RTT grant	

Student Testing in America's Great City Schools

Wisconsin	SB 372 established that teacher evaluations may incorporate results of student examinations; Introduced 10/28/2009; Signed 11/9/2009	Phase 1 submission 1/19/2010	Application submitted 2/12/2012; Approved 6/6/2012
	SB 461 established student performance measures as 50% of teacher and principal evaluation score; Introduced 2/10/2012; Signed 4/2/2012	Phase 2 submission 6/1/2010	
		State never awarded RTT grant	

Appendix B. Mandated Tests by District

Student Testing in America's Great City Schools

School District	State	NCLB State Assessments	End-of-Course Exams	Formative Assessments	Student Learning Objectives (SLOs)
Albuquerque Public Schools	NM	√	√	√	
Anchorage School District	AK	√	√		
Atlanta Public Schools	GA	√	√	√	√
Austin Independent School District	TX	√	√		√
Baltimore City Public Schools	MD	√	√		√
Birmingham City Public Schools	AL	√	√	√	
Boston Public Schools	MA	√		√	
Bridgeport Public Schools	CT	√			
Broward County Public Schools	FL	√	√	√	
Buffalo Public Schools	NY	√		√	√
Charleston Public Schools	SC	√	√		
Charlotte-Mecklenburg Public Schools	NC	√	√	√	
Cincinnati Public Schools	OH	√	√		
Chicago Public Schools	IL	√			√
Clark County School District	NV	√	√		
Cleveland Municipal School District	OH	√	√		√
Columbus City School District	OH	√	√		√
Miami-Dade County Public Schools	FL	√	√	√	√
Dallas Independent School District	TX	√	√		
Nashville-Davidson County Public Schools	TN	√	√		
Dayton City School District	OH	√	√		√
Denver Public Schools	CO	√			√
Des Moines Independent Community School District	IA	√		√	
Detroit City School District	MI	√	√		

Student Testing in America's Great City Schools

District of Columbia Public Schools	DC	√		√	
Duval County Public Schools	FL	√	√	√	√
East Baton Rouge Parish Public Schools	LA	√	√		
El Paso Independent School District	TX	√	√		
Fort Worth Independent School District	TX	√	√		
Fresno Unified School District	CA	√		√	
Guilford County Public Schools	NC	√	√	√	√
Hawaii State Department of Education	HI	√	√		
Hillsborough County Public Schools	FL	√	√	√	√
Houston Independent School District	TX	√	√	√	
Indianapolis Public Schools	IN	√	√	√	√
Jackson Public Schools	MS	√	√	√	√
Jefferson County Public Schools	KY	√	√	√	√
Kansas City (MO) Public Schools	MO	√	√	√	
Long Beach Unified School District	CA	√		√	
Los Angeles Unified School District	CA	√		√	
Milwaukee Public Schools	WI	√			√
Minneapolis Public School District	MN	√	√		
New York City Department of Education	NY	√		√	
Newark Public Schools	NJ	√	√		
Norfolk Public Schools	VA	√	√	√	√
Oakland Unified School District	CA	√	√	√	
Oklahoma City Public Schools	OK	√	√	√	
Omaha Public Schools	NE	√			
Orange County Public Schools	FL	√	√	√	√
Palm Beach County Public Schools	FL	√	√	√	

Student Testing in America's Great City Schools

Philadelphia School District	PA	√	√		√
Pittsburgh School District	PA	√	√		√
Portland Public Schools	OR	√			
Providence Public Schools	RI	√			
Richmond City Public Schools	VA	√	√		√
Rochester City School District	NY	√			√
Sacramento City Unified School District	CA	√		√	
San Diego Unified School District	CA	√	√	√	
San Francisco Unified School District	CA	√		√	
Santa Ana Unified School District	CA	√			
Seattle Public Schools	WA	√	√	√	√
Shelby County (Memphis) Public Schools	TN	√	√		
St. Louis City Public Schools	MO	√	√		
St. Paul Public Schools	MN	√	√	√	
Toledo City School District	OH	√	√	√	√
Wichita Public Schools	KS	√	√		
All Districts		100.00%	71.2%	59.1%	37.9%

Student Testing in America's Great City Schools

Council of the Great City Schools

The Council of the Great City Schools is a coalition of 68 of the nation's largest urban public school systems. Its board of directors is composed of the superintendent of schools and one school board member from each member city. An Executive Committee of 24 individuals, equally divided in number between superintendents and school board members, provides regular oversight of the 501(c) (3) organization. The mission of the Council is to advocate for urban public education and assist its members in the improvement of leadership and instruction. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group convenes two major conferences each year; conducts research and studies on urban school conditions and trends; and operates ongoing networks of senior school district managers with responsibilities in areas such as federal programs, operations, finance, personnel, communications, research, and technology. The Council was founded in 1956 and incorporated in 1961 and has its headquarters in Washington, DC.

Chair of the Board

**Richard Carranza, Superintendent
San Francisco Unified School District**

Chair-elect of the Board

**Felton Williams, School Board President
Long Beach Unified School District**

Secretary/Treasurer

**Kaya Henderson, Chancellor
District of Columbia Public Schools**

Immediate Past Chair

**Jumoke Hinton Hodge, School Board Member
Oakland Unified School District**

Executive Director

Michael Casserly

RESEARCH PLAN

COUNCIL OF THE GREAT CITY SCHOOLS RESEARCH DEPARTMENT PROJECT PLAN

March 19, 2016

OVERVIEW OF RESEARCH PLANS

1. Analysis of Student Performance in State Recovery School Districts: Examining Data from Tennessee and Michigan

This project is expected to take 7 months and will include two major reviews:

1. The research team will analyze longitudinal student achievement data from state assessments for recovery/achievement school district students and public school students across two states and districts. This will include analysis of school performance and demographic composition (race, family income, ELL status, SWD status, etc.) prior to the transition of schools to state recovery status and post-transition. The analysis will include a study of the differences in student populations of the current schools compared to their population prior to becoming recovery schools.

a. Project Timeline

The timeline for this project includes the following:

- Quantitative data collection and analysis – school performance data, demographic data, etc. – 3 months
- Qualitative data collection and analysis – closure trends, parent perceptions of new schools, administrator perceptions of the new districts, etc. – 3 months
- Final Report – 1 months

2. Analysis of the Influence and Impact of Charter Schools on Student Achievement and Urban School Districts

This project is expected to take 18 months and will include two major reviews:

2. The research team will analyze student achievement data from the National Assessment of Educational Progress and state assessment results (where available) comparing longitudinal school performance for charter school students and public school students across states and districts. This will include analysis of charter and public school performance and student group composition (race, family income, ELL status, SWD status, etc.) and by authorizing agent among charter schools (district, state, university, etc.). The analysis will include a study of the differences in student populations of charter schools compared to public schools and differences in funding levels and accountability systems. Finally, the research will explore other characteristics of charter schools including the contents of charter contracts with states and districts, consequences of failing to meet charter contract or funding expectations (e.g., closure, probation, etc.), and finally, the factors that influence parental school choice.

a. Project Timeline

The timeline for this project includes the following:

- Quantitative data collection and analysis – school performance data, demographic data, etc. – 6 months

- Qualitative data collection and analysis – closure trends, parent perceptions of choice, etc. – 9 months
- Final Report – 3 months

3. Compilation of District and Council Evidence Based Research to support District Implementation of the Every Student Succeeds Act

This project is expected to take 6 months to launch and will continue indefinitely to include:

1. The development/use of a searchable research repository for Council district research studies on various research topics to include, but not limited to:
 - a. The effects of intervention programs on student achievement and graduation rates
 - b. Pre-K educational effects – including analysis by various pre-K funding sources where available (e.g. Head Start, state funded pre-K, etc.)
 - c. Teacher effects on student achievement including, but not limited to:
 - i. Teacher race and student achievement
 - ii. Teacher evaluation systems and student achievement
 - iii. Student achievement as a function of moving high performing teachers into low performing schools
 - d. Improving student achievement for student groups including, but not limited to:
 - i. English language learners
 - ii. Students with disabilities
 - iii. Males of color

a. Project Timeline

The timeline for this project includes the following:

- Selection/design of searchable research repository – 3 months
- Promotion of availability and population of repository by Council and district research offices – 3 months
- Demonstration of Repository and initial contents – CGCS Fall Conference in October, 2016

4. Ongoing survey research including, but not limited to:

- **Survey of Ethnic/Culturally Competent Curriculum Efforts**
- **Survey on Supporting the Implementation of the Common Core/College- and Career-Ready Standards**
- **Survey on Systemic Review of School Funding Practices**

a. Project Timeline

Our project timelines for our various surveys are fluid and dependent on the scope and depth of each survey. Timelines vary from 6 months to 2 years depending on the nature of the survey items, data collection and analysis needs.

ACHIEVEMENT TASK FORCE

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Achievement

2015-2016

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

Eric Gordon, Cleveland CEO
Paula Wright, Duval County School Board

ACADEMICS DEPARTMENT OVERVIEW



Academic Department Overview

March 2016

Overall Academic Department Goals/Priorities

The goal of the academic department is to support the work of urban educators 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 on-site 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 and college and career-readiness standards. This includes testing the functionality of academic key performance indicators, providing additional opportunities for regional networking as districts implement standards, and piloting tools for alignment of instructional materials.

Current Activities/Projects

➤ *Implementing Excellence and Equity Grant*

Overview

As part of the five-component \$1.6 million two-year grant from the Bill and Melinda Gates Foundation received in November of 2015, the Academic team is participating in all components and taking the lead in the following two areas.

In the first area, the grant will enable us to establish strategic partners and content advisory committees that include district instructional staff, principal supervisors, and representatives from Student Achievement Partners in order to develop a curriculum framework. This framework will be aligned to Common Core State Standards and appropriate for all college and career-readiness standards. We will identify and reach consensus around elements and key criteria that would enable districts to ensure that their curriculum is capable of guiding teachers so that students successfully attain or exceed the standards. Member districts will have multiple opportunities to provide feedback on the curriculum framework tool, and the Council will provide professional development on its use and its implications for curriculum implementation, teaching and learning, and student achievement.

In the second area, the Council will extend its technical assistance to Southern city school systems that were involved in a previous Southern Educational Foundation grant. This

regional work will begin with a survey on the leading challenges these districts face in addressing achievement gaps in implementing college- and career-readiness standards for all students. Working webinars and two meetings will take place to provide districts with an opportunity to discuss common challenges, share strategies and promising practices and to build a sustainable Southern regional support network. Based on our analysis of survey results, we will conduct a small number of on-site strategic support team visits. This regional support may become a model for future expansion.

➤ ***Wallace Foundation Principal Supervisor (PSI) Initiative***

Project staff is currently conducting a second round of follow-up visits to PSI districts, to be finished by April 2016. The lineup of visits includes: Broward County (February 8-9); Cleveland Metropolitan School District (February 11-12); Long Beach Unified School District (February 16-17); District of Columbia Public Schools (March 16-17); Tulsa Public Schools (April 4-5); Minneapolis Public Schools (April 19-20); Des Moines Public Schools (April 21-22). Based on both the first and second round of site visits, the project team will develop a report detailing shared themes, observations, and promising practices in the reform of school support structures.

Additionally, as a request following a Wallace site visit, the Council arranged a consultative webinar on January 19, 2016 to review and discuss master scheduling options for one of our member districts. This webinar was facilitated by the Council's academic staff and included representatives from member districts who have extensive experience with master scheduling.

➤ ***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 met to engage members in drafting KPIs for general education, special education, and English language learners.

Update

The list of 200 potential KPIs were narrowed and prioritized. Indicators, where possible, link to costs and/or outcomes. A pilot survey form gathered district data from volunteer districts checking the clarity of data requests and the usefulness of initial academic key performance indicators. Draft reporting data graphs were presented to the Achievement Task Force at the March Legislative Conference, and were discussed at the Curriculum and Research Directors Meeting, July 2015.

These indicators were discussed at the Achievement and Professional Development Taskforce on October 6, 2015 to narrow the number of indicators to those that members value for their predictive ability as well indicators of cost, and those that link to progress measures for the Minority Male Initiative pledge.

During 2016, progress measures for the Minority Male Initiative pledge and academic predictive indicators will become part of the annual KPI data collection and reporting.

This will enable districts to compare their performance with similar urban districts and network to improve solutions to shared challenges.

➤ ***Implementing the Common Core State Standards and College- and Career-Readiness Standards***

Overview

The Council has long advocated for shared standards across states and has received several grants to assist our members in implementing the new K-12 standards in mathematics, English language arts and literacy, and science. The funding from these grants are used to enhance the Council's academic support to members and to create and share a powerful selection of tools and videos for internal and external stakeholders.

Gates Working Groups Grant

The Council received a 2014 grant from the Bill and Melinda Gates Foundation to help districts align common core implementation with other key reforms in effective teaching, as well as with efforts to prepare for new online assessments aligned to college and career-readiness standards. The project brought together cross-functional teams of academic, research, assessment, technology, and operations staff from member school systems supported by Council staff. The Council also identified experts in key areas that could advance the work and an external consultant for project management.

The first working group developed recommendations published as *Implementing the Common Core Assessments: Challenges and Recommendations* with recommendations for districts that administer on-line tests by PARCC or Smarter Balanced. This document provides a summary of the PARCC and SBAC assessments, challenges in implementing large scale on-line assessment, and recommendations for successfully implementing them and is available on the CGCS website.

The second working group convened to discuss and inform the development of indicators districts might use to track their progress on implementation of college- and career-readiness standards. The draft of this document was shared for member comments and feedback at the Achievement and Professional Development Taskforce Meeting in October 2015 and a revised draft will be presented at the Taskforce Meeting at the Legislative Conference in March 2016.

Hewlett Grant for the development of Grade-Level Instructional Materials Tool--Quality Review (GIMET-QR)

Using a 2013 grant from the Hewlett Foundation, the Council developed and published 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 sets of materials best fit their needs. They will also help districts determine 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.

While GIMET-QR was designed to support textbook materials adoption, feedback from Council members using the tool indicates that there are additional uses:

1) to assess alignment and identify gaps/omissions in current instructional materials; 2) to assess alignment of district scope and sequence, and the rigor and quality of instructional tasks and assessments; and 3) to provide professional development that builds capacity and a shared understanding of the CCSS in ELA/Literacy and/or Mathematics. The GIMET-QR tools can be found on www.commoncoreworks.org under *Quick Links*, including the companion document that explains the various uses of the tool.

Additionally, the Council will develop an Android and an Apple APP that will enable teams to utilize GIMET-QR more efficiently and effectively. Examples of evidence of GIMET indicators that reviewers find in materials under review can be uploaded into the APP for easier sharing and discussion with team members.

➤ ***Common Core Website***

The Council launched www.commoncoreworks.org, a website where districts and organizations can share high quality materials. This website includes the following materials developed by the Council.

- A set of grade-level rubrics and a companion document that define the key features for reviewers to consider in examining the quality of instructional materials in English Language Arts K-12. This tool is known as the Grade-Level Instructional Materials Evaluation Tool–Quality Review (GIMET-QR).

<http://www.cgcs.org/Page/474>

- A set of grade-level rubrics and a companion document that define the key features for reviewers to consider in examining the quality of instructional materials in mathematics K-8. The key features include examples and guiding statements from the *Illustrative Mathematics* progression documents to clarify the criteria. This tool is known as the Grade-Level Instructional Materials Evaluation Tool–Quality Review (GIMET-QR).

<http://www.cgcs.org/Page/475>

- 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>

- Two three-minute videos for 2015 (one in English and one in Spanish) to explain how the Common Core State Standards will help students achieve at high levels and help them learn what they need to know to get to graduation and beyond.

<http://www.cgcs.org/Page/467>

- Two 30-second Public Service Announcements (one in English and one in Spanish) to increase public awareness regarding Common Core for English Language Arts. Also, two 30-second Public Service Announcements (one in English and one in Spanish) to increase public awareness regarding Common Core for Mathematics.

<http://www.cgcs.org/Page/468>

- 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. We have also provided our members with links to important information including the mathematics progressions that provide greater detail and clarity about college- and career-readiness standards for mathematics.

➤ ***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 worked directly with the writers to ensure a shared understanding of the intent of the standards and the instructional and curricular shifts that they require. Now, we focus 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

- The Council conducts two-day writing conferences including a component to address writing in mathematics. The literacy component focuses on student's use of knowledge gained from a series of texts on a specific topic in order to produce effective argumentative compositions. These practical approaches for teaching argumentative writing have been presented at previous writing retreats and continues to expand across content areas. Districts that are interested in hosting such conferences can contact the Council's Director of Language Arts and Literacy, Robin Hall (rhall@cgcs.org).
- The Council and Student Achievement Partners continue to co-sponsor the Text-Set Project. The project focuses on how to use multiple reading selections on a theme or subject to deepen student understanding of the world, while systematically building their vocabulary and knowledge of language structure.

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 continue to 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 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. These sets are currently available on Edmodo. Text-Set conferences have been held in many member districts and additional such learning opportunities can be requested through the Council.

Additional Free Online Resources

- The Council together with Student Achievement Partners has launched several projects to assist districts in locating useful materials and updating current materials to meet the instructional shifts required by Common Core and College and Career Readiness Standards.
 - For grades K-2, the Read-Aloud Project (RAP); 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. Vetted RAP resources are currently posted on Edmodo. There are more than 150 RAP lessons that have been vetted and posted on Edmodo. The RAP group has grown to over 4900 members.
 - For grades 3-5, the Basal Alignment Project; the Basal Alignment Project Group has grown to over 40,500 members with over 350 revisions to the

questions currently published for textbook readings posted on Edmodo. Additional units are being added within RAP, BAP, and AAP project groups as they are vetted.

- For grades 6-10, The Anthology Alignment Project group has over 9,600 members with approximately 200 AAP revisions posted.

Mathematics and Science

- The Council partnered with a University of Chicago team at the Center for Elementary Mathematics and Science Education to provide feedback on a toolbox for K-12 teachers, administrators and district leaders. This toolbox, located at <http://leadcs.org/>, will help urban districts make decisions about improving computer science education at scale. The Council in collaboration with the team from the University of Chicago will conduct a webinar for member districts to provide a focused look at the materials available on the site. Additionally, members will be notified about an upcoming conference in October of 2016 that has been funded by the National Science Foundation to encourage computer science education in member districts. The targeted audience for the pre-conference is chief academic officers, and district mathematics and computer science curriculum leaders. Information about subsidizing travel expenses will be
- Under the leadership of the Bilingual team, the academic department is supporting the development of a new tool for materials selection, under the working title, *Spurring Improvement of (Mathematics) Instructional Materials for ELLs and Students with Special Needs*. The tool is to be used by publishers of mathematics materials to create the type of instructional content that will enable our districts to successfully address the needs of ELLs and students with disabilities while implementing college and career-readiness standards in mathematics.

➤ *Curriculum and Research Directors' Conference*

The Curriculum and Research Directors' Conference took place in Chicago, July 14-18, 2015. Participants engaged in sessions focused how to communicate across silos to improve alignment and coherence while leveraging resources toward building a shared vision. The Council extended invitations to lead principal supervisors in order to jointly discuss developing and maintaining productive communications across teaching and learning and school divisions leading to improved student achievement.

This year, the conference will be held July 11-14, 2016, in Palm Beach, Florida. Lead principal supervisors are now an integral part of the Curriculum and Research Directors' conference, which will also feature a joint meeting with chief information officers. Districts are encouraged to send their teams to share in discussions and information around the theme: *Making Strides Together to Improve Student Achievement in an Era of Change*.

**WORKING GROUPS PROJECT: STANDARDS
IMPLEMENTATION INDICATORS FOR DISTRICTS**

Indicators of Success:

A Guide for Assessing District-Level Implementation of College and Career- Readiness Standards

Council of the Great City Schools, Spring 2016

DRAFT—NOT FOR DISTRIBUTION

Table of Contents

Section 1: Vision and Goal Setting.....	3
Section 2: Resource Allocation.....	9
Section 3: Parent and Community Outreach.....	14
Section 4: Curriculum and Instruction.....	18
Section 5: Professional Development.....	25
Section 6: Assessment.....	28
Section 7: Student Data.....	33

I. Vision and Goal-Setting

1. Has the district defined a vision for high quality school and classroom practice that reflects college- and career-readiness standards and high expectations for students?		
Off Track	On Track	Evidence
There is no common, unifying vision for instruction throughout the district, leaving schools to adopt practices and approaches that vary in quality and do not always reflect the instructional shifts and higher expectations of college- and career-readiness standards.	The district has defined and sustained a unifying vision for instructional practice aligned to college- and career-readiness standards that sets high expectations for all students.	School board policy and written documentation of the district’s instructional vision, such as a vision statement or strategic plan; focus groups of central office, school-level staff, parents, and other key stakeholders

2. Does the district expect that <i>all</i> students will meet college- and career-readiness standards?		
Off Track	On Track	Evidence
The needs of ELLs, struggling students, students facing discrimination, and students with disabilities are not explicitly factored into the plan for rolling out college- and career-readiness standards. English language learner, special education, and other specialized staff devoted to unique student groups work in silos both at the central office level and within schools, and are rarely consulted or involved in planning or professional development opportunities around college- and career-readiness standards.	The district believes that all students can succeed and should have access to high quality instruction and college- and career-readiness standards at each grade level. District leadership has involved ELL, special education, and other specialized staff devoted to unique student groups in planning and implementing the new standards to ensure that the appropriate support, training, and scaffolds are available and that all students have full access to college- and career-readiness standards.	Focus groups with ELL staff and teachers; a standards implementation plan that includes explicit steps to ensure that ELLs, students with disabilities, students facing discrimination, and struggling students have full access to college- and career-readiness standards

I. Vision and Goal-Setting

Communication and Outreach

3. Has the district clearly communicated throughout the organization its vision for instruction aligned to college- and career-readiness standards?

Off Track	On Track	Evidence
<p>District leadership may have a vision for how they want to support and advance college- and career-readiness systemwide for all students, but the district’s instructional expectations and vision are not widely understood or shared by various central office instructional units, school administrators, principals, or teachers.</p>	<p>The district has clearly and consistently communicated its vision for instructional quality throughout the organization. Staff throughout the district, from the central office to school leaders and teachers, hold a clear, shared understanding of the district’s instructional standards and expectations for all students.</p>	<p>A standards implementation plan that includes explicit steps to inform and engage staff throughout the organization; materials and targeted outreach for different audiences; focus groups and surveys of central office and school staff</p>

I. Vision and Goal-Setting

Execution of Beliefs

4. Does the district have an implementation plan for establishing and sustaining college- and career-readiness standards as a shared district priority and managing systemwide change?		
Off Track	On Track	Evidence
The district has announced the adoption of college- and career-readiness standards, but it has not made it clear why the standards are important, what they will achieve, or how they will be implemented throughout the district.	The superintendent and school board serve as public champions of college- and career-readiness standards, making it clear that the district has adopted these standards in order to improve educational outcomes for students. A clear, detailed implementation plan has been shared widely throughout the organization that lays out implementation benchmarks, identifies the roles of multiple levels of staff, allocates the resources necessary to build internal capacity, and holds leadership and all departments accountable for meeting the district’s expectations for strong implementation.	A clear, specific standards implementation plan; cross-functional teams tasked with overseeing and supporting strong implementation of college- and career-readiness standards and instructional shifts

5. Has the district mapped out its core initiatives to ensure that all of the varying efforts and expectations of teachers and school leaders are consistent with the district’s overall vision and are helping to advance implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
Numerous, inconsistent, or redundant reform initiatives compete for the time and resources of central office staff, school leaders, and classroom teachers. Alignment to college- and career-readiness standards or instructional shifts is not taken into account when selecting and pursuing new reform initiatives or projects.	The district has a well-defined and commonly understood core set of initiatives that work in tandem to advance the district’s strategic priorities and vision for instructional quality and improvement, which is centered around strong implementation of college- and career-readiness standards.	A strategic plan that lays out all current initiatives and articulates their connection to overall district goals and implementation of college- and career-readiness standards; focus groups of central office staff, principals, teachers

I. Vision and Goal-Setting

Execution of Beliefs

6. Do school improvement plans reflect the district’s expectation that schools implement college- and career-readiness standards?		
Off Track	On Track	Evidence
School improvement plans are often developed in an ad hoc manner, and there is no expectation that these plans reflect the goals or strategic direction of the district as a whole, including implementation of college- and career-readiness standards.	The systematic process employed in the development, review, and approval of school improvement plans ensures that they are aligned to district strategic goals and incorporate indicators of successful implementation of college- and career-readiness standards in all classrooms and for all students.	A sample of school improvement plans; documentation of the district’s review process for developing and revising school improvement plans; interviews or focus groups with students, parents, teachers, principals and principal supervisors

7. Does the formal or informal principal evaluation process reflect the district’s expectation that principals provide instructional leadership and build site-based capacity for implementing college- and career-readiness standards?		
Off Track	On Track	Evidence
Principal evaluations do not incorporate indicators of a principal’s instructional leadership and commitment to providing teachers with the support, tools, and professional development necessary to provide all students with instruction aligned to college- and career-readiness standards at each grade level.	Principal evaluations hold principals responsible for developing their own knowledge of content and pedagogy in order to support and improve their teachers’ instructional practice, addressing weaknesses and capitalizing on teacher strengths.	Formal or informal principal evaluation forms/rubrics; school walk-throughs; student, parent, principal and principal supervisor focus groups or surveys

I. Vision and Goal-Setting

Execution of Beliefs

8. Does the formal or informal teacher evaluation process reflect the district’s expectation that teachers apply college-and career-readiness standards in their classroom instruction to meet the needs of all learners?

Off Track	On Track	Evidence
<p>Formal or informal teacher evaluations or observations do not incorporate any indicators of teacher knowledge of college- and career-readiness standards or skill in adapting their teaching practice to reflect the instructional shifts called for by the standards.</p>	<p>Teacher evaluations hold teachers accountable for cultivating a deep knowledge of grade-level content and integrating college- and career-readiness standards into their classroom instruction to meet the needs of all learners.</p>	<p>Formal and informal teacher evaluation forms/rubrics; school and classroom walkthroughs; student, parent, principal and teacher focus groups or surveys</p>

9. Do school and classroom walk-throughs gauge the level of college- and career-readiness standards implementation, and are the results used to improve instruction for *all* learners?

Off Track	On Track	Evidence
<p>School and classroom walk-throughs do not yield any data on the quality of implementation of college- or career-readiness standards, or results are not used in conjunction with other data to improve instructional practice.</p>	<p>The rubrics, guidance, and protocols provided to district and school staff for conducting school and classroom walk-throughs explicitly incorporate indicators related to the quality of standards implementation and the needs of all learners in the classroom. There is a process in place for then sharing the data and following up with teachers and school leadership to help strengthen instruction and implementation of the standards.</p>	<p>Walk-through rubrics and published protocols; training materials used to prepare staff for school or classroom walk-throughs; focus groups and interviews of students, parents, teachers, principals, principal supervisors, and central office curriculum staff</p>

I. Vision and Goal-Setting

Execution of Beliefs

10. Do data systems provide district leaders with indicators of students' college- and career-readiness and are they used to inform standards implementation efforts?		
Off Track	On Track	Evidence
No data system or reporting mechanism exists to regularly inform the school board or district leaders of growth in college- and career-readiness. Or, a data system exists, but does not reflect agreed upon measures of progress, is not readily accessible, or does not incorporate relevant indicators that would help gauge and inform standards implementation.	The district's data systems provide school board members and district staff with timely data on student progress toward college- and career-readiness. The data directly address pre-established, agreed-upon measures of student growth and are used to improve standards implementation.	District data systems; surveys and focus groups of school board members and district staff

Next Steps

II. Resource Allocation

11. Does the district have a broad strategy for human capital development to support implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
<p>The district has not identified its staffing needs—or the knowledge and skills that staff and teachers will require—to effectively implement college- and career-readiness standards. There is no human capital development plan in place to nurture leadership or to build school-based capacity to implement high academic standards. The district’s human resources or talent development office works in a silo, with very little coordination with other key district offices or alignment to key district priorities.</p>	<p>The district has a process for identifying its staffing needs by both position and required expertise at both the central office and school levels, and has defined and implemented a sustainable, long-term plan to recruit and develop the teachers, staff, and leaders necessary to effectively implement college- and career-readiness standards across the system. The human capital development strategy reflects the close coordination of the human resources/talent development office and other departments, as well as the district’s understanding of the need to explicitly address the human capital component of each district initiative or priority.</p>	<p>A standards implementation plan that includes explicit steps for developing and deploying staff; focus groups of central office staff from both the instructional and human resources divisions; focus groups of principals and school level staff</p>

12. Are district staff strategically deployed to help build school-level capacity to implement college- and career-readiness standards?		
Off Track	On Track	Evidence
<p>It is not clear that staff are strategically positioned either within central office divisions or among school sites to effectively build school-level capacity to implement college- and career-readiness standards. In the absence of clearly-defined roles and the close coordination of the curriculum department and the school management structure, the district has no mechanism to ensure consistency in standards implementation or to monitor and address implementation issues that arise at the school level.</p>	<p>The district has taken concrete steps to ensure that the “right people” are in the “right place” throughout the system to support standards implementation. This has included clearly defining the roles of both central office and site-based staff in building schoolwide instructional capacity. In addition, the district has developed a process to support strategic teacher and administrator assignment and retention practices. Principal supervisors, in particular, have been tapped to serve as a link between the central office and schools, communicating and disseminating the district’s instructional expectations and resources to ensure coherence and consistency in standards implementation across schools.</p>	<p>Job descriptions; teacher/administrator negotiated contract; RIF or reassignment policies; the district’s standards implementation plan; school level surveys and focus groups; staff evaluations linked to job descriptions</p>

II. Resource Allocation

Human Resources

13. Has the district established cross-functional teams, PLCs, and other organizational structures to promote inter-departmental coordination of standards implementation efforts at both the school and district levels?		
Off Track	On Track	Evidence
<p>The district has not established formal cross-functional teams, PLCs, or other structures to promote interdepartmental communication and coordination of efforts to implement college- and career-readiness standards. District staff in key divisions, such as the curriculum unit, ELL and special education units, and school administrative management units generally work in isolation from one another and have not built a strong, shared understanding of or shared responsibility for instructional standards and the resources schools need to implement them. Schools therefore receive mixed or inconsistent messages from the central office regarding how to implement college- and career-readiness standards in classrooms.</p>	<p>Cross-functional teaming has been used as an effective tool for promoting interdepartmental collaboration and shared accountability for instructional quality. These cross-functional teams consist of representatives from a range of areas, including curriculum, ELL and special education, school management, as well as school-based staff and leaders. The district also systematically employs PLCs and other structures to promote cross-functional coordination and strengthen standards implementation efforts at both the district and school levels.</p>	<p>Agendas or rubrics used for team visits to school sites; reports generated by cross-functional teams on the status of standards implementation; school and district calendars/master schedules, PLC agendas, interviews of members of cross-functional teams; school and district focus groups</p>

II. Resource Allocation

14. Has the district allocated the financial resources necessary to support systemwide implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
Financial resources are not strategically allocated throughout the system to support implementation of college- and career-readiness standards. Or, the district has no mechanism for determining whether or not financial resources are strategically deployed across the organization. The district may have funded a college- and career-readiness unit or officer position, but it hasn't taken steps to assess and reallocate the broader systemwide financial resources needed by this department—as well as other departments and schools—to effectively manage standards implementation.	The district has conducted a comprehensive assessment of the financial resources required throughout the system to implement college- and career-readiness standards, and has taken steps to ensure the strategic allocation of these resources to support both district- and school-level implementation work. This process has involved taking a hard look at all district investments and reallocating or eliminating funding for activities that were not aligned with current district needs and priorities.	Budget planning documents and agendas; documentation of of program elimination process; focus groups with central office staff from various departments/relevant committees; focus groups with principals and building leadership teams

15. Does the district have a viable plan for sustaining its support for implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
The district is currently funding its standards implementation efforts through an external grant or other outside source, and has no plan for how to sustain funding for implementation once the grant ends. Or, the district is using its own funds for implementation, but has no plan for how to sustain this work over the long term.	The district has a long-term budget plan for sustaining its commitment to college- and career-readiness standards. Standards implementation efforts may be currently supported by external sources of funding, but the district is using those funds strategically to build internal capacity, and has identified a strategy for securing or reallocating funds to continue this work after the grant funds run out.	District budget plan, projections

II. Resource Allocation

Time

16. Do district instructional leaders allocate sufficient time to coordinating and advancing implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
Meetings of the district’s instructional leadership team do not regularly incorporate discussions about standards implementation, or these discussions are typically covered at a very superficial level in limited time slots. In general, instructional leaders and staff across various departments do not have the opportunity to regularly check in with one another, to discuss shared lessons and challenges in implementation work, and to expand their knowledge and expertise in the standards.	Meeting agendas of the district’s instructional leadership team set aside substantial time for sharing data on the progress made and strategies employed in implementing college- and career-readiness standards. This data is then used to make course corrections and shape the district’s implementation strategy moving forward. In addition to these formal leadership meetings, instructional leaders and staff have ample opportunities to share milestones and challenges, to follow up with each other on the effectiveness of various approaches and activities, and to continuously build a greater shared understanding of the district’s instructional expectations.	Instructional leadership team agendas, interviews with district instructional leaders and staff across departments

17. Do schools allocate sufficient time to coordinating and advancing implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
Demanding school schedules do not set aside the time necessary for teachers and staff to work together to plan for strong schoolwide implementation of college- and career-readiness standards. Common planning time and professional learning communities may exist, but this time is not consistently used for deepening knowledge and expertise in the standards, coordinating implementation efforts, or sharing progress data.	Schools’ master schedules reflect strategic decisions about how to allocate time for planning and implementing college- and career-readiness standards. Common planning time, professional learning communities (PLCs), and other structures and supports provide teachers and staff with regular opportunities to deepen instructional knowledge and expertise in the standards, to share data on student work and progress, and to collaboratively identify and resolve challenges in implementation.	School calendars and master schedules; agendas from PLCs; teacher, principal, and site-based support staff surveys/focus groups

II. Resource Allocation

Time

18. Has the district taken any steps to ensure the strategic reallocation of staff time to carry out new roles and responsibilities tied to standards implementation?		
Off Track	On Track	Evidence
Implementation of college- and career-readiness standards has saddled district- and school-level staff with significant additional roles and responsibilities. These new demands on their time and attention are seen as added responsibilities rather than a fundamental shift in the work they do, and are not accompanied by any preparation, support, or guidance on how to balance or delegate former duties.	The district’s plan for implementing college- and career-readiness standards has required a broad shift in traditional roles and responsibilities. In order to ensure the strategic reallocation of staff time to effectively meet these new expectations, the district has provided staff with additional support, targeted preparation for new roles, and guidance on why and how traditional duties are to be redistributed.	Focus groups and interviews with school and district staff, past and present job descriptions

Next Steps

III. Parent and Community Outreach

19. Has the district developed an outreach plan for informing and engaging families, the community, and external stakeholders about college- and career readiness standards?		
Off Track	On Track	Evidence
<p>The district implements instructional programming and reform without informing or engaging students, their families, or the community. District stakeholders do not understand the rationale for adopting new college- and career-readiness standards, what the shifts in instructional expectations are, or how the district is approaching the implementation process. Information about college- and career-readiness standards and the curriculum may be posted on the district’s website, but the district has made no effort to ensure that the materials are widely disseminated and accessible to a range of different cultural and linguistic communities.</p>	<p>The district has a multi-layered outreach and communications plan that effectively informs students, families, and the community about changes in the district’s instructional programming as a result of college- and career-readiness standards. This outreach strategy involves open forums and community meetings; online, print, and multi-media materials targeted for a variety of audiences, including non-English speaking families; and training for school-based staff in how to effectively communicate with parents about the standards and their children’s academic progress. The district monitors the effectiveness of this outreach strategy by gauging community awareness, understanding, and support for college- and career-readiness standards.</p>	<p>Parent surveys; focus groups of teachers, parents, stakeholders; parent-friendly outreach materials that convey information about college- and career-readiness standards and how to interpret student academic assessment results; agendas from community forums such as parent meetings or televised forums for sharing information and progress updates on the implementation process; district and board policy statements or resolutions; minutes from board meetings of parent testimony regarding instructional standards and expectations</p>

III. Parent and Community Outreach

20. Has the district established a formal process for gathering parent and community feedback and addressing any questions or issues that arise in the implementation of college- and career-readiness standards?

Off Track	On Track	Evidence
<p>Parents and stakeholders do not know who to contact or what process to follow to provide feedback on the implementation of college- and career-readiness standards. School staff may not be equipped to address parent questions or concerns about the new instructional expectations or their children’s progress, and the district has no way of capturing this information in order to make constructive changes to its implementation strategy based on parent or community input.</p>	<p>The district actively seeks out feedback from external stakeholders and has clearly defined a process by which parents and others can obtain information, submit questions, and provide input to schools and the district concerning implementation of college- and career-readiness standards. Parents and members of the community have designated points of contact both within schools and at the district central office, and these staff have the knowledge and expertise to answer questions about the standards implementation process and what the new instructional expectations mean for students. The district regularly monitors and analyzes this feedback in order to revise and update their standards implementation strategy, as well as their parent and community outreach strategies.</p>	<p>Parent surveys; focus groups of teachers, parents, and key stakeholders; outreach materials that provide information and instructions for contacting school and district representatives</p>

III. Parent and Community Outreach

21. Does the district provide parents with resources that clarify new instructional expectations and the meaning of assessment results tied to college- and career-readiness standards? Do these resources identify the steps parents can take to support their child’s academic growth?

Off Track	On Track	Evidence
<p>Parents do not have access to any user-friendly district resources or tools to help them understand what students will be learning throughout the year and what their child’s assessment results mean about their academic progress. If such resources do exist, they are hard to locate and comprehend, and have not been translated into other languages for non-English speaking families. Parents therefore do not understand how instructional expectations tied to college- and career-readiness standards differ from how and what students learned in the past, and how the concepts and knowledge built at each grade level are intended to connect across subject areas and grades. This lack of understanding undermines parents’ ability to support their child’s academic growth at home.</p>	<p>The district employs clear, user-friendly parent resources—ranging from written parent guides such as the CGCS Parent Roadmaps to forums such as parent universities or workshops—that lay out what students will be learning throughout the school year and how instructional strategies and expectations are different from what parents may have encountered in the past. These resources are readily accessible and translated into other languages in order to reach non-English speaking families. Parents receive regular updates on their child’s academic progress, and when assessment results are released parents are provided with guidance on what these results mean about their child’s academic growth. The district also provides resources and guidance, such as a homework hotline, to parents about what they can do to support student learning at home.</p>	<p>Parent and key stakeholder focus groups and surveys, outreach materials and communications to parents, including communications in languages other than English; samples of student work or lessons shared with parents to build their understanding of standards and instructional changes; on-line, print, or face-to-face instruction geared to parents on specific aspects of college- and career-readiness standards; guidance for supporting student learning at home</p>

III. Parent and Community Outreach

22. Does the district provide support and training to staff on communicating with parents and the community about the implementation of college- and career-readiness standards?		
Off Track	On Track	Evidence
<p>The district does not provide school or central office staff with any guidance on how to communicate with parents and the public about the transition to college- and career-readiness standards. School and district staff have varying levels of knowledge and expertise in the standards, so parents and community members receive uneven and inconsistent messages about what the new standards entail and the implications for schools and students. This lack of clear and consistent messaging undermines the district’s efforts to build parent and community support for college- and career-readiness reforms.</p>	<p>The district has identified and widely shared a core set of messages about the systemwide transition to college- and career-readiness standards, as well as more detailed information tailored to meet the needs of various audiences. Both school and central office staff are prepared to communicate these messages consistently and effectively. In particular, the district has ensured that teachers are well trained on the standards as parents and the public turn to them first for answers. This transparency and consistency in the information being shared with the public has helped build broadbased understanding and support for the district’s college- and career-readiness initiatives.</p>	<p>Standards implementation plan; documentation of primary and secondary messages about standards implementation; evidence of outreach and training for both central office and school-based staff on the standards</p>

Next Steps

IV. Curriculum and Instruction

Alignment
and Quality

23. Are the district’s curriculum documents clear about what must be taught and at what depth to reflect college- and career-readiness standards at each grade level?

Off Track	On Track	Evidence
<p>The curriculum does not guide teachers in teaching to grade-level standards and setting clear expectations that all students will attain those standards. Teaching the curriculum is considered optional and is implemented with great variability across the district.</p>	<p>The curriculum clarifies for teachers the grade-level and course-specific expectations for all student groups. District policies and procedures specifically require teaching the curriculum, and resources are devoted to ensuring broad understanding of why it is important to implement the curriculum with fidelity.</p>	<p>Exemplars, anchor units, or other evidence from curriculum documents and guidance materials; focus groups of teachers; analysis of curriculum guidance using tools such as the Grade-Level Instructional Materials Tool—Quality Review (GIMET-QR); a review of district instructional policy and procedures; school and classroom walk-throughs</p>

24. Does the curriculum build instructional coherence within and across grade levels that is consistent with college- and career-readiness standards?

Off Track	On Track	Evidence
<p>Curriculum materials and pacing guides present the standards in isolation and do not sufficiently show how they connect with one another and how the standards, concepts, and skills build on one another throughout the school year and from one year to the next.</p>	<p>Curriculum materials provide explicit guidance on how to connect multiple concepts and build upon prior learning within and across grades. Exemplars of lessons and units of study show the progression of learning from grade to grade, and curriculum and pacing guidance demonstrates for teachers how to incorporate content and increase rigor in their instruction throughout the school year.</p>	<p>Curriculum documents and guidance; pacing guides; teacher focus groups; school and classroom walk-throughs</p>

IV. Curriculum and Instruction

25. Has the district articulated how college- and career-readiness standards should be applied across subject areas?

Off Track	On Track	Evidence
<p>Teachers and administrators are not provided with sufficient guidance to help them identify specific connections between content-area standards or apply college- and career-readiness standards in courses other than English language arts and mathematics to build coherence in instructional standards across the curriculum.</p>	<p>All content area teachers are provided written guidance or other support to help them connect their course content to key mathematics, reading, writing, listening and speaking standards. Similarly, informational texts and excerpts read in English language arts classes are approached as an opportunity to deepen content understanding and the use of academic language in history, science, mathematics, social studies, and other content areas.</p>	<p>Guidance in curriculum documents or digital materials that articulate links between subjects or shared instructional standards; tools/text sets for teachers to easily identify grade-level texts across the curriculum</p>

26. Does the curriculum explicitly articulate standards-aligned expectations for all learners, by grade-level, for student work at different points during the school year?

Off Track	On Track	Evidence
<p>There are no rubrics, guidance materials, or tools such as annotated student work to build a shared understanding of grade-level expectations.</p>	<p>Curriculum materials provide explicit guidance in how district expectations should be reflected in student work. Exemplars of work by quarter or semester show how student mastery and the complexity of student tasks are expected to develop over the school year for the grade level or course. Exemplars of work also illustrate different levels of English proficiency, as well as work completed with necessary accommodations for students with disabilities. Curriculum and pacing guides show how to convey the content and rigor of the standards so that learning is developed at ever more complex levels throughout the school year.</p>	<p>Student work samples from across the district that reflect the rigor of assignments by grade level or course; results from benchmark assessments; IEP-specified assessments</p>

IV. Curriculum and Instruction

Delivery and Usage

27. Does the curriculum contain scaffolds or other supports that address gaps in student knowledge and the needs of ELLs and students with disabilities to ensure broad-based student attainment of grade-level standards?		
Off Track	On Track	Evidence
Curriculum resources related ELLs and students with disabilities do not reflect the expectation of grade-level rigor and strategic scaffolding; rather, they lean heavily upon watered-down content and an overly-simplified set of discrete strategies.	Instructional design and the curriculum resources related to ELLs and students with disabilities consistently demonstrate grade-level rigor, employing academic conversations, reasoning skills, and engagement with complex text. Instruction is reinforced with scaffolds that acknowledge students’ assets as well as their specific needs.	Specific scaffolds or resources provided in curriculum documents; classroom walk-throughs; focus groups or surveys of school-based instructional staff and coaches

28. Has the district identified instructional tools, methods, or models to enhance the delivery of college- and career-readiness standards?		
Off Track	On Track	Evidence
Few models—if any—are provided to clarify district expectations for instructional delivery of college- and career-readiness standards. The models that are provided lack the quality to illustrate the instructional shifts and depth of content knowledge development that the standards require.	The district has clearly defined instructional methods, models, and tools that can be used to implement college- and career-readiness standards in all classrooms. The district has ensured widespread dissemination of these models and provided professional development, guidance, and support to ensure the effective application of these methods in the classroom.	Anchor units with assessment tasks; curriculum documents; teacher surveys and focus groups; school and classroom walk-throughs

IV. Curriculum and Instruction

Instructional Programs
and Materials

29. Does the district track what instructional materials are being used in schools to implement college- and career-readiness standards?

Off Track	On Track	Evidence
<p>The district does not track the use or effectiveness of instructional programming or materials to implement college- and career-readiness standards in schools.</p>	<p>The district systematically tracks which resources are in use at each school site, and the degree of success schools have had with those materials among various student groups.</p>	<p>A database of the instructional materials used across the district; rubrics for determining the success of schools’ use of materials; program evaluation design/reports</p>

30. Is the district using its technological capacity to provide teachers ready access to high quality digital tools to advance implementation of the standards?

Off Track	On Track	Evidence
<p>The district does not vet digital tools designed to advance the implementation of the standards. Schools and teachers are left to independently pursue such tools and training, leading to variations in access to resources and interpretation of the standards across the district.</p>	<p>The district has a cross-functional team with expertise in the standards that is charged with vetting digital tools to advance implementation of the standards. Tools in use are annotated to indicate their strengths and areas of weakness. The district has a mechanism for informing principal supervisors, principals, coaches, and teachers of what these vetted tools offer and whether their use is mandatory or voluntary.</p>	<p>Annotated list of digital tools; tracking of access and usage data; surveys of users regarding their perceptions of the usefulness of the tools</p>

IV. Curriculum and Instruction

Instructional Programs
and Materials

31. Are ELA and math instructional materials high quality and aligned to college- and career-readiness standards, and do they address the needs of special populations?

Off Track	On Track	Evidence
<p>The district has not analyzed adopted materials to assess their level of quality and alignment to college- and career-readiness standards. The district also does not assess whether or not instructional materials sufficiently address students with specialized learning needs, such as ELLs or students with disabilities.</p>	<p>The district makes use of tools such as the Grade-level Instructional Materials Evaluation Tool–Quality Review (GIMET-QR), English Language Development (ELD) 2.0, Instructional Materials Evaluation Tool (IMET), and the EQuIP rubric to ensure that instructional materials used in schools are high quality, aligned to grade-level college- and career-readiness standards, and meet the needs of all learners. The results of the district’s review of materials are used to make adjustments and/or acquire additional materials to address any gaps or areas of weakness that have been discovered.</p>	<p>Completed rubrics or other written analysis of instructional materials; focus groups and surveys of district and school staff</p>

32. Is the district providing guidance and training to teachers and administrators in the selection or development of instructional materials aligned to college- and career-readiness standards?

Off Track	On Track	Evidence
<p>School staff are left on their own to select or design instructional materials, leaving each school to invent their own solutions without any mechanism to share results or achieve efficiencies.</p>	<p>The district provides teachers and administrators with explicit guidance in the selection or development of instructional materials, including tools for gauging alignment with district standards, examples of aligned or misaligned materials, and the characteristics of materials likely to accelerate attainment of the standards by ELLs and students with disabilities. The district ensures that teachers and administrators know by grade level and content area which standards are most likely to need additional support beyond the adopted materials.</p>	<p>Guidance materials; samples of selected or developed materials analyzed for alignment and effectiveness; focus groups and surveys of teachers and principals</p>

IV. Curriculum and Instruction

Instructional Programs
and Materials

33. Are supplemental materials, programs, and interventions, including materials that address the needs of special populations, high quality and aligned to college- and career-readiness standards?

Off Track	On Track	Evidence
<p>The district does not vet the supplemental materials and interventions used in schools to ensure their quality or alignment to district instructional standards. The district also does not assess whether or not supplemental materials or programming sufficiently addresses students with specialized learning needs, such as ELLs or students with disabilities.</p>	<p>The district has a schedule of evaluation projects to assess supplemental materials and interventions for their alignment with district standards and general curriculum materials, as well as their effectiveness in addressing specific student needs and advancing academic attainment. Interventions and materials for special populations, in particular, are assessed on the basis of whether they equip students with the knowledge and skills necessary to access grade-level content.</p>	<p>Match of supplemental materials to gaps in adopted materials or areas of low performance; completed screening rubrics; evaluation studies; guidance for how supplemental materials should complement or enhance general education materials</p>

34. Does the district provide guidance and support to schools and teachers in the selection and use of supplemental materials, programs, and interventions for students who are struggling to meet college and career readiness standards?

Off Track	On Track	Evidence
<p>Schools and teachers are left to select supplemental materials, programs, and interventions on their own without sufficient support or guidance. For example, there is no guidance in how to diagnose the root causes of a student's learning challenges and to then select the intervention that will best meet their specific needs.</p>	<p>The district provides teachers with guidance and training in identifying the root causes of students' learning challenges and tailoring interventions and materials to meet these specific needs. This support is developed and delivered through the collaboration of general, ELL, and special education staff.</p>	<p>Published guidance or professional development in selecting supplemental materials; surveys or focus groups of school-based instructional staff</p>

IV. Curriculum and Instruction

Communication and Outreach

35. Is the district regularly reaching out across departments and to teachers and administrators to gauge the quality and alignment of the curriculum to college- and career-readiness standards?		
Off Track	On Track	Evidence
The district has no process for collecting feedback from district staff, teachers, or administrators to assess whether the curriculum is clear, coherent, and aligned to the district's college- and career-readiness standards at each grade level.	The district employs a robust outreach strategy for soliciting feedback about the curriculum from key instructional staff within the central office, including ELL and special education leaders, as well as principal supervisors, school administrators, coaches, and teachers in order to ensure close alignment with grade-level college- and career-readiness standards and to address any issues regarding implementation. To facilitate the process of collecting this feedback, the district provides school-based staff with written guidance on factors to consider in gauging the utility and quality of the curriculum and for identifying where adjustments or additional support is needed.	Teacher/administrator surveys; focus groups of school and district staff

36. Does the district use data and feedback to revise the curriculum and build greater alignment to college- and career-readiness standards?		
Off Track	On Track	Evidence
There is no formal process for making or tracking changes in the curriculum. Changes are made centrally, and there is no specific evidence that performance data or feedback from staff across departments or in schools help shape the revision process or lead to greater alignment with college- and career-readiness standards.	The district systematically uses feedback and assessment results as an opportunity to refine and improve the curriculum, ensuring close alignment with grade-level college and career-readiness standards. The district clearly communicates all changes to the curriculum to teachers, administrators, and staff.	Teacher/administrator surveys; classroom observations and walk-throughs; school visits; copies of staff surveys or notes from focus groups used in the curriculum revision process

V. Professional Development

Quality, Alignment, and Implementation

37. Does the district have a professional development plan in place to ensure that central office and school-based leaders and staff develop the content knowledge and instructional skills necessary to implement the district’s college- and career-readiness standards?

Off Track	On Track	Evidence
<p>There is no coherent, sustained professional development plan in place to build districtwide capacity for implementing the district’s college- and career readiness standards. Professional development is mainly voluntary and amounts to a series of disconnected offerings that do not place a strong enough emphasis on developing content knowledge and mastering the instructional shifts called for by the standards. While Professional Learning Communities (PLCs) or other shared professional development opportunities are available, they are frequently used as extra planning time rather than opportunities to collaboratively build knowledge of content standards and instructional skills.</p>	<p>A comprehensive professional development plan is in place to systematically build central office and school-level capacity for implementing college- and career-readiness standards. In recognition of the complexity of the standards and the need for deep content knowledge and expertise in order to teach to these standards, professional development is rigorous, focused on enhancing content expertise, and sustained throughout the school year. School-based coaches and administrators then follow up directly with teachers to build on the training they receive, illustrating how new knowledge and skills can be integrated into instructional practice. Professional Learning Communities and other opportunities for collaboration are systematically used to build a shared understanding of standards-based content and instruction, to gauge the level of student work, and to determine next steps for improving student performance.</p>	<p>District professional development plan and calendar; principal and teacher surveys; classroom walk-through observations with indicators for gauging the application of professional development</p>

V. Professional Development

Quality, Alignment, and Implementation

38. Is professional development differentiated to meet the needs of all central office and school-based staff in implementing college- and career-readiness standards?		
Off Track	On Track	Evidence
Professional development sessions are planned and delivered in the same way for all staff, not taking into account the various needs and roles played by central office staff, principal supervisors, principals, teachers and coaches in the implementation of college- and career-readiness standards.	The district provides professional development in standards implementation that is tailored to meet the unique needs of central office or school-based staff based on experience, performance, grade level, subject area, and specialized role within the district or at a school. For example, teachers have professional learning opportunities focused on developing deep knowledge of subject area content and instruction, while principals and central office staff learn how to identify standards-aligned instruction in classrooms and how to differentiate instructional support for teachers.	Professional development plan and calendar; school and central office staff surveys and focus groups

39. Does the district's professional development provide all teachers with the skills necessary to meet the needs of special groups such as English language learners and students with disabilities, ensuring that all students have access to high instructional standards and expectations?		
Off Track	On Track	Evidence
Professional development is designed and offered without the input or involvement of key instructional divisions, including the ELL and special education departments. Professional development offerings are therefore not optimized to meet the specialized learning needs of ELLs, students with disabilities, struggling students, and other student groups as they work to attain grade-level college- and career-readiness standards.	Professional development is designed to equip <i>all</i> teachers with the instructional skills, strategies, and resources necessary to ensure that ELLs, students with disabilities, and other students with specialized learning needs gain the academic knowledge and literacy they need to access grade-level college- and career-readiness standards and content. There is a strong emphasis on setting common high expectations and building a sense of shared responsibility for all students.	Surveys or focus groups of ELL and special education staff within the central office; surveys and focus groups of principals and teachers, including ELL and special education teachers

V. Professional Development

Quality, Alignment, and Implementation

40. Does the district ensure that both internally- and externally-provided professional development is consistent with the district’s instructional vision and aligned to college- and career-readiness standards?		
Off Track	On Track	Evidence
The district invests substantial funds with the same external and internal professional development providers every year without evaluating their alignment with the district’s instructional vision or the consistency of the information they convey about college- and career-readiness standards. Professional development offerings may therefore vary in content and rigor.	The district’s professional development plan mandates strategic investments in high quality professional development that is consistent across the board and aligned with the vision and instructional priorities of the district—namely, the implementation of college- and career-readiness standards. In addition, the district works directly with external providers to ensure that their professional development activities build up the capacity of district and school-based staff to eventually provide the same services and support.	The district’s professional development plan; contracts with external providers; a sample of school professional development plans; classroom observations; instructional staff surveys; student achievement data in targeted areas; sample student work

41. Does the district evaluate the effectiveness of professional development in improving instructional practice and increasing student college- and career-readiness levels?		
Off Track	On Track	Evidence
The district does not have a structured process for evaluating the effectiveness of professional development in improving instructional practice or increasing student college- and career-readiness levels. The district does not go beyond taking attendance and asking for personal opinions about professional development offerings.	The district regularly evaluates the effectiveness of professional development, assessing whether teacher practice reflects the content and instructional shifts of the college-and-career readiness standards and whether these changes positively impact student performance.	School and classroom walk-throughs; student achievement patterns; student work products reflective of grade-level college- and career-readiness standards; teacher and principal focus groups

VI. Assessment

Alignment &
Administration

42. Are district summative, formative, and criterion-based assessments aligned to the content and rigor of college- and career-readiness standards?

Off Track	On Track	Evidence
<p>The district has not internally reviewed the extent to which all current and proposed assessments are aligned to the content and rigor of college- and career-ready standards. Or, the district has conducted a superficial or topical review and continues to administer or adopt assessments without knowing the precise degree of alignment.</p>	<p>The district has carefully developed and/or reviewed district instructional assessments to ensure their content is aligned to district standards, including the scope and sequence of instruction, and that items are of appropriate rigor to assess students' college- and career-readiness. Where possible, assessments have also been reviewed to ensure vertical alignment across grades levels. The district has discontinued the use of assessments that do not sufficiently reflect the content and rigor of district college- and career-readiness standards.</p>	<p>Test blueprints; curriculum implementation plan; research and/or assessment evaluation reports; curriculum audit results; teacher focus groups/interviews</p>

43. Does the district employ a broadly inclusive team of school- and district-based staff to develop or select assessments aligned to college- and career-readiness standards?

Off Track	On Track	Evidence
<p>Assessments are developed or selected by a small, non-diverse group of central office administrators, without the benefit of critical points of view and the expertise of various school and district staff. This lack of diversity and planning may result in assessments being selected and imposed on schools in a manner that creates pushback and undermines the successful and effective implementation of college- and career-readiness assessments.</p>	<p>The district has established a process for developing or selecting assessments that incorporates a range of school-based and central office staff, including teachers, principals, and representatives from the curriculum, ELL, special education, instructional technology, assessment, and research divisions. Designated representatives have received appropriate training on content and assessment item development. This inclusive process has led to broad-based understanding and support for assessments aligned to college- and career-readiness standards.</p>	<p>teacher and administrator focus groups; district assessment development and selection criteria</p>

VI. Assessment

Alignment & Administration

44. Are current or proposed standards-aligned assessments appropriate for and accessible to special populations and unique student groups?

Off Track	On Track	Evidence
<p>The district has selected assessments appropriate for only the general education population with little or no consideration of the suitability of accommodations, cultural bias of assessment items, or validity of results when using the assessments with ELLs, students with disabilities, students facing discrimination, and struggling students.</p>	<p>Assessments administered for the purpose of measuring college- and career-readiness have been reviewed for validity, cultural bias, and appropriateness with special populations. Assessments include all necessary accommodations, and the district has selected alternative assessments aligned to the standards appropriate for special populations.</p>	<p>review of the district’s portfolio of assessments; focus groups with ELL, special education, and other staff and teachers; curriculum implementation plan</p>

45. Has the district developed clear and consistent policies and procedures for administering college- and career-readiness assessments?

Off Track	On Track	Evidence
<p>The district has not developed or communicated clear and consistent guidance and policies on assessment administration, logistics, and security.</p>	<p>The district has created specialized assessment implementation and logistics teams to ensure that curriculum staff, school-based administrators, teachers, and staff from the instructional technology, facilities, finance, research, assessment and accountability divisions share the same understanding of test security and implementation plans. The district has policies and procedures in place to ensure minimum technology requirements are met in all schools and classrooms throughout the school year and during testing. Assessment administration is adequately staffed and student testing schedules are created to maximize student success.</p>	<p>written assessment policies and procedures; test security plan; staff focus groups/interviews; student focus groups</p>

VI. Assessment

Alignment & Administration

46. Are assessments designed or selected to provide timely and actionable feedback to teachers and district leaders about student progress toward attaining college- and career-readiness standards?

Off Track	On Track	Evidence
<p>Assessments are narrow in scope and purpose, yielding limited, incomplete, or untimely data on student knowledge, skills, and growth throughout the school year. Teachers, administrators, and district staff therefore lack the information they need to adjust programming, improve instruction, and target interventions in a timely manner. Meanwhile, students may be subject to frequent testing with little value in terms of improving their academic performance or instructional support.</p>	<p>The district designs or selects college- and career-readiness assessments that provide comprehensive, in-depth information about individual students' knowledge, skills, and growth throughout the school year. This data is disseminated in a timely manner in order to inform instruction and interventions.</p>	<p>student assessment reports; student, teacher and administrator focus groups; review of the district's portfolio of assessments</p>

47. Has the district clearly articulated testing guidelines and protocols to ensure the uniform and secure administration of college- and career-readiness assessments across schools?

Off Track	On Track	Evidence
<p>In the absence of clear testing guidance and central office monitoring, assessments are administered unevenly across buildings and classrooms, and schools experience testing inconsistencies or security issues.</p>	<p>The district's testing guidelines and security protocols are clearly articulated and communicated with schools. Assessments are administered in a uniform and secure manner across classrooms and buildings.</p>	<p>testing irregularity reports; district testing guidance documents; teacher focus groups and interviews; classroom walk-throughs</p>

VI. Assessment

48. Has the district taken steps to ensure that teachers and students have experience with the technology, tools, and methods they will use when taking college- and career-readiness assessments?

Off Track	On Track	Evidence
<p>The district does not review and track the testing methodology that will be employed from school to school, so they are unable to adequately inform and prepare school administrators and teachers. Students taking college- and career-readiness assessments may therefore encounter tools and technologies for the first time on test day, or with only a brief or superficial introduction to the devices and methods they will need to be successful.</p>	<p>The district has provided students and their teachers with opportunities to learn and practice using the tools and technologies they will encounter when they take college- and career-readiness assessments.</p>	<p>Assessment implementation plans; school and classroom walkthroughs; student and teacher focus groups</p>

VI. Assessment

49. Does the district’s professional development plan include training for teachers, administrators, and staff on how to access and analyze results from college- and career-readiness assessments?

Off Track	On Track	Evidence
<p>Assessment results are made available through written reports or online with little or no guidance on how to access or analyze the data to identify student academic strengths and challenges.</p>	<p>The district provides timely, user-friendly, and easy-to-interpret reports on all assessment results. Teachers and administrators have been provided guidance on how to customize and interpret the data to identify the academic needs and strengths of all students, including English learners and students with disabilities.</p>	<p>Assessment reports; district professional development plan; guidance documents on data use; teacher and administrator focus groups/interviews</p>

50. Has the district provided guidance to ensure that teachers are appropriately using assessment results to inform classroom instruction?

Off Track	On Track	Evidence
<p>The district has not articulated the appropriate instructional purposes of college- and career-readiness assessments. Rather than using assessment data to inform and improve instruction and interventions, teachers “teach to the test,” providing instruction based on released items from summative and formative assessments. Or teachers and schools may not be using assessment data at all.</p>	<p>The district has provided school staff and teachers with clear guidance and training in the use of assessment results to inform and improve classroom instruction and interventions.</p>	<p>guidance documents on data use; classroom walk-throughs; teacher and administrator focus groups/interviews; student work samples</p>

VII. Student Data

Access, Use, and
Dissemination

51. Does the district employ multiple measures for gauging students' college- and career-readiness and holding school and district staff accountable?

Off Track	On Track	Evidence
<p>The district does not employ multiple indicators to measure student progress toward college- and career-readiness, relying solely on results from summative state accountability assessments.</p>	<p>The district employs multiple student outcome measures to gauge college- and career-readiness and to inform district, school, and classroom accountability. These measures consist of both quantitative and qualitative data, such as assessment results, student engagement, attendance, student work samples, course-passing rates, student satisfaction, and graduation rates.</p>	<p>District assessment portfolio; evaluation results; district data dashboard</p>

52. Is data on college- and career- readiness standards implementation and on student attainment being coordinated and shared across central office departments?

Off Track	On Track	Evidence
<p>There are no formal structures or protocols for sharing data and coordinating data collection, analysis, and reporting across central office departments. Individual departments collect and maintain their own data. For example, ELL data is stored and accessible only within the ELL department; access to discipline data is limited to the dean of students.</p>	<p>Standards implementation and student outcome data are systematically collected, analyzed, and reported within and across central office departments and schools. The data are used to coordinate planning and support for the implementation of college- and career-ready standards.</p>	<p>Data management protocols; district staff surveys and interviews</p>

VII. Student Data

Access, Use, and
Dissemination

53. Has the district developed a formal process for publicly sharing data and program evaluation results on college- and career-ready standards initiatives with key internal and external stakeholders?

Off Track	On Track	Evidence
<p>Data is collected and program evaluations are completed, but are not publicized or made available to the public or key stakeholders within the district. Information that may portray the district in a negative light may not be released or published.</p>	<p>All program evaluations and appropriate data are made available on the district website and formally shared with key stakeholders inside and outside the district. Discussions about outcomes focus on continuous program improvement and strengthening implementation of college- and career-readiness standards.</p>	<p>District communications plan; data reporting such as school report cards or program evaluations</p>

ACADEMIC KEY PERFORMANCE INDICATORS

Academic Performance and Cost KPIs Council of the Great City Schools

General Education (Performance)¹

- Percent of students advancing from pre-k to k*
- Percent of third graders proficient in reading*
- Algebra I completion rate for credit by grade 9*
- Ninth grade course failure rate—one core course*
- Ninth graders with B average (GPA) or better*
- Absentee rate by grade level*
- Suspension rate*
- Instructional days missed per student due to suspensions*
- ELP acquisition rate for ELLs by initial ELP level, grade, and time in program
- Credit recovery success rate for high school summer school*
- Pass rate for high school summer school*
- Credit recovery success rate in virtual courses*
- Pass rate in virtual courses*
- Credit recovery success rates through reenrollment*
- AP participation rate*
- AP-equivalent participation rate*
- AP exam pass rate*
- Early college enrollment*
- Four-year graduation rate*
- Five-year graduation rate*

General Education (Costs)

- Early childhood education costs per pupil
- Class size reduction costs per pupil (grades 1-3)
- New teacher induction program costs per participant

¹ Items with an asterisk are those that are disaggregated by race and gender and align with the Males of Color pledge

- Cost per student for high school summer school credit recovery
- Cost of summer school per high school student
- Cost per student of virtual courses for credit recovery
- AP course costs per passing AP score
- Early college costs per participant
- Cost of extended learning time initiatives as percent of district budget
- Cost of intervention programs as a percent of district budget
- Cost of instructional coaches as a percent of district budget
- Cost of supplemental education services as a percent of district budget
- Cost of supplemental education services per student served
- Cost of supplemental education services per student served (district operated)
- Cost of supplemental education services per student served (contractor operated)
- Cost of substitute teachers as a percent of district budget
- ELL central office cost per ELL student
- ELL professional development costs for central office staff per ELL student

Special Education (Performance)

- Percent of students placed in each general educational setting by percent of time
- Percent of students with disabilities placed in private or separate settings
- Percent of referrals that result in evaluations
- Percent of evaluations that result in eligibility
- Percent of referrals of ELLs that result in evaluations
- Percent of evaluations of ELLs that result in eligibility

Special Education (Costs)

- SPED budget—cost per student with IEP
- SPED budget—percent of district expenditures
- Professional development costs as percent of SPED budget
- Private or separate setting placement costs as a percent of SPED budget

- Private or separate setting placement costs per student
- Average cost per initial evaluation
- Cost of initial evaluations per new IEP
- Cost of reevaluations as a percent of SPED budget
- Average cost per SPED reevaluation
- Average cost for IEP meetings as percent of SPEDE budget
- Average cost per IEP meeting
- Total litigation/due process costs as percent of SPED budget
- Litigation/due process administrative costs as percent of SPED budget
- Litigation/due process awards, concessions & settlement costs as percent of SPED budget

**WALLACE FOUNDATION PRINCIPAL
SUPERVISOR PROJECT**

Wallace Foundation

Addendum to *Rethinking Leadership*

Introduction: The Principal Supervisor Initiative

Following the release of *Rethinking Leadership: The Changing Role of Principal Supervisors* in the fall of 2013, The Wallace Foundation embarked on an effort to advance district planning around the strategic uses of principal support and supervisory structures. After inviting 23 districts with the willingness and potential to change their principal supervisor positions to submit proposals, Wallace chose six “core” districts to participate in a new effort, the Principal Supervisor Initiative (PSI). The six districts selected originally were Broward County, FL; Cleveland, OH; DeKalb County, GA; Des Moines, IA; Long Beach, CA; and Minneapolis, MN.¹

In addition, two other districts were selected —Tulsa Public Schools and the District of Columbia Public Schools. They had already taken steps to strengthen the role of principal supervisors by reducing the number of principals they oversee, downplaying compliance, and building supervisors’ skills. These districts received smaller grants to advance their work in this area.

The Principal Supervisor Initiative aims to support the districts over the course of four years as district and project leaders work to change the position description and orientation of the principal supervisor role from one of administrative compliance to one of instructional support for principals. The initiative was also designed to yield important lessons about how district central offices can be changed to support principal supervisors, and to assess the effectiveness and impact of these activities on principal effectiveness across districts.

Wallace has enlisted the Council of the Great City Schools to provide technical assistance to the eight districts.

Purpose and Methodology of Site Visits to PSI Districts

In early 2015, Wallace enlisted the Council of the Great City Schools to visit each of the eight new PSI school districts. The purpose of these visits was to gather information on where the districts were at an early stage in the work and to offer strategic observations and advice to help each project team plan out priorities and next steps.

In advance of the site visits, the Council team reviewed a variety of documents and information, including district organizational charts, job descriptions for principal supervisors and principals, documentation of the selection process for principal supervisors and principals, agendas from district-wide meetings with principals, evaluation instruments, and documents used by principal supervisor to provide feedback to principals.

¹ After the first year of the PSI project, DeKalb County, GA dropped out of the PSI cohort and was replaced by Baltimore City Public Schools.

The team then worked with project staff to develop an agenda and schedule numerous one-on-one interviews and focus groups over the course of a two-day visit. In each district, the Council team spoke with the superintendent, Wallace PSI project staff, curriculum staff—including the chief academic officer, subject area directors (e.g., math, ELA, science) and/or grade level directors (elementary, secondary)—ELL and special education directors and staff, principal supervisors, and principals.

After completing these meetings, the Council team held a debriefing session with district staff to share their observations and provide recommendations to help district and project leaders meet their objectives in strengthening the role of principal supervisors and in meeting their broader academic goals.

Findings

This unique opportunity to visit districts at the onset of the grant initiative made these visits different from the visits to Principal Pipeline Initiative sites chronicled in *Rethinking Leadership*. These visits were forward-looking in nature, rather than summative, and they were intended to provide districts with real-time technical assistance and course corrections where necessary, rather than to yield any concrete findings or conclusions. However, as with the Council team’s visits to the Principal Pipeline districts two years earlier, the team observed certain common overarching themes.

To start with, the span of control for principal supervisors was generally already more narrow across PSI districts than in many other districts, meaning that even before their involvement in the PSI project these districts had already taken steps to limit the number of school sites each supervisor oversaw. Each district had also taken a hard look at the deployment of principal supervisors—both how schools were grouped, and how principal supervisors could be strategically assigned to school sites based on their background and expertise. Finally, principals across these districts reported that, even at this early stage in the Wallace grant, they were already starting to notice a more instructional focus in their meetings and conversations with their supervisors.

All of these findings were promising, and reflected the fact that districts were chosen to participate in the initiative based on their demonstrated interest and commitment to shifting the role of principal supervisors from one of administrative operation and compliance to one of academic and instructional leadership.

However, as with the first round of site visits that informed the *Rethinking Leadership* report, the Council’s site visits to the new PSI districts revealed several common areas in need of improvement. Specifically, the Council observed a set of 8 overarching needs shared by all or most of the PSI districts.

- 1. *A shared need for greater clarity in the role of principal supervisors.*** To start, a majority of the PSI districts recognized the need to better articulate and communicate throughout the organization the role of principal supervisors—both what these staff are responsible for, and what they *aren’t*. The lack of clarity observed in many of these districts led to competing demands on principal supervisors’ time and attention—demands that often limited the amount of time they could spend in schools providing

hands-on, instructionally-focused support for principals. While some districts had taken steps such as carving out only one day a week for all central office meetings, principal supervisors across these districts still reported struggling to balance their new site-based instructional leadership roles with traditional administrative responsibilities and their roles as central office leaders.

2. ***The need to ensure greater quality and consistency among principal supervisors through strategic planning and deployment.*** The need to build greater consistency in the quality and focus of principal supervisors' work with schools was a commonly observed theme. At times the team observed great variation in the background knowledge and instructional expertise of principal supervisors within a district, and these differences translated into principals receiving very different levels and quality of support. The site visit team also saw varying configurations and approaches to principal supervisor school assignments. While some districts have been purposeful in these decisions, others still need to do more work to strategically match the expertise of principal supervisors to the needs of their schools. As the Council noted in the conclusion to *Rethinking Leadership*, principal supervisors have the potential to provide a critical link between central office leadership and resources and building-level personnel, but may easily be overlooked or squandered amidst competing priorities and constraints of time or skill. In order to take full advantage of principal supervisors, districts need to ensure that the quality of support being provided to schools and principals are consistent throughout the school system.
3. ***A shared need for support and ongoing professional development targeted to principal supervisor roles.*** While principal supervisors have generally been selected on the basis of having been strong school leaders, they still require substantial professional development in order to effectively provide instructional leadership and support for the schools and principals they oversee. For example, principal supervisors are often expected to serve as coaches, but with little to no specific training for the coaching aspect of their work.

Moreover, the Common Core State Standards and other college and career-readiness benchmarks have changed the landscape of teaching and learning dramatically in recent years, making instructionally-focused professional development more crucial than ever. As instructional leaders, staff in these roles need to have a deep enough understanding of these standards to know what to look for in school and classroom walk-throughs, and how to help principals advance implementation of the standards in all classrooms and for all students. However, in nearly all the PSI districts the team observed limited professional development opportunities for principal supervisors focused specifically on advancing their knowledge of content and instruction.

4. ***The need for further development of leadership pipelines.*** The Council team observed that leadership pipeline systems are also at very different stages across districts, and still a work in progress in many districts. Preparing future school and district leaders is often cited as a school system priority, but not one that is built in to the work and expectations of principal supervisors—or principals for that matter. For example, principal supervisors rarely mentioned identifying and nurturing future supervisors

from among the principals they oversaw, while few principals reported that mentoring or developing assistant principals and other school-level administrators for the principalship was a part of their role or an aspect of their performance evaluations.

- 5. *A shared need to improve communications among central office departments and to enhance outreach to principals.*** One of the most consistent observations across districts was a need to improve the lines of communication between school management units and curriculum units. The all-too-common lack of coordination between these departments ended up diluting the instructional focus of the support principal supervisors offered principals, as well as marginalizing the expertise and resources of the curriculum department. In fact, as districts work on structural reforms related to school leadership, instructional *content* is often the missing piece. Although the Council team heard the phrase “greater instructional focus” often during site visits, this focus ended up being heavy on process and pedagogy, but light on the actual content—a dynamic that wasn’t all that surprising given the wide gulf that exists between curriculum staff and principal supervisors.

To this end, a recommendation the team gave to a number of districts was to establish cross-functional teams and to conduct school and classroom walk-throughs together in order to develop a shared understanding of instructional quality and promote greater collaboration.

The team also observed a common need for districts to build better mechanisms for collecting and acting on feedback from principals, and to more clearly charge principal supervisors with representing the needs and perspectives of principals at the district level.

- 6. *The need to pick up the pace of developing principal supervisor evaluation systems.*** While some PSI districts have made more progress developing principal supervisor evaluation rubrics and protocols, this was commonly cited as a next step in the work being undertaken as part of the Wallace Foundation. These evaluations are crucial for clarifying expectations and roles, and for holding principal supervisors accountable for meeting the needs of principals.

While each district will need to develop evaluations that reflect district priorities, the team did share some common recommendations with the PSI districts that reflected the lessons and findings of the initial report. For example, principal supervisor evaluations should link to the evaluation procedures used for teachers and principals in order to build consistency in the expectations the district holds for both school and central office staff and leaders. Principal feedback should also be incorporated into the evaluation process for supervisors.

- 7. *The need to clarify the role of principal supervisors in advancing a district’s site-based theory of action.*** Many districts report having moved to a principal-centered system of support, but this system often lacks coherence or breaks down in practice. For example, principals in a number of districts voiced their frustration that, under new

district support structures, they are no longer clear about who they should reach out to for either instructional or operational support.

In fact, with the shift to a more instructional focus for supervisors, the team observed that in a number of districts operational responsibilities remain or fall back on the principals themselves, which would seem to defeat the purpose of reforming principal support and supervisory structures. It is not enough to decree that principals should now be instructional leaders—districts need to help them figure out how to juggle or delegate the other responsibilities they face as leaders and managers of school sites, from managing a budget to handling operational crises. Principal supervisors, for their part, should be tapped to help build this school-level capacity by clarifying for principals what resources exist at the central office and how traditional administrative responsibilities should be handled or re-assigned.

8. ***The need to set districtwide reform priorities, communicate a clear, actionable set of core objectives, and articulate the role of principal supervisors in light of these objectives.*** Finally, another finding that echoes what Council staff observed in our site visits to the Principal Pipeline districts was a shared need to establish core district priorities and ensure that school and district resources are tightly aligned to these priorities. This includes setting guidelines for a district’s work with external partners, and ensuring that they directly serve the district’s needs. Staff across districts reported being overloaded with disconnected, overlapping, or inconsistent initiatives—whether internally-driven or through external partnerships—and this lack of focus impeded district efforts to support and refocus the work of principals and principal supervisors.

Conclusion

The Council’s first round of site visits to the PSI districts afforded the project leadership teams in each of these school systems a rare opportunity to share their experiences at an early stage of project implementation, to assess their progress to date, and to use this information to shape their strategy moving forward. While these districts are diverse in terms of their management structures and overall district and state contexts, many of the challenges they face at this point in the Principal Supervisor Initiative they share with the other PSI districts, and with districts across the country.

While each district has taken at least the first steps to redefine the role of principal supervisors around instructional leadership, they have more work to do in articulating and communicating this new focus, in deploying these staff strategically and ensuring consistency in the quality of support for principals, and in equipping principal supervisors with the skills and *instructional* expertise they will need to perform effectively in these roles. This will require breaking down central office silos and ensuring that curriculum staff and school management staff work closely together to provide schools with clear, consistent guidance for implementing the district’s vision for high-quality instruction. Districts must also continue to build school and district leadership pipelines and to develop supervisor evaluation systems that reflect district expectations. Finally, districts should be clear about how their efforts to strengthen principal support and supervision—as well as

the full range of other reform initiatives and partnerships they pursue—ultimately serve the district’s needs and fit within their theory of action for improving student achievement.

The Wallace Foundation’s Principal Supervisor Initiative offers these districts an opportunity to address each of these areas and to build systemwide capacity for setting and meeting broader district objectives. It also builds on much of the work and results that came out of the Principal Pipeline district investments and were covered in *Rethinking Leadership*. Through regular contact, support, and monitoring of the PSI districts, the initiative will provide us with a first-hand look at how these districts manage the process of changing principal supervision and developing and supporting instructional leadership in schools.

SHELBY COUNTY SPECIAL EDUCATION REPORT

**IMPROVING
SPECIAL EDUCATION SERVICES
IN THE
SHELBY COUNTY SCHOOLS**

**Submitted to the
Shelby County Board of Education
by the
Strategic Support Team
of the
Council of the Great City Schools**



Winter 2016

Table of Contents

Acknowledgements.....4

Chapter 1. Purpose and Origin of the Project5

The Work of the Strategic Support Team 5

Methodology and Organization of Findings 6

Chapter 2. Background and Overview8

Chapter 3. Findings and Recommendations.....

I. Special Education Demographics

District Incidence Rates

Incidence Rates by Disability Area.....

District Incidence Rates by Disability and Grade

Disability Incidence Rates by Race/Ethnicity

English Language Learners

AREAS OF STRENGTH

OPPORTUNITIES FOR IMPROVEMENT

RECOMMENDATIONS

II. Multi-Tiered Systems of Support

Overview of RTI² in the District

RTI² - Academics

Written Information

Core Curriculum in Literacy

Universal Screening and Progress Monitoring

Increasingly Intensive Academic Intervention.....

English Language Learners.....

RTI² Behavior.....

Separate Systems for Academics and Behavior.....

School-based Implementation.....

Using Data to Drive Positive Changes

SCS Mental Health Center

Alternative Schools.....

Special Education Evaluation and Eligibility

State and Local Requirements.....

Focus Group Participant Feedback.....

AREAS OF STRENGTH

OPPORTUNITIES FOR IMPROVEMENT

RECOMMENDATIONS.....

III. Teaching and Learning for Students with Disabilities

Education of Young Children Ages Three to Five Years.....

Achievement Outcomes for Children with IEPs (Three to Five Years of Age)

Educational Settings of Young Children Three to Five Years of Age.....

Feedback from Focus Group Participants.....

Student Achievement on the NAEP and Statewide Assessments

NAEP Achievement Rates for Fourth and Eighth Grade Students with IEPs.....

Statewide Assessments

Focus Group Concerns about Assessment

Educational Settings.....

Educational Setting Rates
Educational Setting Rates by Race/Ethnicity
Inclusive Academic Instruction, Intervention, and Supports
Instruction Based on Core Curriculum
Intensive Interventions.....
Assistive Technology
Supporting Positive Behavior of Students with Disabilities
Out-of-School Suspension Rates for Students with Disabilities (August 1st to December 15th for 2014 and 2015).....
Focus Group Participant Feedback
Instruction for Students in Self-Contained Programs and in Special Schools.....
Specialized Programs and Schools
Behavior and Communication Programs.....
Adaptive Functional Skills and Functional Skills Programs
Professional Learning
Postsecondary Transition.....
Graduation and Dropout Rates.....
Importance of Community-Based Work Experiences for Students with Disabilities.....
Teacher Evaluation.....
Facilitating Parent and Community Involvement
AREAS OF STRENGTH
OPPORTUNITIES FOR IMPROVEMENT
RECOMMENDATIONS
IV. Support for Teaching and Learning for Students with IEPs
Interdepartmental Collaboration
Academic Team
Schools and Leadership
Administration and Operation of Special Education
DEC's Organizational Structure
School-based Special Education and Related-Services.....
Operational and Fiscal Issues.....
Transportation.....
Special Education Standard Operating Procedure Manual.....
Compliance and Dispute Resolution.....
Fiscal Issues.....
Procurement.....
Salary Equity.....
Maintenance of Effort
Reduction in IDEA Funds.....
Medicaid Reimbursement
Vouchers.....
AREAS OF STRENGTH
OPPORTUNITIES FOR IMPROVEMENT
RECOMMENDATIONS.....
Chapter 4. Summary of Recommendations
Recommendation Matrix.....
Summary of Recommendations

Chapter 5. Synopsis and Discussion

Appendices

Appendix A. Incidence Rate and Staffing Survey Results

Appendix B. Current and Proposed Organization.....

Current Organization.....

Proposed Organization Chart.....

Appendix C. Data and Documents Reviewed

Appendix D. Agenda and Individuals Interviewed.....

Appendix E. Strategic Support Team

Appendix F. About the Council and History of Strategic Support Teams

ACKNOWLEDGEMENTS

The Council of the Great City Schools thanks the many individuals who contributed to this review of special education programs in the Shelby County Schools (SCS). 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 Dorsey E. Hopson, II, the school district's superintendent. It is not easy to ask one's colleagues for the kind of reviews conducted by the Council's teams. It takes courage and openness and a real desire for change and improvement.

Second, we thank the SCS school board, who approved conducting this review. We hope this report meets your expectations and will help improve special education services across the school system.

Third, we thank school district staff members who contributed to this effort, particularly Dr. Heidi Ramirez, chief academic officer, and Dr. Patricia Toarmina, exceptional children director who organized and facilitated the interviews and ensured that data and documents requested by the team were provided. We also thank Ms. Barbara Leaks, executive assistant to the exceptional children director, who organized all the details and logistics for the team's review. Her efforts were extraordinary and much appreciated. Most people have no idea how much time and effort are 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 their children and ensure the school district serves these students in the best possible manner.

Fifth, the Council thanks Sowmya Kumar, assistant superintendent for special education services in the Houston Independent School District and Will Gordillo, former special education director in the Miami-Dade County and Palm Beach County school districts. Their contributions to this review were enormous. 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 outcomes for all our urban students.

Finally, I thank Julie Wright Halbert, the Council's legislative counsel, who facilitated the work of the team prior to and during the team's site visit, and Sue Gamm, a nationally known expert in special education and a 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. PURPOSE AND ORIGIN OF THE PROJECT

Shelby County Schools Superintendent Dorsey E. Hopson, II, and the Shelby County school board asked the Council of the Great City Schools to review the district's services for their exceptional education students, and to provide recommendations for improving those services and narrowing the achievement gap between students with disabilities and their nondisabled peers. It was clear to the Council team that the superintendent and his staff had a strong desire to improve student outcomes in this area. This report was designed to help the school system achieve its goal and maximize its capacity to educate all students effectively.

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 across the country. These individuals also have deep expertise with the Individuals with Disabilities Education Act (IDEA) and are well versed in best practices in the administration and operation of special education programming.

The Council's Strategic Support Team (the Council team or the team) visited the district on December 6-9, 2015. During this period, the Council team pursued its charge by conducting interviews and focus groups with district staff members and personnel from the Tennessee Department of Education, parents, advocates, and many others. (A list of those interviewed is presented in the appendices of this report.) In addition, the team reviewed numerous documents and reports, analyzed data, and developed initial recommendations and proposals before finalizing this report. (See the appendices for a list of documents reviewed.) During the week following the conclusion of its site visit, the team briefed the superintendent by phone on the team's initial conclusions and preliminary recommendations.

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 an effective approach 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 can call on for advice as they implement the recommendations, face new challenges, and develop 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 were:

<p><i>Sue Gamm, Esq.</i> Former Chief Specialized Services Officer Chicago Public Schools</p>	<p><i>Will Gordillo</i> Former Special Education Director Miami-Dade and Palm Beach county school districts</p>
<p><i>Julie Wright Halbert, Esq.</i> Legislative Counsel Council of the Great City Schools</p>	<p><i>Sowmya Kumar</i> Assistant Superintendent, Office of Special Education Services Houston Independent School District</p>

Methodology and Organization of Findings

The findings in this report are based on information from multiple sources, including documents provided by SCS and other organizations; electronic student data provided by SCS; group and individual interviews; email documents; and legal sources, including federal and state requirements and guidance documents. No one is personally referred to or quoted in the report although school district position titles are referenced when necessary for contextual reasons.

Chapter 2 of this report provides background information about the district, and Chapter 3 presents the Strategic Support Team’s (team) findings and recommendations. These findings and recommendations focus specifically on the areas that the superintendent and district’s leadership asked the Council’s team to focus on. These include the achievement of students with disabilities, including pathways to graduation; instructional supports and their relationship to student placements; organizational effectiveness; school leadership and oversight for special education; and use of fiscal resources.

A discussion of the focus areas listed is divided into four broad sections.

- I. Special Education Demographics and Eligibility for Services
- II. Multi-tiered System of Supports
- III. Teaching and Learning for Students with IEPs
- IV. Support for Teaching and Learning for Students with IEPs

The findings and recommendations section of each chapter contains a summary of relevant information, along with observations that outline district strengths, 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 discusses the team’s overarching impressions. The appendices include the following information:

- Appendix A compares incidence rates and staffing ratios in 66 major school systems across the country.
- Appendix B lists documents reviewed by the team.
- Appendix C lists individuals the team interviewed individually or in groups, and presents the team’s working agenda.
- Appendix D presents brief biographical sketches of team members.

- Appendix E presents a brief description of the Council of the Great City Schools and a list of Strategic Support Teams that the Council has fielded over the last 15 years.

CHAPTER 2. BACKGROUND AND OVERVIEW

Since the mid-1960s, and more recently, the system of schools educating children in the City of Memphis has undergone dramatic changes. In the mid-1960s the Memphis City Schools (MCS) educated some 130,000 students, about half of whom were either white or African Americans who attended largely segregated schools. In 1973 a federal court ordered the school district to integrate its schools using busing as the major tool. This action met with massive public resistance and the district's 71,000 white student population dropped by 40,000 over the next four years.¹

Changing District Organization

By 2011, MCS's enrollment had fallen to about 103,000 students, most of whom were African American and economically disadvantaged, and the district was suffering financially. The Shelby County School District, by contrast, which surrounded Memphis was smaller and more affluent system, serving mostly white students.

During this period, the state of Tennessee (TN) delegated to each county the authority to provide public education for all students residing in its jurisdiction. MCS, however, operated a special school district within the county of Shelby. In a bold strategy to address the dwindling fiscal resources the city had to support its schools, the residents of Memphis voted to dissolve its school charter and hand management of its schools to Shelby County. Beginning in July 1, 2013 all Shelby County residents, including those in the city of Memphis were served by SCS, increasing the newly merged district to some 150,000 students.² The process of merging lasted only one year.

Following the passage of a new state law that lifted the ban on establishing new school districts, the six incorporated suburbs in Shelby County voted to establish their own municipal school district—thereby doing the opposite of what Shelby had done. So, the 2014-15 school year began with the Shelby County Schools serving only the City of Memphis and the unincorporated areas of the county, which resulted in SCS educating students with approximately the same demographics as the previous Memphis City Schools.

In three years, Memphis staff and students operated under three different school jurisdictions and school boards. This continuous shifting of organizational structures and boundaries required substantial staff attention to handling transitions and operating processes, while an emphasis on teaching and learning initiatives took a back seat—undermining both student achievement and staff morale.

¹ In Memphis Classrooms, the Ghost of Segregation Lingers On, Sarah Garland. Retrieved from <http://www.theatlantic.com/national/archive/2012/02/in-memphis-classrooms-the-ghost-of-segregation-lingers-on/252992/>.

² *Id.*

SCS Current Demographics

SCS currently educates some 114,760 students in 225 schools. It is the largest public school district in Tennessee, and the 22nd largest public school district in the nation. The SCS's student population continues to be predominantly African American (76.3 percent). The balance of the student enrollment is comprised of students who are Hispanic (12.3 percent), white (7.6 percent), multi-racial (2.0 percent), Asian (1.6 percent), and American Indian (0.1 percent). Some 12.7 percent of all students enrolled in the district receive special education services. English language learners (ELL) account for 6.6 percent of the district's student enrollment and 6.4 percent of these ELL students also receive special education services.

Organization of Schools

SCS has a wide variety of school offerings for students. In addition to traditional elementary, middle, and high schools, there are schools that offer unique programs, such as--

- 47 optional (e.g., magnet) schools, which are based on such themes as aviation, dual language immersion, etc.;
- 17 i-Zone schools;³
- 16 schools with blended learning;
- 9 alternative schools; and
- 2 special schools for students with disabilities.

In addition, 44 schools operate under a SCS charter. Tennessee's Achievement School District (ASD) has chartered another 26 schools that are located in Memphis. The ASD was established under Tennessee's Race to the Top grant by the state to run schools taken over by the state because of low academic achievement. Only two schools with an ASD charter are located outside of Memphis.⁴

Based on 2015-16 enrollment data that SCS provided to the Council team, charter schools (11,981 students), optional schools (36,915 students), and alternative schools (870 students) comprise 42.6 percent of SCS's total student enrollment.

Special Education Vouchers

One other development that will affect SCS next school year involves the state's new voucher program. Under the Individualized Education Act an eligible student may receive about \$6,600 in individualized education accounts (IEAs) that may be used for various educational purposes. Currently, students with the following disabilities are eligible for an IEA: autism, hearing impairment, intellectual disability, orthopedic impairment, traumatic brain injury, visual impairment, and deaf-blindness. Students with an IEA must either be enrolled in a private school or be homeschooled, and their parents must waive all rights of the student to IDEA services, including associated funding. School districts are not required to provide any special education services to these students and are not accountable for their academic progress. The state deducts

³ Through an application process, i-Zone schools receive additional funding through a School Improvement Grant (SIG) to implement one of four state-approved turnaround models in order to improve student achievement.

⁴ Retrieved from <http://www.arktimes.com/ArkansasBlog/archives/2015/12/30/tennessee-sees-increasing-pushback-on-state-run-achievement-school-district>.

the IEA funding for SCS students who enroll in the program directly from the school district's Basic Education Program funding allocation, and provides the per child allocation to each enrolled student's parent/guardian. Parents are solely responsible for determining how to use the IEA funds allocated to their child consistent with provisions of the program.⁵ Additional information about this voucher program will be discussed in a subsequent section of this report.

Standards and Assessment

Like most other members of the Council of the Great City Schools, SCS is in a state that has adopted the Common Core State Standards. Still, Tennessee continued to use its Tennessee Comprehensive Assessment Program (TCAP) assessments through 2014-15. New measurements of learning for English and language arts (ELA) and math, the Tennessee Ready (TNReady), will be administered in the current 2015-16 school year. The state also requires End-of-Course assessments, which may be based as an alternative performance assessment for students with disabilities who meet specified criteria.

⁵ IEA Frequently Asked Questions, retrieved from <http://tn.gov/education/topic/iea-faq#sthash.BW8Qg2oV.dpuf>.

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MALES OF COLOR INITIATIVE

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 School District
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	New York City Department of Education

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	

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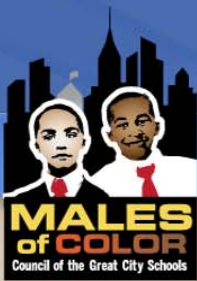


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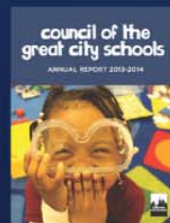
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**KEY PERFORMANCE INDICATORS: MALES OF
COLOR**

Key Performance Indicators Council of the Great City Schools

Males of Color

- Percent of students advancing from pre-k to k*
- Percent of third graders proficient in reading*
- Algebra I completion rate for credit by grade 9*
- Ninth grade course failure rate—one core course*
- Ninth graders with B average (GPA) or better*
- Absentee rate by grade level*
- Suspension rate*
- Instructional days missed per student due to suspensions*
- Percent of students placed in each general educational setting by percent of time*
- AP participation rate*
- AP-equivalent participation rate*
- AP exam pass rate*
- Early college enrollment*
- Four-year graduation rate*
- Five-year graduation rate*

DISTRICT INITIATIVES

Males of Color Initiatives in America's Great City Schools:

Follow Through on the Pledge: As of March 15, 2016

COUNCIL OF THE GREAT CITY SCHOOLS

Males of Color Initiatives in America's Great City Schools
By the
Council of the Great City Schools

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
Albuquerque		Convened "My Brother's Keeper Community Challenge Student Summit in January 2015 to assess needs, set priorities, and define goals.			
Anchorage	Named Mike Graham as the lead. Graham.Michael@asdk12.org (907) 742-4412 Developed "Actions and Measures" around each aspect of the Council's pledge.	Held a community dialogue on issues with the NAACP on February 18, 2015.	Actions on preschool will target students with highest needs, smaller class size, gender balance in programming, collaboration with Kids Corps/Head Start, and collaborating on kindergarten readiness with ARISE	Middle school actions will include providing access to school counselors and extra school staff and before and after school interventions, provide special classes for students of color through Cook Inlet Tribal Council, gender balance in programming, after school programs	Specific and detailed data from the 2014-15 school year on each pledge element will serve as the baseline for district efforts and progress. The district's academic services department will provide quarterly updates on progress.

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
			community coalitions.	with 21 st century learning centers, and focusing on SEL skills and responsive teaching at two middle schools. High school actions include core team planning to support individual students, partnering with ANSEP on science and engineering academies, pre-AP training for teachers at ASD summer academy, CITC classes and interventions, professional development in math, after school and SEL programming.	Continue data collection through RTI and SEL programming.
Atlanta			Use state early learning standards to address social and emotional needs of pre-k	Develop and implement a district SEL initiative with common standards, culture, assessments,	Ensure dashboards include data on attendance, test scores, behavior, grades, and course

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
			students—and plan lessons around them.	<p>interventions, and curriculum.</p> <p>Enhance the district’s multi-tiered systems of supports (RTI), including RTI specialists, interventions, training, and supports.</p> <p>Review the district’s wrap-around services and enhance where needed.</p>	completion—and disaggregate by race and gender.
Austin	<p>Created the districtwide “No Place for Hate” initiative.</p> <p>Established principals’ council subcommittee on race and equity.</p> <p>Named Raul Alvarez as lead. (512) 414-8729 Raul.alvarez@austinisd.org</p>	<p>Communicated to all media and meeting opportunities about issues related to Males of Color.</p> <p>Partnering with Greater Calvary Rites of Passage, Inc. to prevent destructive behaviors; the</p>	Expanding birth to 3 partnership with AVANCE, Head Start.	<p>Established the Gus Garcia Young Men’s Leadership Academy, an all-male public school.</p> <p>Increased the number of culturally-sensitive mentors.</p> <p>Share promising practices for</p>	

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
		<p>African American Youth Harvest Foundation on culturally relevant family services; University of Texas at Austin on Project Males (Mentoring to Achieve Latino Educational Success; Communities in Schools on leadership development and support; Austin Voices for Education and Youth on youth empowerment; the Austin Urban League on the Young Men’s Leadership Academy; the University of Texas on equity symposia; Prairie View A&M University and</p>		<p>working with males of color at expanded monthly cabinet meetings.</p> <p>Develop curricular resources that address needs of Males of Color.</p> <p>Student motivational and inspirational assemblies with Manny Scott, and character-centered leadership workshops, and student roundtables.</p> <p>Establish Males of Color Council.</p>	

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
		justice system on changing counterproductive behaviors.			
Baltimore	<p>Initiated the City Schools MBK Model around readiness to learn, reading on grade level, graduating college and career ready, completing postsecondary education, entering the workforce, and reducing violence.</p> <p>Has hired a project manager to support the integration of various strategies, plan activities, conduct a community resource audit, and engage philanthropic groups.</p>			<p>Expose Males of Color to professional men of color, build relations, and receive guidance. (Reading buddies, career day, lunch mentors)</p> <p>Allow Males of Color to spend time in various setting with professional men of color. (Career day, company visits, job shadowing, professional men of color clubs, hero networks, sports figures.)</p>	
Boston	Developed “Opportunity. Access. Equity: My Brother’s Keeper Boston—Recommendations for Action” with the Office of the	Mayor established MBK Boston Advisory	Set goal of expanding access to high-quality pre-k for all 6,300	Set goal of lengthening the school day in 60	

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
	Mayor as part of MBK Community Challenge	<p>Committee in September 2014.</p> <p>Set three MBK Milestones: (1) Graduating from high school ready for college and career, (2) Successfully entering the workforce, (3) Reducing youth violence, and providing a second chance.</p> <p>Partnered with city agencies, including the Boston Public Schools, and the Black and Latino Collaborative</p> <p>Expanding partnership registry to allow better management and coordination of resources.</p>	four year olds by 2020.	<p>schools in BPS over the next three years.</p> <p>Set goal of increasing access to rigorous and culturally relevant curriculum and instruction.</p> <p>Set goal of making BPS a premier Digital District by 2020 and investing in a major capital plan to improve all 133 BPS facilities by 2024.</p>	

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
Bridgeport	<p>The Bridgeport Board of Education established an ad hoc committee to address the objectives in the pledge. The committee is reviewing data along with the board’s curriculum committee, disaggregating data for males of color, and developing recommendations to the full board.</p> <p>Named Gladys Walker Jones gjones@bridgeportedu.net and Melissa Jenkins mjenkins@bridgeportedu.net as leads</p>				
Broward County	<p>Developed the Mentoring Tomorrow’s Leaders (MTL) program for minority males attending Deerfield Beach High School and Nova High School.</p> <p>Developed a video message from the superintendent to schools outlining mission to change disciplinary practices.¹</p>	<p>Developed work groups with internal and external stakeholders, e.g., the Committee for Eliminating the School-House to Jail-House Pipeline.¹</p>		<p>Establishing the “Mentoring Tomorrow’s Leaders initiative for Males of Color at two high schools.</p>	<p>Developing district oversight mechanisms for data collection and to monitor school practices.¹</p>

¹ From Rethinking School Discipline, July 22, 2015.

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
Charlotte-Mecklenburg	Named Earnest Winston as lead. 980-344-0010 (w) 704-634-7196 (c) earnest.winston@cms.k12.nc.us				
Chicago	Named Chanel King as lead. Cking1@cps.edu				
Cincinnati	Created the M.O.R.E. (Men Organized, Respectful, and Educated) program in 2011 to support the district's males of color. District has a M.O.R.E. Program Coordinator.			Have placed M.O.R.E. clubs in 15 elementary and 11 middle and high schools. Programs focus on students in grades 4-12 to promote higher student achievement, grade-level promotion, graduation, conflict resolution, self-esteem, and college readiness. Programs include after-school efforts that focus on leadership, citizenship, financial literacy, health/wellness, college and career	Data on all M.O.R.E. club participants is entered into data system and tracks progress of students on grades, attendance, tardy rate, disciplinary referrals, reading, math, social studies, science, GPA, failing courses, and ACT and SAT scores. Data are reviewed quarterly. Data show that program participants have better outcomes.

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
				awareness, academic support, social skills, and more. Clubs meet twice per week with 20-25 male students.	
Clark County (Las Vegas)	Strategic Plan includes Cultural Competency Training for all school district administrators and school police.	Working cooperatively with City of Las Vegas around “My Brother’s Keeper” Initiative which aims to close achievement gaps and address the disproportionate number of African-American and Hispanic men who are unemployed or in the criminal justice system.	Pre-K provided to schools with high numbers of students of poverty and English Language Learners. These classes are capped at a ratio of 10 students to 1 adult.	Increased the rigor of the Nevada Academic Content Standards Increase of K-8 dialogue and collaboration through monthly Performance Zone meetings. Mentoring program for males of color in select schools. Men Mentoring Men	Beginning stages of implementing a Data Dashboard to strategically track students of color (Credit sufficiency, counselor contacts, hard and soft expulsions, and other discipline data. Transparent gap data by school and Performance Zone posted online.
Cleveland			Working to ensure that preschool efforts better serve Males of Color.	Implementing elementary and middle school efforts to increase pipeline of young	Monitor progress of Males of Color and appropriately intervene at earliest signs.

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
			Increase number of seats rated 3 stars by adding staff and forming partnerships.	Males of Color succeeding academically and socially. Expand PATRHS—teaching 5 competencies of SEL, CTAO feeder school work, summer literacy program for intensive intervention.	Use NWEA, RIMPS (grades 1-3), on-track cohorts (grades 9-12), credit recovery, OGT prep, active counseling, blended learning, and intervention courses.
Columbus	Developed the “Males of Color Pledge Implementation Report” Board of Education passed a resolution approving the Council’s pledge on June 3, 2014.	Partner on early-childhood initiatives with Ohio State University, the city’s Early –Start Columbus initiative, the YMCA Head Start program, and the Franklin County Early Childhood center Partnering with American Electric Power and	District offers 750 four year olds developmentally appropriate early childhood programs in 41 elementary schools aligned with the State Early Learning Content Standards taught by teachers with either pre-k certification or a master’s degree in early childhood education.	Participate in the state’s Third-Grade Reading Guarantee that requires districts to assess third grader’s reading proficiency and develop plans for students below grade level that includes summer school and literacy coaching. Students below the state-determined cut score are retained, but beforehand are	

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		<p>Columbus State Community College on dual enrollment STEM courses at two schools.</p> <p>Partnering with Diplomas Now, Communities in Schools, City Year, Directions for Youth and Families, I Know I Can, Project Key, Learn 4 Life, and Learning Circle on attendance, discipline, and academic issues.</p> <p>Superintendent was appointed to Greater Columbus Infant Mortality Task Force, and district partners with children’s hospital, and others</p>	<p>Program also provides family outreach, health and social services, and kindergarten transitions.</p> <p>Literacy data show participants need less intervention in kindergarten than non-participants.</p>	<p>provided with 120 minutes per day in literacy instruction and 60 minutes of intervention. Have 30 teachers trained in Reading Recovery, and 800 volunteer Reading Buddies who read with students twice a week. Data show that more students are being promoted to the fourth grade.</p> <p>Data on OGT show that African American students improving reading, writing, and social studies achievement faster than district rates, narrowing gaps.</p>	

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		on children's health issues.			
Dallas					
Dayton	Board approved district participation in Males of Color initiative.	Participate in the City of Learners initiative and align activities to district goals, metrics, and reporting. Collaborate with the city on a Males of Color Go Back to School Event.			
Denver			Increase mill levy to expand full day ECE for all 4-year olds, and expand seats for 3-year olds in partnership with community providers targeting underserved areas. Partner with community to increase quality, establish standards and assessments, and increase	Increase rigor of common core implementation. Increase tutoring. Expand partnerships, enrichment, and engagement. Expand social emotional supports, mentoring, pre-collegiate information, CTE offerings, and pilot a	Conduct opportunity quartile study to identify groups for intervention and targeted investment.

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			resources for summer reading-loss programs, particularly for ELLs	personalized learning project.	
District of Columbia	<p>Developed a five-point plan called “A Capital Commitment” to increase achievement rates, improve literacy, invest in 40 lowest performing schools, increase attendance and graduation rates, improve student satisfaction, increase AP participation, college admissions, and career preparation, and increase enrollment.</p>	<p>Announced \$20 million “Empowering Males of Color” initiative with the mayor and partners on January 21, 2015. Built around a three-pronged theory of action: Engage students, family and community; improve and expand implementation of research-based strategies; innovate and challenge approaches to improving achievement.</p> <p>Held fund-raiser lunch for a male</p>	<p>Established a three-school pilot program with professional development to support school readiness for Males of Color.</p>	<p>Set up “500 for 500: Mentoring through Literacy” program to ensure reading on grade level by grade three.</p> <p>Collaborating with external organizations to decrease summer learning loss.</p> <p>Set up Honor Roll Luncheons to recognize students for success and encourage progress.</p> <p>Revised elementary and middle school promotion/retention policies to rely more on data and less on teacher judgment.</p>	<p>Developed Equity Scorecard with measures that all schools will use to compare student performance. Measures include student proficiency, AP enrollment and performance, graduation rates, suspension rates, attendance, and student satisfaction.</p>

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		academy and follow-up activities.		Provide two-year grants to schools through the DC Education Fund to support efforts to improve social and emotional well-being of Males of Color, community and family engagement, or academic enrichment.	
Duval County	Named Larry Roziers roziersl@duvalschools.org as lead.		<p>Introduced Success by Six at two schools.</p> <p>Expanded access to three-year old programs in low-income areas from 800 to 1,450 students</p> <p>Partnered with Head Start in public schools.</p>	<p>Revised elementary and middle school promotion and retention policies to ensure high expectations based on data-driven measures aside from “teacher judgment.”</p> <p>Redesign summer school offerings and regular school schedules based on early warning system to provide ready access to</p>	<p>Developed modern, integrated early-warning tracking system (Performance Matters) to ensure all students on-track for graduation. Tracks attendance, suspensions, grade, and state test results. Allows teachers to follow students if they change schools.</p>

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				<p>coursework for students at risk of dropping out.</p> <p>Expanding overage schooling for students in grades 5-10 to individualize course recovery.</p>	
El Paso	<p>MBK District Points of Contact:</p> <p>Manuel Castruita, Director, Guidance Services (mcastrui@episd.org)</p> <p>Ray Lozano Executive Director, School Leadership Operations (rslozano@episd.org)</p> <p>Campus Points of Contact (POCs) lead efforts at the campus level. Student mentorship programs established at all comprehensive high schools. Mentorship at all middle schools will begin in Fall 2015. Students mentored by District personnel. Will explore mentorship opportunities by non-District personnel in Fall 2015.</p>	<p>One of three districts statewide selected for participation in Project MALES (Mentoring to Achieve Latino Educational Success). Project is led by The University of Texas and Texas A&M.</p> <p>Engaged in partnership with the University of Texas at El Paso to establish a collaborative mentorship program at one</p>	District will launch Pre-K center in August 2015.	<p>Implementing AVID at selected middle schools to promote college awareness and readiness.</p> <p>Analyzed advanced course enrollment and success rates at all middle and high schools and identified opportunities for increased enrollment.</p> <p>Offering PSAT grades 9th through 11th and SAT to all 11th grade students to bolster advanced course enrollment.</p>	Data tracking system is in development.

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	<p>In the process of creating a Social-Emotional Learning Department to support implementation of Positive Behavior Interventions and Supports at 43 Demonstration Schools.</p>	<p>high school. The university will select graduates from the selected high school for continued mentorship at the university level.</p> <p>Attended Texas Consortium for Male Students of Color Summer Leadership Summit in June 2014. Scheduled to attend in August 2015.</p> <p>Met with El Paso Community College Project MALES representatives to discuss opportunities for collaboration on student mentorship.</p> <p>In the process of establishing a partnership with</p>		<p>Exploring curriculum support options for advanced courses in middle and high schools at selected feeder patterns.</p> <p>Exploring venues to increase college matriculation.</p>	

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		<p>the United Way to support the Campaign for Grade Level Reading</p> <p>Alternative High School contracts with the El Paso Child Guidance Center to provide trauma counseling to students assigned to the campus.</p> <p>In the process of developing a leadership academy for mentored students.</p>			

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Fort Worth	<p>Has formed a My Brother's Keeper Task Force to develop action plan.</p> <p>Using a cross- functional team with the annual planning process to identify equity issues.</p> <p>Using district goals and targets to address equity issues.</p> <p>Named Jerry Moore and Ashley Paz as leads. (817) 814-2703</p>	Held "My Brother's Keeper Summit on February 21, 2015	<p>Began a Universal Pre-K program in 2014 and added 12 additional Pre-K classrooms in 2015.</p> <p>Pre-K enrollment available for all students in Fort Worth ISD.</p>	Hired Gifted and Talented Specialists at all Elementary campuses to support advanced learning opportunities for at least 10% of students in each student group at each campus.	Developed a Principal Daily Dashboard that automates and tracks grades, attendance, discipline, safety measures, and teacher attendance for each campus that can drill down to specific student groups and students.
Hillsborough County	<p>Hillsborough County Public Schools Males of Color Implementation Pan, 2014-2015</p> <p>Named Lewis Brinson as lead. (813) 272-4368 Lewis.brinson@sdhc.k12.fl.us</p>		<p>District will monitor observation, assessment and evaluation data on pre-k and Head Start teachers to determine areas of strength and need.</p> <p>Correlate VPK assessment results with Kindergarten Readiness Assessment to determine impact of program.</p>	Monitor outcomes of the Extended Reading Time initiative through observations in project schools.	<p>Use early warning system to monitor RTI/MTSS implementation and effects.</p> <p>Provide additional training on the use of the early warning system.</p> <p>Initiate cross-divisional meetings to better monitor outcomes and needed</p>

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			<p>Evaluate effect of new pre-k and Head Start expansion into high-poverty schools.</p> <p>Monitor implementation of pre-k professional development during walk-throughs.</p>		<p>supports in schools.</p>
Houston	<p>Named Annvi S. Utter to lead. autter@houstonisd.org 713-556-7104</p> <p>Formed Equity Council to support district's efforts to ensure equitable access to educational opportunities for all students.²</p> <p>Collaborated on "Improving the Quality of Life for Young Men of Color in Houston: Local Action Plan, 2015."</p>	<p>Partnering with the mayor and city department of health to implement MBK. Management team created.</p> <p>Goals include having males of color entering school ready to learn, reading at grade level by third grade, graduating from high school ready for college</p>	<p>Will convene key stakeholders to agree on best practices for a continuum of care to facilitate whole child development to ensure school readiness.</p> <p>Develop evidence-based metrics to evaluate school readiness.</p> <p>Implement recognized</p>	<p>Will build and enhance partnerships that support achievement and ensure that concerns and strengths of community groups are addressed.</p> <p>Will work with community organizations to promote in-school efforts.</p>	<p>Will determine baseline performance criteria and set measurable targets to meet goals.</p> <p>Will establish an early warning and intervention system that will prevent academic and disciplinary challenges from deteriorating into irreversible</p>

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		<p>and career, completing post-secondary education or training, successfully entering the workforce, and reducing crime and violence and providing a second chance.</p> <p>Was involved in MBK summit in Houston on November 134, 2014. Follow up involved 12 focus groups.</p>	<p>standards to ensure the quality of childcare providers and teacher.</p> <p>Will expand the number of children participating in high-quality full-day pre-K programs.</p>	<p>Will strengthen existing community partnerships that include wrap-around services, after-school, summer school, and tutoring programs.</p> <p>Will connect in-school literacy efforts to out-of-school services to advance children's literacy.</p> <p>Will increase access to print and electronic books to K-3 children by connecting families to donations and reading support services.</p> <p>Determine target-area pilot schools.</p>	<p>negative outcomes.</p> <p>Will set up an evaluation framework to assess effectiveness of the initiative.</p>
Indianapolis	Have developed "Your Life Matters: Plan of Action."	Partnering with the mayor, Indiana Black Expo, and the Indiana Civil		Partner with the Indiana Youth Institute, Big Brothers/Big Sisters,	Are developing with the task force measures of high school graduation,

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		Rights Commission on the Your Life Matters (YLM) Task Force. The task force includes 115 organization, agencies, and offices—and includes teams on education, employment, health, justice, and mentoring. The Indiana Black Expo (IBE) handles project management, data, management, and communications.		and 100 Black Men to expand mentoring opportunities for African American male youth.	out-of-school suspensions, attendance rates, behavioral issues, employment status of African American males ages 16-24, risk of referral to juvenile court, percentage of African American males returning to IDOC within 12 months, and deaths by homicide among African American males ages 15-25
Jackson	Named William Merritt as lead. wmerritt@jackson.k12.ms.us			Implementing and providing professional development for teachers and parents on the IMMC’s “New Strategies for Teaching African and African American History to African Americans.”	

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				Includes teaching African American history, culture, and leadership models to students in after-school and summer school program.	
Kansas City	<p>Males of Color Implementation Plan</p> <p>Named Luis Cordoba and Derald Davis (816) 418-7322 jcordoba@kcpublicschools.org dedavis@kcpublicschools.org as leads.</p>	<p>Held the “Am I My Brother’s Keeper” conference with 150 high school student.</p> <p>Working with Citywide Gateway Crime Task Force</p> <p>Convened a Student Diversity Leadership Conference: Building An Appetite for Diversity for seniors from four high schools.</p> <p>Held a Multicultural Leadership</p>		Initiated “Each One, Teach One” mentoring program for males of color involving high school students mentoring elementary students.	Created data dashboard to monitor progress of Males of Color on pledge elements and provide support. Metrics include graduation, attendance, college and career readiness, suspensions, expulsions, special education classifications, AP, and G/T

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		Symposium with Metropolitan Community College and participated in the Big XII Conference on Black Student Government.			
Long Beach		Held “Students of Color Town Hall Meeting” on February 28, 2015		Expand the Long Beach Male Academy.	
Los Angeles	School Board passed a resolution directing the superintendent to develop a districtwide plan for culturally and linguistically responsive education.				
Louisville			Continue CADRE menu of professional development of professional development geared toward the needs of “at promise” students.	Strengthen after school programs: Men of Quality Street Academy, REACH Program. Continue Louisville Linked program that provides wraparound services to students.	Establish dashboard to monitor the grades, attendance, behavior, and performance of students of color. Design interventions to “catch” students that are falling behind.

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					Present quarterly reports on each element of the pledge on Males of Color
Miami-Dade County	Implementing a Districtwide Equity Parity Plan. ²		<p>Collaborate with community groups to provide curriculum support, training, and advice to early childhood providers on how to better serve Males of Color.</p> <p>Leverage the Teenage Parent Program to provide information on pre-school opportunities to better serve Males of Color.</p>	<p>Implement a mentoring, life skills tutoring, career preparation and academic coaching model for Males of Color to provide successful transition to high school.</p> <p>Provide school-site guidance services to help Males of Color transition into high school STEM programs.</p> <p>Provide open houses and vocational fairs to better serve Males of Color.</p>	<p>Establish a data base to monitor diversity, equity, and access to educational practices for Males of Color—“District Data Tracking Dashboard.”</p> <p>Monitor performance of Males of Color to identify student needs in the areas of attendance, suspensions, and mobility—and provide needed interventions.</p>

² From Rethinking School Discipline, July 22, 2015.

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				<p>Provide information to stakeholders, businesses, and civic partners to Males of Color receive more mentoring and opportunities.</p> <p>Advertise schools of choice and parental options for Males of Color.</p>	
Milwaukee	<p>Developed a strategic plan called “My Brother’s Keeper: Improving the Life Outcomes of Boys and Men of Color—Implementation Plan.”</p> <p>Naming a new Equity Specialist.</p>	<p>Working with public health partners to ensure that students are immunized and ready for school.</p>	<p>Providing vision screenings for kindergarten students and other elementary students with special health or education needs.</p> <p>Also partnering with Smart Smiles program to provide oral and dental health services to students.</p> <p>Expanding sports physicals, offering</p>	<p>Partnering with Milwaukee Succeeds, Walgreens, and local universities to expand and strengthen out-of-school reading time and programming.</p> <p>Implementing Compass Learning Odyssey in all schools to help students work independently in areas of interest matched with a</p>	

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			<p>more health fairs, expanding wellness activities, and working with parents to coordinate health activities.</p>	<p>district screener: STAT.</p> <p>Implementing a Transformative Reading Instruction (TRI) model in five district schools with tutoring, parent workshops, experiential opportunities, and teacher professional development.</p> <p>Implementing a k-5 grade literacy curriculum that emphasized concept-based instruction to build stronger foundational literacy skills.</p> <p>Partnering with a variety of community groups to strengthen third grade reading skills: Boys and Girls</p>	

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				<p>Clubs, Milwaukee Repertory Theater, Reading Corps, and others.</p> <p>Implementing the Tutoring 4 You Program (T4U) in selected elementary schools to provide small-group tutoring for students who are below target in reading.</p>	
Minneapolis	<p>Hired Michael Walker as lead. (612) 668-0189 Michael.Walker@mpls.k12.mn.us</p> <p>Set up Office of Black Male Student Achievement with start-up budget of \$200,000 and five staff members.</p>	<p>Partnered with the University of Minnesota to develop a special curriculum for African American males centered around the Black male experience and history with a focus on character development and leadership. BLACK (Building Lives Acquiring Cultural</p>		<p>Piloting second year work (2015-16) at 8 elementary schools, 4 middle schools, and 4 high schools.</p> <p>Developing professional development at project sites focused on engaging Black males, linking communities, Black male voices, unconscious bias,</p>	

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		Knowledge) courses will be taught by local community experts in classes no larger than 20 students.		and the pedagogy of confidence. Expanding funds for AVID	
Nashville	Named Tony Majors as lead. Tony.Majors@mnps.org				
New York City	Named Ainsley Rudolfo as lead. (917) 940-6496 (c) Arudolfo@schools.nyc.gov				
Oklahoma City	Named Aurora Lora as lead. aalora@okcps.org (405)587-0448				
Orange County	Has developed a comprehensive plan around each element of the pledge called “Building Ladders of Opportunity for Boys and Young Men of Color.” Created the Minority Achievement Office (MAO) to narrow the achievement gap, improve academic outcomes, reduce discipline referrals, and increase graduation rates.		Researched best practices in promoting academic success at pre-k level. Gathered best practices from most successful pre-k teachers.	Compiled all data from standardized tests and disaggregated it to show performance of males of color in all grades. Convened a committee to develop a protocol for tracking	Collaborated with associate superintendent of accountability, research, and assessment to develop protocol to disseminate data regularly. Gathered team to discuss the data

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	<p>Empowering Environments strategic plan.⁷</p> <p>Named James Lawson as lead. (407) 317-3470 James.lawson@ocps.net</p>		<p>Discuss ways to better serve pre-k males of color</p> <p>Compiled academic and social development strategies and communications plan.</p> <p>Offered enhanced professional development for pre-k teachers.</p> <p>Monitored implementation, and tracked performance of pre-k males of color.</p>	<p>performance of Males of Color.</p> <p>Solicited input on plan from principals, curriculum, Title I, Multi-lingual, and ESE</p> <p>Set up early warning indicators for intervention.</p> <p>Set up procedure where committee is called if data suggest adjusting the protocol</p> <p>Shared protocol with area superintendents and all principals.</p> <p>Expanded MTSS system to 21 elementary and 4 middle schools.</p> <p>Established an accelerated reading</p>	<p>and establish timelines.</p> <p>Meet with principals at all grade levels to establish intervention procedures based on early warning data</p> <p>Implement protocols for monitoring data and intervening with students not on track.</p> <p>Execute appropriate interventions.</p>

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				<p>program at the third grade in 25 elementary schools</p> <p>Monitoring progress of elementary and middle school students</p> <p>Initiated the summer Scholars of Orange County Calculus Project at two middle schools, On the Record Reading at two middle schools, and 5th grade math at 10 elementary schools.</p>	
Palm Beach County		<p>Convened “My Brother’s Keeper Community Challenge Student Summit in January 2015 to assess needs, set priorities, and define goals. The Summit was led by the Chair of the County</p>	<p>Partnership with Head Start to ensure that all students, particularly boys of color, have received quality pre-K preparation by providing professional development for Head Start</p>	<p>The School District has purchased 8th and 9th grade PSAT for all 8th and 9th grade students to assess potential for Advanced Placement; AICE, and International Baccalaureate participation. The District has also</p>	<p>Created data dashboard to monitor progress of males of color. Metrics include graduation, attendance, college and career readiness, suspensions, and expulsions.</p>

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		Commission in partnership with the School District	teachers to ensure that the instruction is aligned with State Standards.	<p>expanded AVID to start in elementary/middle.</p> <p>Creation of JumpStart to High School Program for twice-retained students. In two years we have been able to successfully promote 237 students, 80% being Black or Latino males, to high school. 68% of them maintained at least a 2.0 GPA or higher.</p>	
Philadelphia		Working with the office of the mayor on a citywide strategy		Working with City Year in 11 schools to enhance learning environment and provide tutoring for students with low attendance, multiple suspensions, and low grades	

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Portland	<p>Names Jeanine Fukuda and Bonnie Gray as leads. (503) 916-3769 jfukuda@pps.net bgray1@pps.net</p>	<p>Partnering with Portland Trailblazers of NBA on third-grade reading.</p> <p>Partnering with Mayor’s Black Male Achievement Initiative, AT&T, Aspire, Cisco, JP Morgan Chase, College Board, and Youth Gang Task Force.</p> <p>Vetting entire plan with office of the mayor, school board, executive leadership team, District Equity and Inclusion Council, Superintendent’s Student Advisory Council, Portland Association of Teachers, PTA, Pacific Educational Group,, Coalition</p>	<p>Are creating early learning hubs in four targeted communities with partner agencies (including key culturally specific partners—Albina Head Start, Indian Education, Neighborhood House, Teen Parent Program, Oregon Community Foundation, Concordia University, Multnomah Education Service District, Native American Youth and Family Center, Home Forward, and Oregon Solutions).</p> <p>Expanded the number of children</p>	<p>Have set goal to have 100% of students meeting or exceeding reading benchmarks on Smarter Balanced Reading Assessments by the end of third grade.</p> <p>Using culturally aware classroom observation tools and third grade reading campaign, as well as engaging families of color in reading events and home libraries.</p>	<p>Will disaggregate all data on superintendent’s priorities by race, gender, and language.</p> <p>Designate staff from the Strategic Planning and Performance department whose primary focus is on data.</p> <p>Implement Early response System to identify students at risk and take appropriate action by NAME. (Indicators include attendance, behavior, and achievement.)</p> <p>Conduct case studies of schools with high achievement</p>

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		<p>of Communities of Color, Black Male Advisory Group, Coalition of Black Men, Delta Sigma Theta, Multnomah County Chair, All Hands Raised, Portland Business Alliance, City Club, Portland metro Education Collaborative.</p>	<p>participating in full-day pre-k programs.</p> <p>Offering universal kindergarten for every five-year old at no cost—was grant funded previously.</p> <p>Gathered research on best practices in pre-k.</p> <p>Enhanced professional development for pre-k teachers, kindergarten teachers, and community providers.</p> <p>Expanded early kindergarten transitions.</p>		<p>among African American students.</p> <p>Disaggregate school climate data by race and gender to ascertain student experiences.</p> <p>Track culturally relevant interventions that Black, Latino, Native American, and Pacific Islander students receive from staff and contractors.</p>
Providence	School Board approved a Males of Color Pledge Implementation		Expand the number of pre-k seats for males of	Infuse greater cultural relevance into the district's	Compile a comprehensive, disaggregated data

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	<p>Plan and will develop a policy on institutionalized racial equity.</p> <p>Will conduct a thorough examination of policies and practices to improve outcomes for Males of Color.</p>		<p>color by moving the early childhood program from Gregorian Elementary School to Asa Messer Elementary School.</p> <p>Work with state and city officials to expand the availability of pre-k opportunities.</p>	<p>academic curriculum and identify content that better responds to and engages Males of Color.</p> <p>Review policies to increase the access of adult male volunteers of color in the schools.</p> <p>Review policies to ensure that district buildings allow for more after-school community programs for Males of Color.</p> <p>Review human resource policies to increase recruitment, hiring, and retention of more educators of color.</p> <p>Identify and enhance initiatives that spur the academic growth</p>	<p>set on Males of Color to better understand and measure academic status, progress, and social/emotional development.</p> <p>Develop a set of key indicators of student outcomes on academic achievement, graduation rates, dropout rates, AP participation, FAFSA completion, pre-k enrollment, attendance data, discipline referrals, special education placements, and other.</p> <p>Will establish goals and targets in each area and monitor progress.</p>

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
				and social development of Males of Color, such as the Gilbert Stuart Gentlemen’s Association.	
Rochester	“We Will Treat Every Child Like One of Our Own: An Action Plan for the Rochester City School District”		District currently offers universal pre-k for every four year old at no cost to families— was mostly half-day programming in previous years.	<p>Move aggressively to ensure that all students are reading by the third grade.</p> <p>Expand summer school opportunities in order to cut summer learning loss, provide interventions, and offer enrichment.</p> <p>Continue Summer of Reading program that supplies students with backpacks of books and reading lists.</p> <p>Continue increasing the numbers of dedicated reading teachers.</p>	

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
				<p>Improve literacy content and instruction in multiple subject areas.</p> <p>Increase learning time by eliminating early dismissal of students every Wednesday and increase expanded-day schedules in elementary and secondary schools.</p>	
Sacramento	<p>Established Restorative Justice Task Force in 2014.</p> <p>Hired Assistant Superintendent of Equity in July 2015.</p> <p>Superintendent Co-Convened My Brother's Keeper (MBK) community meetings in 2015.</p> <p>District continues to co-lead Sacramento's Boys and Men of Color Collaborative and MBK Task Force</p>	<p>Co-Convened first My Brother's Keeper meeting with Systems Leaders in March 2015 along with Mayor.</p> <p>My Brother's Keeper Community Convening. Over 300 boys and girls of color (170+ from SCUSD) participated in</p>	<p>Expanded Transitional K program</p> <p>Implemented the First 5 Play is a FUNdamental play group program for infants and toddlers</p> <p>Opened 5 additional Early Head Start</p>	<p>Continued implementation of Social Emotional Learning (SEL) initiative district wide through 3 year NOVO Foundation grant</p> <p>Hired 3 coaches to support SEL and Positive Behavior Intervention and Support (PBIS)</p>	<p>Developing Data Dashboards to address Chronic Absence, Discipline and Academic Performance.</p>

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
	<p>Adopted Resolution to have Ethnic Studies as a graduation requirement by year 2020.</p>	<p>community conversation about three MBK initiatives: education, employment and safety.</p>	<p>Infant/Toddler classrooms</p>	<p>Started cohort of 9 PBIS schools</p> <p>Men’s Leadership Academy (MLA) program continues to provide culturally relevant instruction, social justice education and leadership opportunities to males of color within SCUSD. Developed cross-age mentoring program for MLA into Middle and Elementary Schools. Summer Matters programming targets boys and girls of color in high quality learning opportunities to prevent summer learning loss; incoming 1st – 12th grade.</p>	

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				<p>Children’s Defense Fund, Freedom Schools provided culturally relevant literacy program during summer at 3 elementary sites.</p> <p>City Year continues to provide intervention and support at 5 schools within SCUSD; focusing on attendance behavior and course performance.</p> <p>Youth Development Support Services provides expanded learning opportunities to 14,000 students targeting low-income/students of color. Culturally relevant programming is built around a Social</p>	

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
				<p>Justice Youth Development framework.</p> <p>Middle schools provided additional funding to support under performance in mathematics through data driven intervention programs.</p>	
San Francisco	<p>Developed the African American Achievement and Leadership Plan</p> <p>Hired Landon Dickey as Special Assistant to the Superintendent for African American Achievement and Leadership DickeyL@sfusd.edu (415) 515-5247</p> <p>Approved a school board resolution in support of African American achievement.</p> <p>Launched an African American Internal Oversight Committee to monitor district efforts, and an</p>	<p>Convened My Brother’s Keeper Local Action Summit in January, 2015 with the mayor and local foundations.</p> <p>Partnering with the mayor’s office and the San Francisco Foundation.</p>	<p>Developed plan to enhance Tier 2 and Tier 3 Behavioral RTI supports for PK – 3rd grade students</p>	<p>Launched African American Internal Oversight Committee to monitor a cohort of elementary and middle schools with African American students as a focal population</p> <p>Identified elementary, middle, and high schools with high African American</p>	<p>Convened staff team to evaluate African American student outcomes districtwide</p> <p>Launched African American Internal Oversight Committee to monitor a cohort of elementary and middle schools with African American students</p>

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
	<p>African American Community Council (AAAC) to provide external oversight of district efforts in support of black students. District will provide an “African American Student Report” to share progress.</p> <p>Budgeted \$800,000 to fund an African American Achievement and Leadership Initiative (AAALI) to support parent engagement, a postsecondary pathways program (that will connect all graduating African American 12th graders through LinkIn, provide alumni tracking, and provide coaching) provide school-site support and summer-school support.</p>			<p>achievement. Planning to case study schools over 2015 – 2016</p> <p>Transitioned support of the African American Parent Advisory Council (AAPAC) to the Superintendent’s Office and Special Assistant to the Superintendent, to help coordinate accessibility of resources and information for African American parents</p> <p>Launched MBK/SF Summer STEAM Program for K – 5th grade students</p> <p>Partnered with community-based organizations to pilot a summer reading program</p>	<p>as a focal population</p> <p>Identified academic, behavioral, culture and climate, and demographic measures to monitor acceleration of African American student achievement</p> <p>Developed CORF and BASIS data systems for tracking student referrals and behavioral interventions implemented at school sites, to reduce disproportionality of African American suspensions and expulsions</p>

City School System	Developed Strategic Plan and/or Hired Staff	Held Citywide Summit and/or Coordinating with City Hall or other partners	Launched or Expanded Pre-k (1)	Bolster Elementary and Middle School Pipeline of Academically Successful Students (2)	Developed Data Systems for Tracking (3)
				with a cohort of black families Launched Racial Equity Professional Learning Community at elementary school sites	Rolled out <i>Illuminate</i> data system districtwide which allows for more flexible analysis of school level and student level data
Toledo			RttT, SIG, Academic Turnaround, EWS, Inclusion, gender-based k-12.	Initiated the Young Men of Excellence mentoring program with 2,000 students Expanding credit recovery.	EWS, PBIS, Safe schools ordinance, mental health intervention.

Males of Color Initiatives in America's Great City Schools (continued 2)

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
Anchorage	Continue attendance policy implementation; make phone calls to student homes during absences; and continue school business partner recognition of students with good attendance. Track results.	Implement new drug/alcohol policy for reducing suspensions and expulsions through alternative placements; implement RTI social emotional framework; and produce quarterly and annual suspension reports.	Continue focus on recruiting under-represented students for gifted programs; intentional core team planning for under-represented students with potential for AP; provide AP training for 300 secondary teachers; continue NMSI grant at two high schools; promote performance scholarships; continue TRIO in three high schools; and continue college and career guides at	Participate in Education Matters Summit with focus on improving teacher preparation; continue ongoing meetings with University of Alaska and Alaska Pacific University; continue dual credit opportunities; and partner with ANSEP.	Continue ELL workshops for families; conduct Title VII workshops for families; promote FAFSA through TRIO in three high schools; provide support through CTE/counselor coordinators and promote FAFSA completion in three high schools.	Examine disaggregated data to inform instructional decisions and use RTI and intervention data with individual students.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
			three high schools.			
Atlanta		<p>Have set goal with state department of education to eliminate disproportionate suspensions of African American males by the end of the year.</p> <p>Expand PBIS from 123 schools to 24. Newly formed PBIS committee will review discipline and interventions.</p> <p>Provide weekly discipline updates to associate superintendents and principals to review and make adjustments.</p>	<p>PLCs of AP and IB coordinators are focusing on increasing enrollment, retention, and success of African American males in advanced courses.</p>			<p>Provide more inclusive environments for students with disabilities and provide additional training to lead and regular teachers.</p> <p>District is currently not disproportionate in special education.</p> <p>Using RTI to review and train staff around 504 accommodations. Continue monitoring to ensure that students are placed in LRE.</p>
Austin		Worked to reduce numbers of Males of				Hold special education workshops for

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		Color suspensions and expulsions. Establish partnership with Greater Calvary Rites of Passage and other groups to develop alternatives to out-of-school suspensions.				staff and teachers to build strategies for working with Males of Color during the admission and dismissal processes.
Baltimore		Diversion program and community conferencing. ³ Professional development in de-escalation and portfolio of school-based climate supports. ⁴ Re-engagement/intervention centers. ⁴				
Boston		Mayor's office created the Violence Interrupters Program and expanded its StreetSafe program to provide community support to youth and gang intervention services.		Set goal of increasing the diversity and cultural proficiency of BPS administrative and teaching staff.		

³ From Rethinking School Discipline, July 22, 2015.

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Bridgeport		<p>Goal to reduce out-of-school suspensions by 5% over two years.⁴</p> <p>Develop a systemwide approach to meeting students' behavioral, social, and emotional needs in order to reduce chronic absenteeism.⁵</p> <p>Implement RULER, an emotional intelligence program developed by Yale University.⁵</p> <p>Reduce school-based arrests through partnerships with police department and community agencies.⁵</p>				
Broward County		<p>Ended suspensions for non-violent activities, put interventions in place, and initiated the PROMISE (Preventing Recidivism through Opportunities, Mentoring,</p>				

⁴ From Rethinking School Discipline, July 22, 2015.

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		<p>Interventions, Support and Education) program.</p> <p>Revising Code of Student Conduct policy and discipline matrix that require police involvement and to clarify expectations.⁵</p>				
Buffalo		<p>Implement restorative justice practices.⁶</p> <p>Revising agreements between district and school resource officers to lower the number of non-violent misdemeanor arrests for school-based behavior.⁷</p> <p>Implement Student Support Teams and Social-emotional clinics in all schools.⁷</p> <p>Develop a new code of conduct to emphasize intervention over</p>				

⁵ From Rethinking School Discipline, July 22, 2015.

⁶ From Rethinking School Discipline, July 22, 2015.

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		punishment and exclusion. ⁷				
Chicago		Developed the Suspension and Expulsions Plan to reduce out-of-school suspensions, encourage positive school climate, and peer councils to handle discipline issues.				
Cincinnati	M.O.R.E. clubs incentivize good attendance and GPA with field trips and outings.	Set goal of reducing disciplinary incidents by 560 percent through M.O.R.E clubs.			FAFSA completion is built into M.O.R.E. high school clubs.	
Clark County (Las Vegas)	Working collaboratively with City on Downtown Achieves (DA) Schools to expand a successful attendance incentive pilot across on DA schools. The goal of the City and District is a 50% increase in	Monthly data tracking of hard and soft expulsions. District Policy revised to align with State regulations and policies.	AP Goal establishment to target students of color Increase in the number of schools which offer IB programs at elementary, middle, and high schools.	A working group has been established at the State level on how best to address the concerns laid out by a Multicultural Education Bill that passed this past legislative session. The working group will present	Historic Black College and University Tours Affiliations with Fraternal and Sorority programs at schools. Gear Up Partnerships	Implement instructional strategies that are culturally responsible to teaching and assessment practices. Appropriate and tiered interventions at the elementary level.

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	the number of students who miss less than 10 days in DA elementary schools.		Strategic PSAT Indicator Analysis at the 10 th Grade Level to find future AP class enrollees in all subgroups that may not have been previously identified.	potential regulations before the Commission on Professional Standards. The rationale being that if teachers take a multicultural education course during their, they would likely be more effective in reaching their students who come from different backgrounds to increase their learning.		
Cleveland	Launched the “Get to School: You Can Make It” campaign. Partnering with the Cleveland Browns foundation.	Retain Males of Color in school and reduce disproportionate suspension and expulsion rates. Expand use of Planning Centers at each school to reduce suspensions	Increase numbers of Males of Color participating in honors, AP, and G&T classes. Develop new school models open to all.	Adopt curriculum addressing academic, social, and cultural needs of Males of Color in colleges of education.	Increase number of Males of Color who complete the FAFSA. Expand College Now program.	Reduce disproportionate numbers of Males of Color in special education courses. Reduce number of ED classes in

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	<p>Adopt and implement promising and proven approaches to reducing absenteeism.</p> <p>Expand use of Planning Centers at each school to reduce suspensions with attendance liaisons.</p>	<p>with staff trained in de-escalation strategies.</p>				<p>district by 5% in one year.</p>
Columbus	<p>Has developed an Attendance Tool Kit with attendance-related policies and information. Have reduced tardiness and truancy by 76% and suspensions due to tardiness and truancy by 36%.</p> <p>Provide in-school immunizations,</p>	<p>District has implemented Positive Behavior Intervention and Supports (PBIS) and the Student Assistance and Intervention for Learning (SAIL) process in an MTSS framework. Use school counselors and social workers at schools to address social, emotional, and mental health concerns.</p> <p>Has implemented a Truancy Intervention</p>	<p>District is attempting to expand access to gifted and talented programs by tailoring instruction for identified students; provide opportunities for gifted students to work with each other; and enhancing</p>			<p>Are working to increase the number of students with disabilities in inclusive settings, expand co-teaching in regular classroom settings, and ensuring access to the least restrictive environments for students of color.</p> <p>Offering professional</p>

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	<p>school nurses, health screenings, and chronic disease management for students with chronic conditions.</p> <p>Has a District Wellness Initiative for students.</p>	<p>Center and a Positive Alternative Learning for Students (PALS) program along with I-PASS (an alternative to suspension program).</p>	<p>primary grade programs.</p> <p>District has 29 site coordinators who work with teachers on analyzing data and preparing lessons for gifted students.</p> <p>District is piloting a critical thinking program in k-2, a career awareness program, Career Café, for gifted 8th graders, and works on a number of enrichment activities.</p>			<p>development on inclusion, culturally relevant teaching, universal design for learning, racial identity development, and other factors to reduce mis-identification of males of color as disabled.</p>
Dallas			<p>Increased numbers of African-American and Hispanic students taking</p>			

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			<p>AP exams in math & science and numbers scoring 3 or above. (See graphs)</p> <p>Continue expanding NMSI College Readiness Program.</p>			
Dayton	Monitor attendance and discipline data monthly.	<p>Convene stakeholders to review student code of conduct and recommend changes. Have board approve.</p> <p>Research alternative programs to reduce suspensions.</p> <p>Post discipline data on district website and communicate to stakeholders.</p> <p>Restorative justice now implemented in eight schools.</p>	Increase the numbers of students identified as gifted and provide services.		<p>Create baseline for all students completing FAFSA and disaggregate by gender and ethnicity.</p> <p>Participate in country's first "Signing Day" for college acceptance.</p>	
Denver	Implement early warning system and target	Focus on culturally responsive education.	Identify criteria that might qualify students	Implement Strategic Plan for Equity and	Strengthen partnerships with higher education	Implement intentional strategies to

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	<p>resources for immediate intervention. Expand mentoring</p> <p>Increase advisories that match students with caring adults to support social and emotional growth.</p>	<p>Implement restorative justice practices.</p> <p>Goal: Ensure that rates of out-of-school suspensions and expulsions for Black, Latino, and White students are proportionate with population.⁷</p> <p>Goal: All schools will be LTE 3% unduplicated out-of-school suspensions for Black students.⁸</p>	<p>for advanced programs and target recruitment activities in every secondary school.</p> <p>Monitor enrollment by school.</p> <p>Strengthen partnerships with higher education.</p> <p>Increase training and recruitment for teachers with advanced certification.</p>	<p>Inclusion Training and Leadership Development in all schools.</p> <p>Incorporate culturally responsive practices into LEAP teacher professional development and evaluation program.</p>	<p>and pre-collegiate mentoring providers. Establish accountability for FAFSA and post-secondary applications.</p> <p>Start identifying middle-school students.</p>	<p>focus on culturally responsive teaching and assessment practices.</p>
District of Columbia			Working to ensure that AP courses and SAT prep opportunities are equitable and available	Expanding the teacher residency partnership to attract more Males of Color		

⁷ From Rethinking School Leadership, July 22, 2015.

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			throughout the district.	to teach and lead in the district.		
Duval County	<p>Built the Performance Matters data base with an early warning system that includes attendance needs.</p> <p>Attendance plan and policies will identify students with excessive absences for early intervention.</p> <p>Shifting all truancy officers from the district office to school sites to work directly with students and parents.</p> <p>Provide quarterly reports to the board on</p>	<p>Revised student code of conduct to incorporate restorative justice, in-school suspensions, parent conferences, and teacher PD</p> <p>Implementing mental health, positive behavior support, and classroom management training for all teachers and administrators.</p> <p>Early warning system will highlight discipline needs related to suspensions and expulsions, and identify when interventions are needed.</p>	<p>Redesigned the eligibility protocol to gifted programs to expand minority participation.</p> <p>Expanded accelerated courses in every district high school—including AP, IB, AICE, dual enrollment, and industry certification.</p> <p>Saw participation by Black students in accelerated courses increase 42%.</p>	<p>Meeting with local colleges of education on academic, cultural, and social needs of Males of Color</p> <p>Beginning to collect data on effectiveness of teacher college graduates with Males of Color.</p> <p>Expanding “Call Me Mister” program to recruit Black males into teaching.</p> <p>Implementing the Jacksonville Teacher Residency Program to recruit high-performing Males of Color to teach math</p>	<p>Will begin collecting quarterly data on numbers of Males of Color who have completed FAFSA form.</p> <p>Set goals to have District School Counseling Office to increase attendance at Financial Aid Nights at each high school as well as College Goal Sunday held each spring.</p>	<p>Implementing the GRASP Academy for dyslexic students</p> <p>Implementing Tier III reading and math intervention programs in all elementary schools.</p> <p>Electronic data system will allow tracking of academic and behavioral interventions even if they change schools.</p> <p>Will continue gathering data and conducting analysis of data by race on ESE students.</p>

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	attendance and annual reports on achievement gaps.			and science in urban schools.		
Fort Worth	FWISD has established a comprehensive truancy program in collaboration with city resources. Stay in School Coordinators are assigned to each high school feeder pattern to provide outreach support for students with excessive absences. These staff members maintain communication between school and parents and council students with school resources to	The student code of conduct was revised with the following state mandate provision, based on changes from the 84 th legislative session; Before ordering an in-school or out-of-school suspension, placement in a DAEP, or expulsion to JJAEP, the principal or designee must consider: <ol style="list-style-type: none"> 1. whether the student acted in self-defense, 2. the intent or lack of intent at the time the student engaged in the conduct, and 3. the student's disciplinary history, regardless of whether the decision of the principal or designee concerns a mandatory or discretionary action. 	AP and Dual Credit is now a District measure. FWISD monitors the number of AP exams scoring 3 or higher, AP exams taken, AP exam takers, and dual credits received. All of this information is monitored at campus and student group levels. Enrollment in all AP classes is monitored and reviewed for equity. We have added additional counselors at the high school	FWISD has a comprehensive college and career readiness initiative that promotes a college bound and workforce ready culture from elementary to post-secondary opportunities. Primarily at the secondary level, FWISD has GO centers which are college and resource rooms where students can research colleges and careers. FWISD has extensive programming such as College Night which has over 300 college	FWISD has college days, which helps students and parents with college admittance. There is a monthly scholarship bulletin made available district-wide that outlines criteria for scholarships from elementary to college. FWISD has district-wide college financial aid nights hosted at each traditional high school from January through March. In the college and career classes and programming, financial aid	The Special Education department has set up a system of monitoring Special Education referral data by ethnicity on a monthly basis. All schools with a large number of Special Education referrals (particularly with students of color) received cultural responsibility pedagogy and professional learning and training.

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	keep students attending school on a regular basis.		level to support students enrolling in AP opportunities.	representatives present to talk to students.	workshops are given for both parents and students in both English and Spanish. FWISD has strong educational partnerships with every major college and university in the north Texas area that provides peer-to-peer mentoring for college access. FWISD works with UNCF and MACE to help students receive scholarships. UNCF provided over 50% of the scholarships to young men of color.	
Fresno		Implemented restorative practices in several schools in 2013 and				

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		<p>authorized \$500,000 for districtwide strategy.⁸</p> <p>Saw students implement an advocacy group— Students United to Create a Climate of Engagement, Support, and Safety (SUCCESS).⁹</p>				
Hillsborough County	<p>Continue implementing and monitoring the Student Success Program in all targeted middle and high schools with focus on reducing achievement gap, lowering suspensions, increasing attendance, and reducing dropouts.</p>	<p>Initiate and implement Project Prevent grant that will assist 21 high poverty schools break the cycle of violence.</p> <p>Continue and evaluate Project Promise for Title I schools to purchase or support programs to improve discipline and attendance.</p>	<p>Continue successful effort to use PSAT and other data to encourage eligible student of color to participate in AP courses.</p> <p>Expand and monitor the use of AVID with ELLs in grade 6 to prepare them for AP and honors placement.</p>	<p>Continue the partnership with the University of South Florida Urban Residency Program to place and support intern teachers, monitor their impact on student outcomes, and compare their results with other new hires.</p>	<p>Continue the partnership with the Florida HBCU Alliance to increase numbers of students of color who enroll in college.</p> <p>Promote and increase participation in the Black/Brown College Bound program in partnership with Hillsborough</p>	<p>Support MTSS implementation in all schools K-12.</p> <p>Implement and monitor new Project AWARE grant to provide mental health services.</p> <p>Implement new School Climate Transformation grant to improve behavior and climate in 25 Title I schools.</p>

⁸ From Resource Guide for Superintendent Action, July 2015.

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			<p>Continue to use MTSS framework to identify gifted and talented students of color.</p>	<p>Continue the collaboration with area colleges and universities to provide leadership development and “think tanks” around diversity and cultural awareness.</p>	<p>Community College. Strengthen marketing to all high schools and CTE schools of College Goal Sunday, a student and parent workshop geared to increase FAFSA completion rates.</p>	
Houston		<p>Will develop a school-based early-detection and intervention system that connect students and parents to services.</p> <p>Exploring evidence-based practices in intervening to positively impact student behavior without excluding students from school.⁹</p> <p>Developing a districtwide framework that supports positive school environments by</p>				

⁹ From Rethinking School Discipline, July 22, 2015.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		<p>providing teacher and administrators with practical strategies to manage challenging student behavior.¹⁰</p> <p>Providing schools with classroom management tools like <i>The Leader in Me</i> and “Safe and Civil Schools’ Classroom Management” Training.¹⁰</p>				
Indianapolis		<p>Surveying other county schools to learn about alternatives to suspensions and best practices.</p> <p>Reviewing suspension codes to see if the grounds for suspensions can be reduced.</p> <p>Implementing a new Student Code of Conduct designed to increase equity in disciplinary practices.¹¹</p>		<p>Are engaging teacher training at universities in Indiana on culturally responsive instruction and classroom management techniques.</p>		

¹⁰ From Rethinking School Discipline, July 22, 2015.

¹¹ From Rethinking School Discipline, July 22, 2015.

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		<p>Increasing building and district supports to instructionally respond to inappropriate behavior (e.g., restorative practices, PBIS, MTSS).¹¹</p> <p>Working with Marion County Superior Court on conditions under which the court will accept or reject school referrals and arrests for misdemeanor and status offenses.</p> <p>Beginning to coordinate with other community organizations on alternatives to court referrals and other services.</p>				
Jackson						
Kansas City	Have set up truancy intervention efforts to reduce absenteeism with Males of Color, e.g., SEL support, Knock-	<p>Began “No Out of School Suspension Absences” initiative.</p> <p>Eliminating “willful defiance” and insubordination” as grounds for suspension.</p>				

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
	<p>N-Talk, Attendance Ambassadors, Truancy Court, Success Court, letters to parents</p>	<p>PBIS and Behavior Intervention Support Teams</p> <p>Shifting all truant officers into the schools from central office.</p> <p>Regularly report on progress on reducing suspensions and expulsions.</p>				
<p>Long Beach</p>	<p>Continue efforts to encourage and incentive attendance and meeting attendance goals. Currently attendance is 97% districtwide.</p>	<p>Continue and strengthen district efforts to use conflict resolution, early intervention, training in appropriate behaviors, and alternatives to suspensions.</p> <p>Suspensions have dropped over 30%.</p>	<p>District will pay for all but \$5 of AP exam costs in grades 8-12, expand AP test-prep, summer bridge classes, and pre-AP workshops. AP participation increased 20% over last year and 154% over 20 years.</p> <p>Continue Claremont College Long Beach Math</p>			

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
			<p>Initiative by allowing high school students in a summer residential math program.</p> <p>Under-represented students are paired with mentors.</p>			
Los Angeles		<p>Eliminated “willful defiance” as grounds for suspensions.</p> <p>Approved policy to require the use of alternative disciplinary practices such as restorative justice.</p> <p>Continued implementation of PBIS.</p> <p>Goals: Decrease the number of instructional days lost to suspension, decrease suspension rates, and decrease expulsion rate.¹²</p>				

¹² From Rethinking School Discipline, July 22, 2015.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
Louisville	Strengthen Equity Institutes to address disengaged students and teachers. These institutes are led by school officials and local and national experts.	Institute districtwide restorative justice training. Make modifications in the Code of Conduct. Develop equity scorecards Conduct school-level data dives and reports.	Enhance the Advance Program Institute designed to address the non-traditional gifted student. Next cohort is set to be all Males of Color from high-poverty schools	CARDS Program. Partner with University of Louisville and Kentucky State University to design curriculum that focuses on diversity, equity, and inclusion.	Design new dashboard that charts participation in scholarships and FAFSA	Advance Program Sustaining and Improving Initiative
Memphis	Launched the “Represent Everyday” campaign with the Memphis Grizzlies to develop a robo-call to students about attending school.					
Miami-Dade County	Provide hourly case workers to follow up on the truancy referral process with the attendance office for Males of Color.	Implementing the Alternative to Suspension program to reduce suspension and expulsion rates for Males of Color. Plan to eliminate out-of-school suspensions in	Provide data and strategies on programs to increase participation of Males of Color in AP, dual enrollment, AICE, gifted	Partner with local universities to establish curricula, financial aid assistance, and admissions guidance to Males of Color.	Create opportunities for universities and colleges to present information on college readiness, financial aid applications,	Implement a tracking system with multiple levels of review to monitor the placement of Males of Color in special education courses.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		<p>2015-16 school year and instead will send students to Student Success Centers for counseling and social services.¹³</p> <p>Leveraging community partnerships that focus on providing wrap-around services.¹⁴</p>	<p>and talented, CTE, and other programs.</p> <p>Provide information to Males of Color on magnet school opportunities.</p>	<p>Monitor teacher effectiveness with Males of Color using value-added scores.</p>	<p>FAFSA completion, and admissions requirements to Males of Color.</p> <p>Require 12th grade Males of Color to complete FAFSA forms at school computer labs.</p> <p>Meet monthly with school-level student services staff to monitor FAFSA submissions.</p>	
Milwaukee	<p>Partnering with the Milwaukee Bucks to encourage students to attend school every day.</p> <p>Began a new attendance initiative based</p>	<p>Eliminating exclusionary discipline practices. Redefining the circumstances in which discipline practices are applied to students in k-2 grade.</p> <p>Partnering with a variety of nonprofit organizations to reduce</p>	<p>Implemented an AP Initiative grant from the Department of Education to spur the numbers of under-represented students in AP classes. District</p>	<p>Are working with the Urban Teacher Residency Program to increase the numbers of male teachers of color in the district. Also recruiting at HBCUs and</p>		

¹³ StateImpact, July 29, 2015.

¹⁴ From Rethinking School Discipline, July 22, 2015.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
	<p>on PBIS/RTI that trained over 400 staff members. Are using district attendance data to identify and support students with attendance issues.</p>	<p>violence through positive youth development efforts: Milwaukee Christian Center, Running Rebels, and Playworks. Expanding the district's PBIS efforts. Have reduced suspensions from 75,234 in 2008-09 to 16,374 in 2014-15.</p> <p>Are emphasizing social-emotional programming through Project Prevent and expanding restorative justice practices through expanded teacher training.</p>	<p>has doubled the number of students enrolled in AP/IB since 2008. Provided professional development to every AP/IB teacher. Use Springboard for students in grades 6-12.</p>	<p>seeking to reinstate the Metropolitan Multicultural Teacher Education program to recruit male professionals of color into teacher careers.</p> <p>Expanding Culturally Responsive/Relevant Teaching (CRT) practices.</p> <p>Introducing a series of professional development sessions for principals and assistant principals called the Continuum of Cultural Proficiency.</p>		
Minneapolis		<p>Revamping discipline policies based on suspension data with</p>				<p>Conducting a program audit to determine over-</p>

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		<p>new emphasis on interventions, restorative justice, and SEL.</p>				<p>identification in SPED.</p>
<p>New York City</p>		<p>Expand the use of restorative approaches instead of exclusionary discipline.¹⁵</p> <p>Promote a multi-tiered approach to promoting positive behavior.¹⁴</p> <p>Reduce reliance on suspensions and calls to EMS for behavioral incidents.¹⁴</p>				
<p>Oakland</p>		<p>Community schools strategy.¹⁶</p> <p>New district discipline policy to end willful defiance as grounds for suspensions.¹⁵</p> <p>Restorative justice and trauma-informed services.¹⁵</p>				

¹⁵ From Rethinking School Discipline, July 22, 2015.

¹⁶ From Rethinking School Discipline, July 22, 2015.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		<p>Culturally responsive positive behavior interventions and supports.¹⁵</p> <p>Culturally specific approaches for African American males, Latino males, and females of color.¹⁵</p> <p>Social Emotional Learning.¹⁵</p> <p>Student leadership/student voice (all city council, wellness council, AAMA youth council).¹⁵</p>				
Oklahoma City						
Orange County	<p>Convened a committee to study attendance of students who were chronically absent.</p>	<p>Researched the suspension rates of all students and determined schools with most racially disproportionate suspensions and expulsions.</p>	<p>Prepared a breakdown by race and gender of all honors and AP courses.</p> <p>Convened a high-level staff</p>	<p>Initiated a relationship among three local colleges of education around the Males of Color initiative.</p>	<p>Work with guidance offices and directors to develop a protocol to report on progress of Males of Color who complete the FAFSA process.</p>	<p>Review data on the percentages of Males of Color and other subgroups identified in ESE programs.</p>

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
	<p>Established monitoring procedures to routinely evaluate student attendance and intervene before students become chronically absent.</p> <p>Create a multi-pronged prevention and intervention system to decrease absenteeism</p> <p>Establish incentives for good or perfect attendance.</p> <p>Meet with teams of social workers to establish individualized intervention</p>	<p>Held meetings with administrators from these schools along with area administrators.</p> <p>Meet with selected schools on a monthly basis to review data, refine discipline procedures with students of color, and share effective strategies.</p> <p>Provide training to all administrators on how to analyze disaggregated data, use best practices, and motivate good behavior.</p> <p>Set up a Behavior Leaders Consortia in 11 high schools and 17 middle schools</p> <p>Restorative justice.¹⁷</p> <p>Positive Alternatives to School Suspension (PASS).¹⁶</p>	<p>meeting to develop stronger procedures for reporting participation in advanced courses by Males of Color. Involved principals in the discussions.</p> <p>Continue the second-grade universal screening process designed to capture more students of color.</p> <p>Presented plans to area superintendents and principals.</p> <p>Monitoring progress of efforts.</p>	<p>Set up discussions about strengthening pipeline of minority teacher candidates. Exploring the development of a local “Call Me Mister” program. Exploring the development of a curriculum at local colleges of education that addresses the academic, cultural, and social needs of Males of Color.</p> <p>Meet with local colleges of education to develop a data monitoring system on how teachers perform</p>	<p>Meet with parent groups on the importance of the FAFSA forms. Schedule annual meetings for parents of students who are in junior class.</p> <p>Meet with sponsors of the Minority Leadership Scholars to increase the numbers of Males of Color who complete FAFSA.</p> <p>Monitor effects of the effort and make adjustments.</p>	<p>Meet with senior leadership team to discuss disproportionality and assign personnel to monitor and coordinate efforts.</p> <p>Review cases of students who may have been improperly identified.</p> <p>Assign staff to monitor efforts to reduce disproportionality</p> <p>Track progress of efforts.</p>

¹⁷ From Rethinking School Discipline, July 22, 2015.

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	<p>systems for students whose attendance does not improve.</p> <p>Monitor and evaluate intervention systems for effectiveness.</p> <p>Monitor students who are chronically absent.</p>	<p>Alternatives to Suspension Centers.¹⁶</p>		<p>with Males of Color.</p> <p>Monitor program progress.</p>		
Palm Beach		<p>Implemented restorative Justice practices in Title schools. Revised Code of Conduct Policy and discipline matrix. Work with School Police to reduce the number of campus arrests. Active youth Court program. Implemented SwPBS in all schools in the District.</p>	<p>Increased Boys of Color participation in AP classes by using the AP Potential.</p> <p>Started a new IB Program in Majority Hispanic School with an aggressive recruitment of Boys of Color.</p>		<p>We have required all high school students to participate in FAFSA workshops facilitated by school guidance counselors. At our Title I schools the graduation coach ensures that all males of color complete the FAFSA form.</p>	<p>Multi-Tiered Support Systems (MTSS) implementation in all school, K-12. Review data on percentage of males of color identified in ESE programs. Assigned staff to monitor efforts to reduce disproportionality .</p>

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
			<p>Creating new Gifted cluster sites at majority minority schools to increase access for Boys of Color.</p>			
Philadelphia	<p>Analyzed data on the link between attendance and dropping out, state test scores, and graduation</p> <p>Created attendance awareness campaign focused on the 50% of students who miss the most days. Target communication s to parents and guardians about importance of</p>	<p>Develop a structure to support climate transformation.</p> <p>Promote fair and effective disciplinary practices.</p> <p>Develop multi-tiered behavior framework in 14 existing schools and 28 new schools.</p> <p>Collaborate with state and national partners to promote a system of change and improvement.</p> <p>Eliminating zero tolerance policies.¹⁸</p>				

¹⁸ From Rethinking School Discipline, July 22, 2015.

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	school attendance.	School Climate Transformation Grant. ¹⁷ School Diversion Program. ¹⁷ Trauma-informed schools. ¹⁷				
Pittsburgh		Implementing restorative justice practices in 23 schools, designed to enhance relationships between students, staff, and parents to improve student behavior and reduce incidents.				
Portland	Continue participating in Attendance Matters with All Hands Raised partners SUN, Department of Human Services—providing onsite social workers.	Goal to reduce overall exclusionary discipline by 50% and reduce disproportionately in exclusionary discipline by 50% in two years. ¹⁹ Integration of PBIS, restorative practices, and collaborative action research for equity. ¹⁸	Continue Advanced Scholars program at Franklin that targets students of color to take at least 4 AP classes—has increased graduation rate and college-going rate.	Continue partnership with Portland Teacher Project, Portland Community College, and Portland State University to recruit and prepare culturally responsive	Have GEAR UP and AVID participants complete FAFSA. Have counselors at schools not participating in GEAR UP or AVID provide needed support to Black and Latino	Will align service delivery model with National Association of School Psychologists' 10 domains of practice, which shifts focus to prevention and culturally response interventions

¹⁹ From Rethinking School Discipline, July 22, 2015.

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	<p>Establishing attendance protocols and attendance toolkit with training on their use.</p> <p>Expanding attendance efforts to entire Roosevelt Cluster and beyond. Have hired attendance data analysts.</p> <p>Have created Student Attendance Response Teams to identify and support students who attend school less than 90 percent of the time.</p>	<p>Revising Student Handbook to reflect restorative practices.¹⁸</p> <p>Restructuring expulsion hearing process.¹⁸</p> <p>Targeted school-based culturally specific services.¹⁸</p> <p>CARE teams to improve school climate.</p> <p>Providing culturally specific Student Assistance Coordinators to support males of color in pilot schools.</p> <p>Provide mentorships through Coalition of Black Men, Latino Network, and Indian Education.</p> <p>Establish Parent College to support disciplinary efforts of Latino parents.</p> <p>Partnering with Portland Parent Union and Community Education</p>	<p>Expand over time.</p> <p>Continue partnership between Portland Community College and Jefferson Middle School on dual high school/college credits.</p> <p>Partner with local universities on scholarships beyond community college.</p> <p>Expanding dual credit opportunities, AP, and IB in all high schools. Asking each high school to set targets for recruiting</p>	<p>teachers and to increase diversity of teacher pool.</p> <p>Continue Portland Metro Education Partnership, which includes 10 teacher preparation programs to improve pre-service and in-service teacher training.</p> <p>Use Master Teachers with strong culturally responsive practices to co-teach with student teachers.</p>	<p>males in completing FAFSA.</p> <p>Collecting data monthly on numbers of Males of Color who have completed FAFSA form (through All Hands raised program).</p>	<p>prior to special education placement.</p> <p>Pilot “blind panel” for special education eligibility screening.</p>

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		<p>Partners to identify areas where suspension moratoria are viable (e.g., pk-2, subjective offenses) and establish restorative justice practices.</p> <p>Pilot “blind hearing” concept for disciplinary hearings.</p> <p>Restructuring expulsion hearing process.</p>	<p>Black and Latino males into programs.</p> <p>Expand AVID to more high schools and their middle schools and partner with University Partners to expand pool of AVID tutors.</p> <p>Collaborate with higher education partners to develop honors courses that focus on African American, Latino and indigenous cultures.</p> <p>For non-AVID students, created college and career</p>			

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
			preparation classes at the 9 th grade.			
Providence	<p>Improve data collection on student attendance.</p> <p>Target attendance strategies first on students in grades k to 3.</p> <p>Enlist community partners like city and county government, the United Way, and others to make home visits to residences of chronically absent students.</p> <p>Focus the work of parent liaisons at each school on attendance.</p>	<p>Conduct a thorough examination of the Student Discipline and Code of Conduct to ensure that policies are fair and equitable.</p> <p>Begin phasing in more restorative justice practices rather than out-of-school suspensions.</p> <p>Work with the Providence Police on the role and authority of School Resource Officers to curtail student involvement with law enforcement.</p> <p>Provide professional development on applying restorative justice and conflict resolution.</p>	<p>Set targets and goals for increased participation of Males of Color in AP courses</p> <p>Expand the number of middle school students the district works with to prepare them for AP in high school.</p>			

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
	Continue community impact campaign linking attendance and poor achievement.					
Rochester		<p>Developed a community task force on student behavior that was convened by the Rochester Area Community Foundation and is focused revamping the district's code of conduct and will track progress.</p> <p>Expanded positive engagement activities (e.g., art, music, sports, extra-curricular activity.)²⁰</p> <p>Expanded learning time in 22 schools.¹⁹</p>				<p>Continue expanding the continuum of services for students with disabilities to reduce over-classifications and improve LRE placements.</p> <p>Expand use of consulting teachers in general education classes.</p> <p>Expand language enrichment and intervention efforts with young students to reduce</p>

²⁰ From Rethinking School Discipline, July 22, 2015.

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
						<p>inappropriate placements in speech and language impairment.</p> <p>Expand use of IDEA funding for reading intervention programs.</p>
Sacramento	<p>Chronic Absenteeism Task Force is working to reduce chronic absenteeism by implementing interventions, providing professional development and build capacity.</p>	<p>Adopted Whole Child Resolution in 2014 that addressed achievement gap and disproportionality in discipline.</p> <p>Revised School Climate Policy and School Discipline to address racial disproportionality and inequitable disciplinary practices.</p> <p>Cohorts of schools received training in Restorative practices and equity frameworks and Positive Behavior Intervention and Supports.</p>	<p>Developed a new GATE identification process including universal screening in grade 1 and 3 and follow up assessments in grades 2 and 4 and expanded parent engagement process</p>	<p>Sacramento Pathways to Success continues to deepen relationship between SCUSD, Sacramento City College and Sacramento State University in order to help students transition to, and succeed in, college.</p> <p>Culturally relevant college tours conducted</p>	<p>Culturally relevant Supplemental providers and Youth Development staff support boys of color, foster youth and Men’s Leadership Academy students with FAFSA participation.</p>	<p>Addressed Special education over identification specific to ED through expansion of programs such as Positive Behavioral Interventions and Support (PBIS), Restorative Practices, and Social Emotional Learning (SEL).</p>

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		<p>Identified 3 Restorative Practice demonstration sites</p> <p>Men’s Leadership Academy youth continue to participate in statewide Zero Tolerance policy advocacy.</p>		<p>by SCUSD staff and community providers.</p> <p>Expanded Learning programs offer opportunities to cultural brokers/community providers to offer culturally relevant programming, mentoring, and leadership/internship opportunities during after school space.</p>		
San Francisco		<p>Implemented a districtwide professional development program in 2009 on implementing restorative justice practices. Built the approach into the teacher contract. Saw suspensions drop from</p>				

City School System	Addressed chronic absenteeism (4)	Revised Suspension and Discipline Policies (5)	Expanded AP and gifted/talented programs (6)	Spurring Colleges of Education (7)	Expanding FAFSA (8)	Addressed SPED Over-identification (9)
		3,098 in 2009-10 to 1,921 in 2012-13. ²¹				
Toledo	Started the Truancy Prevention Program PBIS Pathways to Success.	Initiating PBIS and SEL programs	Expanding AVID, gifted and talented, & AP courses EHSO		Naviance Graduation coaches	EHS

²¹ From Resource Guide for Superintendent Action, July 2015.

Males of Color Initiatives in the Great City Schools (continued 3)

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
Anchorage	Provide college and career guides at three high schools; expand freshman houses, academies, and small learning communities to personalize attention on students at risk; continue SEL programs; and focus professional development on student engagement.	Provide parent engagement training and parent meetings with focus on under-served populations. Conduct regular ELL parent meetings and classes for refugee parents. Continue soliciting concerns from Alaska Native and American Indian community groups	Collaborate with broad range of community organizations, e.g., MECAC, NAC, Title I family groups, ARISE, United Way, Big Brothers-Big Sisters, CITC, UAA, and others.			
Atlanta	Create at-risk indicators for					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>dropping out that would be used to determine student case-loads for graduation coaches.</p> <p>BEST Academy is used for a supportive single-gender environment serving mostly African American males.</p> <p>Currently developing an African American male support initiative for high schools</p> <p>Continue partnerships with Brothers Building Up Brothers, Dukes</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	Foundation, and 100 Black Men.					
Austin	<p>Worked to reduce the number of male drop outs.</p> <p>Altered approach to discretionary removals at each campus.</p> <p>Plan Students with a Graduation Goal (SWAGG) Conference— with male component.</p>	<p>Re-established programs that give books to families.</p> <p>Held Vertical Team Parent Focus Groups with African American parents.</p> <p>African American Parent Engagement Conference in April 2015</p>	<p>Providing cultural sensitivity training and training on differing learning styles for all staff.</p> <p>Partner with University of Texas Department of Diversity and Community Engagement.</p> <p>Speaker series for administrators on reaching Males of Color; book studies; on-line professional development with Jawanza Kunjufu and Robin Jackson.</p> <p>Power of One Institutes</p>			
Baltimore	Engage students in activities that will define their future selves while receiving		Will hold a conversation about race, Black male identity development and			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>supports. (Mentor match, college visits, college planning, SAT prep.)</p>		<p>support on MLK birthday. Expand into monthly discussions</p>			
Boston	<p>Mayor’s Office is partnering with the Mass Mentoring Partnership with the goal of recruiting 1,000 mentors to work with young people.</p> <p>Mayor has opened an office of financial empowerment to increase job opportunities for young people and other goals</p> <p>Mayor has expanded the number of summer jobs available to</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>young people—10,187 in 2014—and expanded the MLK Scholars Program.</p> <p>Graduation rate among all African American students in the district has increased from 54.2 percent in 2007 to 64.5 percent in 2014.</p> <p>Graduate rate among ELLs in the district has increased from 51.9 percent in 2013 to 59.3 percent in 2014.</p>					
Broward County	Started the “Mentoring Tomorrow’s Leaders” peer-to-peer program for minority					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>males in two high schools in partnership with Broward College.</p> <p>Provide peer mentoring, leadership support, and dropout prevention efforts to help students transition to college or workforce.</p>					
Cincinnati	<p>M.O.R.E. programs in high schools focus on academic success, career readiness, building a resume, FAFSA, college requirements, college visits, preparing for SAT and ACT,</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	public book studies, speaking, and health and wellness.					
Clark County (Las Vegas)	<p>Lowest performing high schools placed in Turnaround Zone to receive “triage” to increase graduation rates by allowing schools flexibility in scheduling, resources, hiring, and curriculum.</p> <p>Star On Programs.</p> <p>Community Resource Advocates</p> <p>New Heights Intervention Program</p>	<p>Parent Engagement Centers located geographically across the District.</p> <p>Newly-Created Family Engagement Department.</p>	<p>Cultural Competency Training for Administrators with ongoing PD</p> <p>Case Study Learning/Bennett Model</p> <p>Look Fors and Instructional Rounds</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>JAG</p> <p>Community Role Models Guest Speaking.</p> <p>On-site mentoring</p> <p>Peer Mediation</p> <p>In-house Academic Center Placements.</p> <p>Graduation Advocates provided by the School Partnership Office</p>					
Cleveland	Transform high schools with low graduation rates. (100 mentors matched with 100 mentees)	Provide literacy and engagement initiatives with parents.	Engage in broader discussion and examination of how issues of race, language, and culture affect the work of the district.			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
		<p>Expand use of parent/teacher conference days, Father’s Walks, Parent University, and Student Advisory Councils.</p> <p>Improve cultural proficiency of IEP teams.</p>				
Columbus	<p>District has rich portfolio of activities to engage middle and high school students in athletics, performing arts, career and technical education, and academics to spur attendance and engagement despite budget cuts.</p>	<p>Implemented Parent Literacy Academies to help parents work on literacy with their children at home.</p> <p>Have parent consultants at 40 schools to improve parent engagement.</p>				

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>District is expanding career and technical offerings at Career Centers and neighborhood schools, apprenticeships, and internships</p> <p>District is implementing a number of initiatives focused on character development, e.g., “Boys Won’t Be Boys,” REAL Young Men, ELITE, Young Leaders of Today and Tomorrow, and I-Men.</p>					
Dallas						

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
Dayton	<p>Monitor grade distribution in grades 7-12.</p> <p>Monitor course enrollment in AP, IB, 8th grade algebra, special education, CTE courses each semester and annually.</p> <p>Monitor graduation rates.</p>					
Denver	<p>Increase multiple pathways to graduation.</p> <p>Promote innovations in competency-based credit and credit-recovery programs.</p> <p>Increase CTE offerings.</p> <p>Monitor students not on</p>	<p>Prepare materials and outreach strategies to help families understand trajectories to college and careers—and what students need to be ready.</p> <p>Conduct outreach to families on common</p>	<p>Implement Strategic Plan for Equity and Inclusion Training and Leadership Development in all schools, including student voice.</p> <p>Increase leadership opportunities, particularly for students not typically engaged.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>track at every grade level from 4th through high school</p> <p>Increase student voice in policy program implementation.</p>	<p>core, and career readiness opportunities.</p> <p>Expand teacher home visits.</p> <p>Connect school performance framework with family practices.</p> <p>Expand birth to three initiative to more school clusters.</p> <p>Partner with community to increase family supports.</p>	<p>Implement Black Male Achievement Initiative (BMAI)</p>			
District of Columbia	<p>Establishing an all-male high school in DC to spur academic success of Males of Color.</p>	<p>.</p>				

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Establishing “Championing Academic Success” modeled after college football signing day to celebrate each graduate’s next steps toward college or career training.</p>					
Duval County	<p>Have launched the “5000 Role Models of Excellence Project” to improve academic achievement among males of color. District is recruiting 500 local businesses and community leaders to serve as role models to 500 African American boys</p>	<p>Are implementing Parent Academy Courses promoting literacy and parent engagement for families of color</p>	<p>Are requiring all district and school-based administrators to participate in cultural sensitivity training.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>in 10 middle and high schools.</p> <p>Have placed graduation coaches in all Title I schools and now require all counselors in schools without graduation coaches to attend regular meetings on how to ensure that all students graduate.</p>					
Fort Worth	<p>Developed District Focus Goals at all campuses to address matriculation rates but specifically at high schools for 1st year Freshmen.</p>	<p>Family Communication Liaisons identify needs on every campus. Parenting classes organized by pyramids. "Strong Fathers Strong Families"</p>	<p>Began training for administrators in "Courageous Conversations about Race" with a follow-up plan to expand into campuses in 2015.</p> <p>Began Racial Equity Conversations in school feeder patterns</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>District Level Targets identified and monitored to increase student achievement on state assessments and increase graduation rates.</p>	<p>model used. Parents as Teachers Liaisons at every elementary campus. “Ready Rosie” early childhood modeling program used. Social media used to connect with families (Facebook, Twitter, Instagram, Vine, Pinterest, as well as a FWISD App). Parent Link and Parent Portal used to communicate with parents. Morningside Children’s Project and</p>	<p>experiencing most opportunity for growth.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
		Historic Stop Six Projects. SMART goals written with data and assessments planned as well as connected to other programs.				
Hillsborough County	Launch the Gear-up Grant to increase the performance of secondary and post-secondary students, increase graduation rates, and improve family knowledge of post-secondary opportunities.	Host and monitor Parent University, a districtwide initiative held four times a year to better engage parents, provide health information, and conduct workshops.				

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
		<p>Expand district parent nights for Hispanic families to inform parents about the educational and post-secondary process. Nine planned this year.</p>				
Houston	<p>Will develop policies and practices around an early warning and response system that include whole-child indicators and interventions, focused on reducing chronic absenteeism and exclusionary discipline.</p>	<p>Will facilitate parental participation by providing caregivers tools to support their children's academic and developmental progress and identify resources to meeting psycho-social and</p>				

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Will develop an evidence-based list of interventions to improve school environments that will better prepare students for college and career.</p> <p>Will partner with community-based organizations and businesses to increase experiential learning for student academic success.</p> <p>Increase the number of high school students of color who have access to college preparation</p>	development needs				

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>services, counselors, and financial aid.</p> <p>Will expand and align career and technical education training received by young men of color with local growth industries.</p> <p>Will increase the numbers of mentorships, coaching opportunities, and other support services for young men of color.</p>					
Indianapolis			Working with IBE and Mind Trust on community conversations about how to address the needs			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
			<p>of educators as they balance the educational, social, and emotional needs of African American males.</p> <p>Participate in a summer IBE conference on cultural competencies.</p>			
Jackson						
Kansas City						
Long Beach	<p>Continue high school reforms and improvements that have led to overall graduation rates of 80.6 districtwide, including 79.1% for African American students and 76.6% for Hispanic students.</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Working to replicate the California Academy of Math and Science, a nationally ranked “beating the odds” school.</p> <p>Expand the district’s high school summer school initiative that included 7,000 students last year. Focuses on math prep, bridge classes, credit recovery, and other efforts.</p>					
Los Angeles						
Louisville	<p>Ensure that Equity Scorecards itemize college and career readiness rates</p>		<p>Student voices and interviews with a cohort of Males of Color.</p> <p>Community conversations</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>for all groups in every school.</p> <p>ACT boot camps for Males of Color.</p>		<p>using district studios.</p> <p>Districtwide book studies centered on race, culture, bias, and males of Color.</p> <p>Develop Equity Council.</p>			
Miami-Dade County	Place graduation coaches in high schools with persistently low rates of graduation among Males of Color.		Initiate meetings with community groups, universities and colleges, municipalities, advisory groups, civil service organizations, agencies, and others to examine ways to provide greater equity, access, and diversity in educational opportunities for Males of Color.			
Milwaukee	Initiated the “Gaining Early Awareness Readiness for					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Undergraduate Program” (GEAR UP) in eight high schools to work with 10th and 11th grade students on academic advising, tutoring, high school transition support, and college tours.</p> <p>GEAR UP program also working with AP to ensure eligible students enroll in AP courses.</p> <p>Continue support for two citywide College Access Centers that serve all high school students.</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Making available to all 11th grade students testing on the PSAT to provide more access to National Merit Scholarships.</p> <p>Expanding dual enrollment classes in conjunction with Milwaukee Area Technical College (MATC).</p> <p>Expanding career and technical education programs (M3 program).</p> <p>Created the MATC Promise program that provides no-cost education to</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Milwaukee high school graduates.</p> <p>Implemented the Passport to Adulthood program to prepare young people to enter the workforce, earn money, and gain experience.</p> <p>Working with the community to provide job internships and employment opportunities for students: Milwaukee Area Workforce Investment Board, Career Cruising, ccSpark, Inspire Southeast Wisconsin, and GPS Education Partners.</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
Minneapolis		<p>Developing a Parent University starting with families of students taking the BLACK course. Focus for parents will be on understanding and navigating the school system, engaging in school culture and teacher success, collaboration with school, student success at home and school, social and emotional learning, college readiness, and advocacy.</p>	<p>Established a Collaborative Action Research Cohort (CARC) to project sites focusing initially on the book Pedagogy of Confidence that is built into professional development time.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
Oklahoma City						
Orange County	<p>Review district data on graduation rates among Males of Color.</p> <p>Devise a plan for addressing findings from data review with area superintendents and guidance staff.</p> <p>Meet with staff of schools where Males of Color are not graduating and plan parent meetings.</p> <p>Monitor course passage rates among Males of Color in schools with low graduation rates.</p>	<p>Meet with sponsors of Minority Leadership Scholars and discuss roles they can play with parents.</p> <p>Meet with parents in high schools where graduation rates are not high to encourage student achievement.</p>	<p>Research professional development that is effective in raising awareness of issues.</p> <p>Met with consultant to determine appropriate culturally responsive training for teachers who contribute to high suspension rates.</p> <p>Determined which teachers needed training and began the Behavioral Leaders Consortium.</p> <p>Begin training on Culturally Responsive Instruction for administrators, principals, deans,</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>Monitor school efforts and actions when informed of data.</p> <p>Established an acceleration initiative in Algebra I in 19 high schools.</p> <p>Setting up the Minority Leadership Scholars program and the Ethnic Minority Enrichment in Research and Graduate Education.</p>		<p>counselors and selected teachers.</p> <p>Monitor effects and progress.</p>			
Palm Beach	<p>Have placed graduation coaches in all Title I high schools. The District also sponsors every student to take the SAT in the 10th grade at no</p>	<p>We have created an office of Parent and Community Engagement. We are working on plans to launch a</p>	<p>All senior District leadership and a majority of high school principals have gone through the Undoing Racism training levels 1 & 2. We have also begun “Courageous</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>cost to the student. We have a Superintendent’s Graduation Task Force to increase graduation and decrease suspensions of African American males.</p>	<p>District-wide Parent Academy.</p>	<p>Conversations” meetings with key District staff and stakeholders. Complete the data analysis portion of an equity audit done by leading expert, Pedro Noguera.</p>			
Philadelphia	<p>Work with City Year in high-needs high schools on individualized English and math tutoring, attendance, and behavior.</p> <p>Focusing on students with attendance below 90%, more than one out-of-school suspension, and an F grade in math or English.</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
Portland	<p>(See items under advanced placement.)</p> <p>Expanding career and technical offerings at career centers.</p> <p>Expanding academic engagement through athletics.</p>	<p>Continue offering family learning events through the Office of School and Family Partnerships.</p> <p>Partner with Black Parent Initiative and 8 other community partners on third-grade reading initiative.</p> <p>Offer Parent University classes through the Black parent Initiative.</p>	<p>Board passed Racial Educational Equity Policy and developed five-year plan for implementation.</p> <p>Continue partnership with Pacific Educational Group around Courageous Conversations.</p> <p>Continue “Courageous Conversations about Race” diversity training with school board, executive leadership, building leadership, teachers, classified staff, bus drivers, and custodians. Have started with parents as well.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
			<p>Named “Equity Teams” that is responsible for ongoing professional development around equity at every school and central office department.</p> <p>Named CARE teams (Collaborative Action Research for Equity) teams at pilot sites that will be expanded to all schools in order to strengthen culturally responsive teaching practices.</p> <p>Developed and implemented an “Equity Formula” for staffing and differentiated resource</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
			<p>allocations by student subgroup. Using “Equity Lens” tool for school board and central office decision making.</p> <p>School board approved an “Equity in Public Purchasing and Contracting” policy that includes a provision for contractors to engage students in internships.</p> <p>School board passed a revised “Affirmative Action” policy with the goal of recruiting and hiring staff that better reflects demographics of student body.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
			<p>Continue hosting monthly films/lectures/panel discussions on race and culture for staff, parents, and community.</p> <p>Partner with City Club to engage broader audience in “Courageous Conversations.”</p>			
Providence	Continue expanding CTE opportunities to district middle and high schools.		<p>Engage a broad community discussion and examination of how issues of race, language, and culture affect the work of the district. Will use town hall forums and public hearings.</p> <p>Name a working group of adult men of color to serve as an advisory group to the district.</p>			

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
Rochester	<p>Continue expanding sports programs to better engage Males of Color.</p> <p>Increase the number of offerings in art, music, band, physical education, and other extra-curricular activities.</p> <p>Continue the district’s Latin America Literature elective along with the current African American program.</p> <p>Considering a “Males in Mind” science fiction course in English to</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>engage Males of Color.</p> <p>Expand credit recovery.</p> <p>Expand paying CTE costs for students in cooperative educational service course.</p> <p>Expand the P-TECH Rochester program preparing students for computer technology jobs along with providing mentors, work experience, and college credit.</p> <p>Continue the Leadership Academy for Young Men, a single-gender</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>high school with grades 7-12 that focuses on discipline, respect, and academics.</p> <p>Continue All City High, which provides alternative paths to graduation in a non-traditional setting.</p>					
San Francisco	<p>Have launched the African American Postsecondary Pathway (AAPP) program that connects all graduating African American 12th graders to a postsecondary support system. Partnering with Beyond 12 to connect all</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	<p>African American seniors, provide coaching and mentors, and provide B12 MyCoach mobile apps to keep students informed about specific postsecondary education deadlines and resources.</p> <p>LinkedIn has provided profiles and workshops on career goals.</p> <p>Partnered with local Chamber of Commerce on summer jobs and career opportunities, and partnered with Salesforce to provide 45</p>					

City School System	Transform Low-performing high schools and spur graduation rates (10a)	Started Parent Training and Engagement (10b)	Discussions about Race (11)			
	internships that will be expanded to 150.					
Toledo	Turnarounds, RttT, and SIG		Bridges out of Poverty Forums on Racism			

DRAFT

PROFESSIONAL DEVELOPMENT TASK FORCE

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Professional Development

2015-2016

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

Darienne Driver, Milwaukee Superintendent
Felton Williams, Long Beach School Board
Deborah Shanley, Brooklyn College CUNY

**ENGLISH LANGUAGE LEARNERS AND BILINGUAL
EDUCATION TASK FORCE**

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on English Language Learners and Bilingual Education

2015-2016

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 Chair

Valeria Silva, St. Paul Superintendent

**ONLINE PROFESSIONAL DEVELOPMENT
PROJECT**



MEMBER DISTRICTS

- Albuquerque
- Anchorage
- Arlington, TX
- Atlanta
- Austin
- Baltimore
- Birmingham
- Boston
- Bridgeport
- Broward County
- Buffalo
- Charleston County
- Charlotte-Mecklenburg
- Chicago
- Cincinnati
- Clark County
- Cleveland
- Columbus
- Dallas
- Dayton
- Denver
- Des Moines
- Detroit
- Duval County
- El Paso
- Fort Worth
- Fresno
- Guilford County
- Hillsborough County
- Honolulu
- Houston
- Indianapolis
- Jackson
- Jefferson County, KY
- Kansas City
- Long Beach
- Los Angeles
- Miami-Dade County
- Milwaukee
- Minneapolis
- Nashville
- New Orleans
- New York City
- Newark
- Norfolk
- Oakland
- Oklahoma City
- Omaha
- Orange County, FL
- Palm Beach County
- Philadelphia
- Pittsburgh
- Portland
- Providence
- Richmond
- Rochester
- Sacramento
- San Antonio
- San Diego
- San Francisco
- Santa Ana
- Seattle
- Shelby County
- St. Louis
- St. Paul
- Toledo
- Washington, D.C.
- Wichita

Dear [REPRESENTATIVE AT COMPANY]

The mission of the Council of the Great City Schools (CGCS) is “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”. As part of this mission, CGCS spearheads efforts to boost academic performance among its membership, which includes 70 of the nation’s largest urban school districts.

CGCS was recently awarded a grant to build an online professional development (PD) tool that will be accessible to a potential audience of some 400,000 urban educators. This online tool is intended to support educators who are teaching high-needs students, including English language learners (ELLs), students performing below grade level, or those who may be economically disadvantaged.

With the advent of new, more rigorous standards, there is a major unmet need for high-quality, flexible, customizable professional development tools that will support educators in building their own capacity to teach high-needs students effectively. We know that the existing universe of online Common Core-related professional development is extensive, but we intend on developing an innovative offering that will be unlike any other PD program available. Please see the attached Request for Proposals (RFP) for details.

We are seeking a partner in the development of this innovative online platform, and we’d invite [YOUR COMPANY] to submit a proposal to be part of this important work.

Please review the RFP and, if interested in this collaboration, please submit your proposal by no later than 12:00 PM EST on Monday, 3/14. We will be reviewing responses immediately thereafter and will be in touch with our decision by the end of the month. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Michael Casserly".

Michael Casserly
Executive Director

The Council of the Great City Schools

A Request
for Proposals:

For a
Professional Development Platform

For Teachers of High-Needs Students
in
Urban Schools

Table of Contents

[About CGCS](#)

[The Rules of the Road](#)

[The Council's Pedagogical Philosophy](#)

[The Council's Built-in Market](#)

[Target Audiences](#)

[Attributes of the PD Platform](#)

[Content Development](#)

[The Importance of Content Organization and Formats](#)

[Lesson Cycle Description & Requirements](#)

[Platform Descriptions and Roles](#)

[Some High-Level System/Technical Guidelines](#)

[Development Timeline](#)

[Major launch dates:](#)

[Content development dates.](#)

[Simple Gantt Chart](#)

[The "Ask" & How to Respond](#)

[Responding to this RFP](#)

[Closing](#)

About CGCS

The mission of the Council of the Great City Schools (CGCS) is 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. As part of this mission, CGCS spearheads efforts to boost academic performance among its membership--70 of the nation's largest urban school districts. To that end, CGCS has recently been awarded a grant to build an online professional development (PD) tool that will be made available to up to 400,000 urban educators. This online tool is intended to support educators who are teaching high-needs students, including English language learners (ELLs), students performing below grade level, and those who are economically disadvantaged.

With this RFP, the Council is looking for a *partner* to help us develop a technology-based platform that could disseminate this important work to urban educators nationwide.

The Rules of the Road

CGCS is a nonprofit organization that supports urban school districts that serve some of the nation's most diverse children. The organization has decades of experience collaborating with our member districts and national experts to co-design resources, such as the one described in this document, to help improve the academic outcomes of our urban schoolchildren.

This RFP--and the documents emerging from our six-month planning process--are the intellectual property of the Council of the Great City Schools. They should be shared only within the smallest circle of staff who need to directly contribute to the requested proposal. If you cannot agree to this request, please destroy this document now and let us know that you won't be proceeding with a proposal.

The Council's Pedagogical Philosophy

CGCS has a strong tradition of supporting the professional growth of its member urban educators. We believe that effective professional development is informed by research, is interactive, job-embedded, and reflective. Therefore, a critical element of our ongoing professional development efforts involves expertise from two key sources: the counsel of leading university professors and researchers, who help identify and apply the latest research and best practices, and urban

practitioners, who anchor our work in the practical realities of today's urban classrooms. Our *Framework for Raising Expectations and Instructional Rigor for English Language Learners*, is an example of work produced by the Council that is informed by both groups and that is now widely used as a resource in urban school districts across the country. We are looking for a vendor or partner that can help leverage this pedagogical tradition and translate it into a new web-based professional development tool.

The Council's Built-in Market

The Council undertook a six-month planning period to better understand the issues that our urban school constituents face. The result was the development of this on-line PD concept. We are convinced that this PD platform can address the needs of our network of urban educators, who work in 70 of the nation's largest school districts. These educators teach and support large and concentrated populations of English Language Learners (ELLs) and other high-needs students, who are at profound risk of being left behind if they are not exposed to rigorous, grade-level texts, content, and academic conversation. We envision teaching educators how to work with high-needs students in a way that leverages students' strengths, while addressing their unfinished learning and developing their English-language skills.

Through this project, we hope to encourage a paradigm shift from a reliance on remedial work, slowed-down instruction, isolated vocabulary-based instruction, and watered-down materials to practice that uses the academic assets and skills of these students in order to bring them to a high level of academic attainment. Unfortunately, too much of the educational field continues to address the needs of ELLs and low-achieving students by lowering standards rather than raising them. The result is that students with academic challenges are pulled further behind rather than accelerated. To the contrary, the "Educators-as-Learners (Learners)" who are involved in our work on instructional materials and professional development are hungry for expertise, strategies, and practicable guidelines that can raise the instructional expectations of our high-needs students.

Target Audiences

There are several audiences at a variety of levels who will be using the PD platform we are envisioning:

- **Staff/Administrators:** CGCS staff and selected school district staff who should be able to see "under the hood" of the professional development system.

- **Content Experts and Practitioners:** Seasoned classroom veterans and academicians with decades of experience who will create lessons for their peers.
- **District Office Staff & Principals:** Local school administrators (and their support staffs). This audience will learn lessons they can share with their Learners.
- **Facilitators:** Trained professionals who help peers access and choose lessons within the PD platform. They lead workshops and other face-to-face sessions among Learners who provide a truly high quality learning experience. Each school/district will have at least one dedicated facilitator.
- **Learners:** Classroom teachers and coaches who can inspire our urban youth using lessons from the PD platform.

Attributes of the PD Platform

The PD platform the Council has in mind must have a number of critical attributes to be successful.

- I. The successful PD Platform has technology and a design that will allow it to be:
 - A. **Blended, i.e.,** It offers self-paced online modules and face-to-face support from trained facilitators along a seamless continuum of activities.
 - B. **Distributed, i.e.,** It offers opportunities for peers (e.g. Facilitators or Educators) to connect and share solutions across districts and states.
 - C. **Fluid, i.e.,** So Learners can choose specific modules that they've identified as presenting the greatest opportunities for growth. Their school district offices and principals can queue lessons for individuals or groups as areas for improvement are identified.
 - D. **Mobile and Flexible** because today's educators are short on time and learn on-the-go. Our lessons should be brief and to the point. They can be printed from a desktop or accessed electronically *via* a mobile device.
 - E. **Constituent-Focused, i.e.,** The platform is targeted to a specific, identified market. We are uniquely positioned to develop ELL-focused PD content and deliver it *via* a revolutionary technological system, designed specifically around the ways in which professionals in our urban network learn today.
 - F. **Easy to use, i.e.,** the platform should be intuitive and accessible to beginners and experts alike.

Content Development

Academic content is now being produced by the Council to inform the subject matter of its professional development and will be released as we build the PD platform throughout 2016. CGCS has assembled a team of preeminent content experts and practitioners who are writing lessons and collecting resources, and we are filming classroom videos now.

The Importance of Content Organization and Formats

All lesson-cycle assets (texts, resources, guides, video assets, teaching examples, and related content) are being developed using standard planning templates with content organized by subject (ELA/ELD or math) and instructional level (elementary or secondary education).

Final lesson content will be housed in an intuitive, flexible content-management system (currently we use Google Drive). We need all “print” documents to be accessible as living, editable, online documents or as static (e.g. PDF-formatted) artifacts from a single source (e.g., *via* URL conventions). Additionally, all videos should be accessible as online/streaming assets where bookmarks and annotations can reside, but can also accommodate downloadable versions for offline consumption.

We believe that this will offer a number of practical advantages:

- All documents (in all formats) live at a fixed address/URI.
- A Learner can download multiple documents (read: folders) as zip files for offline use. A zip can be initiated at any level depending on need.
- Documents are properly scaled for differing types of devices: desktop, mobile, tablet, etc.
- Learners can provide feedback directly within the document, and authors can respond directly.
- When documents are updated, new content flows automatically into relevant locations.
- Participants will be able to make copies of template documents or initiate new documents within the PD platform.
- Finally, participants at all levels become experts using the online document authoring systems, which develops transferable digital literacy skills in the classroom and among peers.

Lesson Cycle Description & Requirements

Each Content Module that the Council and its team are developing will consist of several Lesson Cycles, and each Lesson Cycle (or Lesson) will consist of three main Phases: Learn, Plan/Apply, and Reflect. The Lessons will follow a broad arc as Learners interact with the PD platform:

- I. **Intro/Context:** Short 2- to 5-minute videos from renowned content experts or panels who introduce each topic. Learners can bookmark or annotate video segments (these annotations can be private or shared with peers within the PD platform).
- II. **Learn:** Readings and research are provided online (e.g., tear off a copy of a Google doc and annotate it) or in print formats. Materials might include articles from scholarly journals, white papers by content experts, videos of exemplary practice, websites, etc. Required and recommended 'texts' are clearly organized and prioritized.
- III. **Plan:** Educators plot how to implement each new technique or method into their own teaching. Educators can author public/private lesson plans they can experiment with in the classroom.
- IV. **Apply:** Educators try a technique or method and reflect after the fact (written analysis or self-captured video).
- V. **Reflect:** Educators reflect on their own practice. Writing- or video-capture-spaces are provided for personal, small-group, and large-group reflection.

Other requirements for lessons and technology:

- VI. **Mobile:** mobility and smart-phone integration are critical to the success of this PD platform.
- VII. **Formatted:** part of mobility is that materials should be available in print format or for devices.
- VIII. **Varied activities:** Learners will be able to do myriad tasks within the PD platform. These will include discussions (e.g., f2f, synchronous, asynchronous), polls, chats, journals, problem sets, and more.
- IX. **Clear:** lessons must follow a clear, linear progression in which the Learner can see where he or she is going (and where they've been).

Platform Descriptions and Roles

Some of the roles and workflows should include:

- **Administrators:** Oversee the technical workings of the system and ensure that each member has been assigned the appropriate role to access activities and tools they most need within the PD platform. Can assume other roles. Can edit, move, and delete content. Have access to all data, dashboards, and analytics about the performance of individual Learners, districts, and entire PD population. Can define what content should be gated (or restricted) until other modules have been completed.
- **Content Experts and Practitioners:** Access, update, and ‘publish’ materials on specific lessons to which they have “write” access.
- **District Offices & Principals:** Assign to Learners modules and lessons that align to strategic professional development goals of their districts. They will have access to dashboards that indicate their Learners’ progress in mastering lessons that were assigned or were self-selected by Learners themselves. They will be able to see how their Learners’ performance compares to other Council districts.
- **Facilitators:** These individuals have special lesson-planning materials and communications channels within the PD platform. They can assign modules and lessons to individuals in their districts.
- **Learners:** Can access materials that they’ve been assigned and choose other modules “a la carte”. Performance could gain Learners ‘points’ that might grow their status as PD “ninjas”.
- Each of these roles could be formed into **Groups** that represent administrative units within states, districts, and schools. Groups should update dynamically *via* data feeds from staff rosters.

Content management features should include:

- **File management.** Learners should be able to tear off and modify copies of extant files, upload/copy/move their own files and share content with individuals or groups within the PD platform.
- **Portfolios and Aggregation.** Learners should be able to “star” content and assemble it into a portfolio that demonstrates subject mastery.

- **Collaboration.** Collaboratively edited documents (e.g., lesson plans) should be a staple of the PD platform.
- **Content Rating.** Learners should be able to “upvote” particularly compelling lessons to bring them to the attention of the broader community.

Workflow features include:

- **Lesson Queueing & “Prescriptions”.** District Offices, Principals, and Facilitators will want to queue specific lessons for Learners (or Groups) that are working on specific PD goals. The PD platform should provide queueing tools and analytics about success.
- **Search & Tagging.** In order to prescribe or self-select lessons, users at all levels must be able to find appropriate content. A tagging taxonomy will be applied to each content item, Lesson, and Module.
- **Gated content.** The full library of content should be accessible only after completion of a gateway “Foundations” module that articulates a theory of action, defines key terms, and establishes expectations. The PD platform should enforce this prerequisite before allowing a Learner to proceed.
- **Assessment, Self-Evaluation, and Reflection.** The “plan, apply, and reflect” segments of each Lesson Cycle should allow robust reflection tools that can be accessible to the public, a group, or could be held privately.

Some Data Analytics features should include:

- **Accountability.** Assessing completion and holding Learners accountable is an important feature of the PD platform. Individual Learners, facilitators, and school administrators can all contribute to the feedback.
- **Reporting.** The data are digestible and presented in comprehensible visualizations and reports. Each role should be able to see basic reporting (e.g., Principals and District Offices should be able to see completion rates for Learners and Groups in their districts). At a minimum, reports should indicate time-on-task and what lessons/modules a Learner has completed.
- **Certification & Badging.** If learners successfully complete modules in the PD platform, they should be awarded points/certificates/badges that bestow recognition of higher and higher levels of completion, which could be represented in a scoring system using different color “belts” or titles or could be used for some reward or recognition.)

Some High-Level System/Technical Guidelines

The PD platform should be a flexible, hosted solution that can reside in whole or in part on scalable, independent server architectures (e.g., Google Cloud, AWS). The technical environment should be comprised of appropriate industry-standard frameworks and in development languages that are maintainable and transferrable in the open market.

We want a technological solution that scales to a large number of users without significantly increasing overall cost: new Learners will come onto the system for a couple of lessons and then might remain dormant for months until they return for another lesson.

Data structures should, where possible, comply with education- and industry-standard data formats that will enhance interoperability among systems (e.g., between PD platforms and district/school staffing or SIS systems). The PD platform should incorporate lightweight APIs that allow content sharing (e.g., information about participants and their role) among systems.

Single-Sign-On features should be broad and inclusive. They should accommodate the most tightly closed districts and an individual signing up with a Gmail account as long as they're whitelisted into a group or *via* an invitation or access-code mechanism. For districts that simply will not allow single sign on, Administrators should be able to manage batches of data (e.g., CSV files) to add district members to the PD platform.

The PD platform should be designed in a way that protects students' rights where appropriate (e.g., under FERPA) and protects the intellectual property of CGCS, its content experts, and the Learners who interact with the platform.

Development Timeline

This is a two-year project. CGCS has already begun developing content. When we welcome you aboard, we will expect you to spin up quickly! If we get started in the winter of 2016, development will continue through the summer of 2017.

Major launch dates:

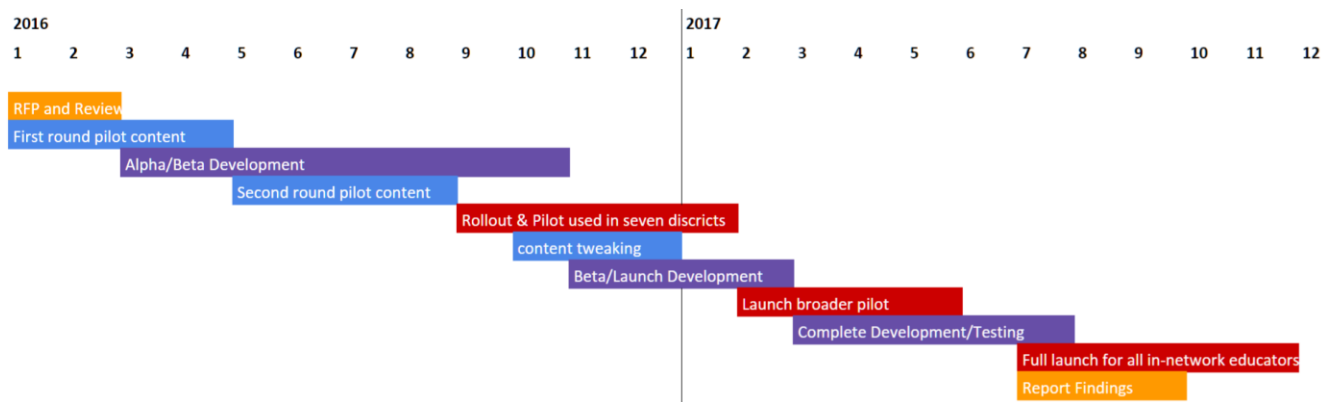
- Pilot* for ~seven districts: October 2016.
- Soft Launch for wider pilot group: early 2017.
- Full launch for all in-network Learners: fall 2017.

* The “pilot” mentioned above will involve a small subset of the PD platform (2-4 Lesson Cycles) and would be delivered to approximately fifty participants in seven districts. It would include Learners and some Administrators, Content Experts, and Principals/District Offices.

Content development dates.

Content development has already begun. The first batch (which will “air” in the October 2016 pilot) will be delivered to CGCS in April 2016. All pilot content is due August 2016. All content (for foundation lessons and pathways lessons) is due November 2016. Please see the attached “[Content Template](#)” for a description of content we are developing with our content experts.

Simple Gantt Chart



[View or tweak Gantt chart here.](#)

The “Ask” & How to Respond

Please create a proposal that addresses the following:

1. Describe how you would define and develop a specific system architecture and feature requirements for this project.
2. When developing this PD platform please describe in broad terms:
 - a. What off-the-shelf LMS tools would you recommend?
 - b. What third-party tools would we employ? How would you choose these tools and integrate them with the core LMS?
 - c. What elements would need custom development?
 - d. How would you deliver consistent design with other CGCS websites?
3. How would you work with CGCS? How do you involve your clients in your build process?
4. Please provide an overview of your development costs based on the schedule outlined above. If possible, break down development costs in terms of broad milestones/

deliverables. Provide an idea of ongoing hosting/support costs as the project goes “to scale”.

5. Provide the names and roles of primary staff members who will be responsible for developing the platform.
6. You’ll likely have several questions...what questions come to mind after having read this RFP?
7. Please send three references, two of which are current or past clients.

Responding to this RFP

Please respond with a proposal by close of business on March 10, 2016 to the PD Project Team via email at <pdproject@cgcs.org> with a PDF attachment that addresses the questions above.

Closing

We are looking for a *partner* to help us develop a technological platform that can disseminate this important work to urban educators nationwide. This project represents a tremendous opportunity for the right firm to grow its experience within the elementary and secondary education professional development space, while having a powerful positive impact on instructional practice in America’s Great City Schools. It also represents a significant challenge, and we hope to choose a collaborator who is as invested in success as we are.

ELL INSTRUCTIONAL MATERIALS PROJECT

Goal:

Develop a set of criteria to help member school districts in the selection of instructional materials in mathematics that are 1) aligned to the Common Core and other new College and Career-Ready standards, and 2) are effective with ELLs at various levels of English proficiency, as well as with any students who experience language-related challenges during mathematics instruction. Special attention is being given to the intersection of language and mathematical understanding, reflecting a key shift in the new standards.

Math Team Members:

Harold Asturias, University of Berkeley
 Judit Moschkovich, University of California, Santa Cruz
 Lily Wong Fillmore, University of Berkeley, Professor Emerita
 Kevin Oh, University of San Francisco
 Phil Daro, Mathematics educator
 Elizabeth Gamino, AIMS Center for Math and Science Education
 Cathy Martin, Denver Public Schools
 Jennifer Yacoubian, Denver Public Schools
 Julio Moreno, San Francisco Unified School District
 Karla Estrada, Boston Public Schools
 Frances Esparza, Boston Public Schools
 Maria Crenshaw, Richmond Public Schools
 Judy Elliott, EduLead, former senior staff member in various Council districts

Timeline:

August 2014	ELD 2.0 Framework published, including considerations for selecting instructional materials for ELLs in ELA/ELD ; this spurred many requests for a similar document related to mathematics .
Summer 2015	Mathematics Team recruited and confirmed
September 2015	“Virtual meeting” of the Mathematics Team Topic: Objectives, establishing common ground
October 2015	Mathematics Team convenes during CGCS Fall Conference in Long Beach Topic: Non-negotiables and Theory of Action
December 2015	“Virtual meeting” of the Mathematics Team Topic: Debrief/discuss notes and draft-to-date
February-April 2016	Development & Internal Review of Instructional Materials narrative and Criteria Matrix
April 2016	“Virtual meeting” of the Mathematics Team Topic: Debrief/discuss edited document and criteria
May 2016	Present Update & document at BIRE Conference
July 2016	Present Update & document at Curriculum & Research Meeting
Autumn 2016	Publish Document

Districts Interested in Participating in Procurement Project.

Council of the Great City Schools

District	ELL/Curriculum Contact	Responsible for Materials Adoption/ Procurement Contact	Notes
Austin			
Boston	Frances Esparza fesparza@bostonpublicschools.org	Joelle Gamere, Director of ELL Instructional Support and Professional Learning K-12 jgamere@bostonpublicschools.org Jenelle Lawson-Vazquez, Staff Assistant to Professional Learning and Principal Leaders dtran2@bostonpublicschools.org	
Cleveland			
Denver	Helen Butts helen_butts@dpsk12.org Ivan Duran, Assistant Superintendent, ivan_duran@dpsk12.org	Devyn Fletcher, devyn_fletcher@dpsk12.org	
El Paso			
Long Beach			
Milwaukee			
Oakland	Nicole Knight Nicole.knight@ousd.org		Tentative Yes
Palm Beach	Margarita Pinkos, Director, Multicultural Education Margarita.pinkos@palmbeachschools.org g Kim Thomasson Manager, Multicultural Education Kim.thomasson@palmbeachschools.org g	Bill Purtell bill.purtell@palmbeachschools.org	
Sacramento			
San Francisco	Dr. Brent Stephens, Chief Academic Officer stephensb@sfusd.edu	Daisy Santos, Director of Humanities santosd@sfusd.edu	

ELL SURVEY

ELL Status--Initial Identification, Re-classification (exit), and Reporting

Introduction

We are gathering information about the procedures and criteria used in Council member districts for the initial identification and re-classification of English language learners (ELLs). We know that districts use a range of processes and apply distinct criteria for both the initial identification of ELLs when they first enroll in a district, as well as for the re-classification (or exit) of ELLs from ELL programs (then classified as 'former ELLs').

When responding to the questions please note the distinction made between *procedures* and *criteria*.

Procedures: The steps used and individuals involved in the process of either the initial identification or the process of re-classification.

Criteria: The specific assessments and metrics used for the initial identification of ELLs or their exit from ELL programs.

Please share your responses and send any relevant documents to Carol Aguirre at caguirre@cgcs.org. Should you have any questions regarding the content of the survey, please contact Gabriela Uro at guro@cgcs.org

ELL Status--Initial Identification, Re-classification (exit), and Reporting

Contact Information

Please provide the following contact information in case we have to follow up with any questions.

- * 1. Please select your school district.

- * 2. Please fill in the respondent's contact information below:

Full name

Title

Email address

ELL Status--Initial Identification, Re-classification (exit), and Reporting

I. INITIAL IDENTIFICATION OF ELLS

3. Who determines the procedure for the initial identification of a student as an ELL?

- Determined by the state
- Determined by the school district
- Determined by a combination of state and district
- Determined by OCR or DOJ consent decree/court order
- Other (please specify)

4. Who is involved in the initial identification of a student as an ELL?

Please select all that apply.

- Bilingual Ed/ESL Teacher
- Classroom teacher (e.g. elementary)
- English Language Arts teachers
- Principal
- Bilingual Ed/ESOL Staff in Central Office
- Second language acquisition (Bil Ed/ESOL) specialist at the school-building
- Parent
- School registrar
- Central registration staff
- Language Proficiency Advisory Committee (school or district committees for ELL services)
- Court ordered committee

Other (please specify)

5. Who determines the criteria for the initial identification of a student as an ELL?

- Determined by the state
- Determined by the school district
- Determined by a combination of state and district criteria
- Determined by OCR or DOJ consent decree/court order
- Other (please specify)

6. How does your district determine if an ELL is considered 'recent arrival' (federal definition: an ELL who has attended a U.S. school for less than 12 months.)

- Parent questionnaire
- Student transcript
- District does not have a designation for 'recent arrival'
- Other (please specify)

7. What metrics and criteria are included in the procedure for the initial identification of a student as an ELL?

Please select all that apply.

- Home language survey
- Unique Screener assessment for initial identification
- English Language Proficiency assessment (state adopted assessment to annually measure of English proficiency)
- Teacher referral
- Other (please specify)

8. Metrics and criteria used for the initial identification of a student as an ELL.

We wish to learn about districts' use of different screeners/assessments for distinct grade levels and the corresponding criteria for determining whether a student is an English Language Learner (ELL).

Please indicate if your district uses ONE screener/assessment instrument for ALL grades K-12.

- Yes
- No
- If No, please explain

9. Please provide a link to any district document that describes the assessments/screeners used and the corresponding criteria/cut-off scores for all assessments/screeners used in the initial identification of ELLs.

If you do not have access to a link, please email relevant document to Carol Aguirre at caguirre@cgcs.org

Insert link to district or state documents here.

10. Please provide the name and general information regarding cut off criteria for the additional assessment(s) instrument(s) you use for the initial identification of ELLs.

Assessment Name:

Criteria Information:

Assessment Name:

Criteria Information:

Other:

ELL Status--Initial Identification, Re-classification (exit), and Reporting

II. RE-CLASSIFICATION / EXITING ELLs

11. Who determines the procedure for RE-CLASSIFYING/EXITING students from ELL status?

- Determined by the state
- Determined by the school district
- Determined by a combination of state and district criteria
- Determined by OCR or DOJ consent decree/court order
- Other (please specify)

12. Does your state establish a limit on the maximum number of years that an ELL may participate in an English language instructional program?

- Yes
- No

13. Please provide the number of years that an ELL may participate in an English language instructional program in your State.

15. Does your state's limit on ELL's participation in an English language instructional program affect the district's criteria for exiting a student from ELL status?

- Yes
- No
- Please explain.

16. Indicate the individuals involved in the decision to re-classify ELLs or exit students from ELL status?

Please select all that apply.

- Bilingual Ed/ESL Teacher
- Classroom teacher (e.g. elementary)
- English Language Arts teachers
- Principal
- Bilingual Ed/ESOL Staff in Central Office
- Second language acquisition (Bil Ed/ESOL) specialist at the school-building
- Parent
- Student
- Language Proficiency Advisory Committee (school or district committees for ELL services)
- Court ordered committee
- Other (please specify)

17. Indicate who is the primary-decision maker for re-classifying ELLs or exiting students from ELL status.

Please select all that apply.

- Bilingual Ed/ESL Teacher
- Classroom teacher (e.g. elementary)
- English Language Arts teachers
- Principal
- Bilingual Ed/ESOL Staff in Central Office
- Second language acquisition (Bil Ed/ESOL) specialist at the school-building
- Parent
- Student
- Language Proficiency Advisory Committee (school or district committees for ELL services)
- Court ordered committee
- N/A (if not applicable)

Other (please specify)

18. ELPA metrics and criteria used for the exiting from ELL status.

Please provide a link to any district/state document that describes the ELPA cut off scores and/or criteria used in determining the re-classification of ELLs or exit of students from ELL status.

If you do not have access to a link, please email relevant document to Carol Aguirre at caguirre@cgcs.org.

Name Assessment & Total
Number of Levels:

Insert link to district or
state documents here:

Comments:

19. Does your district ONLY use the English Language Proficiency Assessment (ELPA) to make decisions about exiting students from ELL status?

Yes

No

20. State Content Assessment criteria for exiting from ELL status.

Does your district use State Content Assessment results as part of the exit criteria?

If yes, please provide a link to the district/state document indicating the required passing score, by content area.

No, my district does not use State Content Assessments.

Yes, my district does use State Content Assessment results.

Insert link to district or state documents here.

If you do not have access to a link, please email relevant document to Carol Aguirre at caguirre@cgcs.org.

21. Assessments other than the ELPA and State Content Assessments.

Please provide the name and general information regarding cut off criteria for assessments, other than the ELPA and State Content Assessments that your district uses to make decisions about exiting students from ELL status.

Assessment Name:

Criteria Information:

Assessment Name:

Criteria Information:

Comments:

22. Please indicate any other criteria used by your district for reclassifying ELLs or exiting students from ELL status.

- Advisory committees (e.g. Language proficiency advisory committee--LPAC)
- Teacher judgement
- Parent judgement
- Other (please specify)

ELL Status--Initial Identification, Re-classification (exit), and Reporting

III. ELL STATUS FOR REPORTING PURPOSES

Districts are required to report ELL data for a number of purposes and to a number of entities, including SEAs and federal agencies. The next set of questions aim to help us understand the various 'definitions of ELL' used for different reporting purposes, across the Council member districts.

23. For purposes of reporting achievement data and demographic enrollment, which ELL-related definitions are used in your district? Please select all that apply.

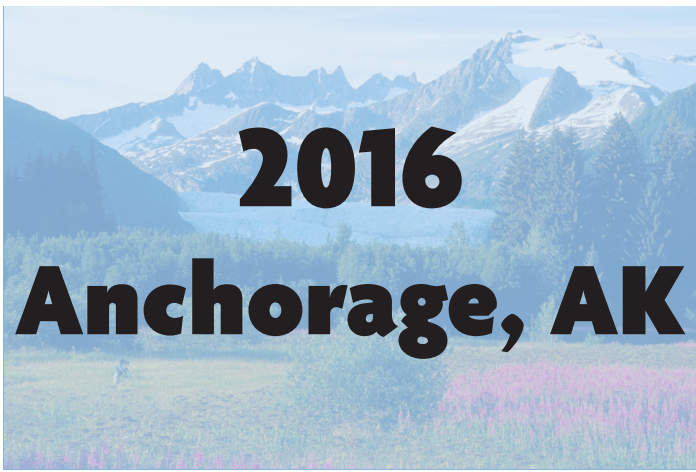
	ELL ACHIEVEMENT DATA	ENROLLMENT DEMOGRAPHIC DATA
Students with ELL status--actively being served by district programs	<input type="checkbox"/>	<input type="checkbox"/>
Students with ELL status--not receiving language instructional services (e.g. opt-out, other)	<input type="checkbox"/>	<input type="checkbox"/>
Students who have exited ELL status within TWO school years	<input type="checkbox"/>	<input type="checkbox"/>
Students who have exited ELL status within THREE to FOUR school years	<input type="checkbox"/>	<input type="checkbox"/>
Students who have EVER been ELL (regardless of when they exited)	<input type="checkbox"/>	<input type="checkbox"/>
Students with ELL status and identified as having a disability (SWD)	<input type="checkbox"/>	<input type="checkbox"/>

ELL Status--Initial Identification, Re-classification (exit), and Reporting

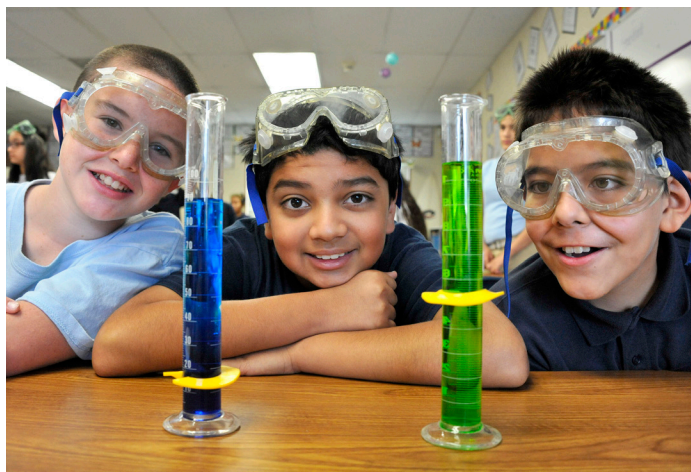
THANK YOU

We appreciate your participation in the survey. Please feel free to send any related documents to Carol Aguirre at caguirre@cgcs.org. If you have questions about the content of the survey, please contact Gabriela Uro at guro@cgcs.org.

**BILINGUAL, IMMIGRANT, AND REFUGEE
EDUCATION DIRECTOR'S MEETING**



Council of the Great City Schools
REGISTRATION BROCHURE
Bilingual, Immigrant, and Refugee Education
Director's Meeting
May 10-13, 2016



2016 BIRE Meeting Anchorage, AK

The annual meeting of the directors of Bilingual, Immigrant, and Refugee Education programs of the Council's member districts will take place in Anchorage, AK at the Lakefront Anchorage Hotel from Wednesday, May 11 through Saturday, May 14. The Anchorage School District's English Language Learners Program is inviting participants to visit schools on May 10th as a pre-meeting event. The BIRE meeting agenda will address the most critical issues including:

- ESSA (Every Student Succeeds Act) Implementation and other legislative updates
- Council Projects: Helmsley-funded Professional Development and Gates-funded Instructional Materials for ELLs
- Work session on selecting instructional materials for mathematics
- On-boarding strategies for new ELL Directors
- District and State collaboration to meet the needs of refugee and other immigrant students and families
- Celebration for *Outstanding Contributions to ELL Achievement*, sponsored by McGraw-Hill Education

School Visits (Only for school districts)

TUESDAY, May 10, 2016

6:30am – 7:30am	Breakfast. Overview of Anchorage School District
8:00am – 2:15pm	Anchorage School District Visits
3:30pm – 4:30pm	School visit debriefing (light refreshments)

Preliminary Meeting Agenda

WEDNESDAY, May 11, 2016

7:30am – 4:00pm	Formal meeting program
4:00pm – 6:00pm	Welcome reception at the Lakefront Anchorage Hotel

THURSDAY, May 12, 2016

7:30am – 3:30pm	Formal meeting program
4:45pm – 8:30pm	Tour and dinner reception at the Native Heritage Center

FRIDAY, May 13, 2016

7:30am – 4:30pm	Formal meeting program
5:00pm	BIRE programmed activities

SATURDAY, May 14, 2016

8:00am–11:00am	Formal meeting program
11:00am–5:00pm	BIRE programmed activities

Council of the Great City Schools

Bilingual, Immigrant, and Refugee Education Director's Meeting

Register online today at: <http://event.com>

REGISTRATION and SPONSORSHIP FEES

\$250 Council member School District

\$400 Non-member School District

\$600 Additional attendee from sponsor company

REGISTRATION REFUND AND CANCELLATION POLICY:

All cancellations or name changes must be in writing and emailed to Angel Gooch at agooch@cgcs.org.

Registrations cancelled **on or before** April 19, will receive a full refund. Cancellations from April 20 to April 29 will be billed or refunded 50% of the registration fee. Cancellations after April 29 or no-shows on May 10th will not receive a refund and will be billed the full amount. Purchase orders will not be accepted on site.

HOTEL INFORMATION

Lakefront Anchorage

4800 Spenard Road

Anchorage, AK 99517

(907) 243-2300

<http://www.millenniumhotels.com/usa/millenniumanchorage/>

CUT-OFF DATE: APRIL 19, 2016

Single & Double room rate: \$129.00 per night plus tax

Mention: Council of the Great City Schools to receive group rate.

Call directly to make your Hotel reservations at (907) 243-2300. All reservations must be guaranteed & accompanied by a first night room deposit or guaranteed with a major credit card.

Reservations should be canceled by 2 p.m. local Anchorage time one day prior to arrival to avoid cancellation penalties.

For registration, invoice or payment questions contact Angel Gooch at (202) 393-2427, or at agooch@cgcs.org.



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 70 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, Arlington (Texas), Atlanta, Austin, Baltimore, Birmingham, Boston, Bridgeport, Broward County (Ft. Lauderdale), Buffalo, Charleston County, Charlotte-Mecklenburg, Chicago, Cincinnati, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), El Paso, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), 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, Pinellas County, Pittsburgh, Portland, Providence, Richmond, Rochester, Sacramento, San Antonio, San Diego, San Francisco, Santa Ana, Seattle, Shelby County, St. Louis, St. Paul, Toledo, Tulsa, Washington, D.C., and Wichita



**Council of the Great City Schools
Bilingual, Immigrant, and Refugee Education Directors Meeting
Anchorage School District Site Visits - Tuesday, May 10, 2016
FOR SCHOOL DISTRICTS ONLY**

Name: _____

Email: _____

Phone: _____

School District: _____

Please select the group of schools you are interested in visiting:

Group 1 Group 2

Names of additional individuals from your district who will participate: _____

Please **email this form** by Friday, May 2 to Telena Martinez at martinez_telena@asdk12.org.

Sign-ups will be on a first-come, first-served basis, until each group reaches capacity. You will receive a confirmation of your assigned group no later than the week before BIRE.

AGENDA

6:30am – 7:30am			
<i>Welcome breakfast / reception with Anchorage School District representatives - Lakefront Anchorage Hotel</i>			
7:45am	Depart hotel	7:45am	Depart hotel
8:15am – 9:45am	Site 1: Alaska Native Cultural Charter School	8:15am – 9:45am	Site 1: East High School
9:45am – 10:00am	Travel	9:45am – 10:00am	Travel
10:00am – 11:30am	Site 2: Wendler Middle School / Newcomer Center	10:00am – 11:30pm	Site 2: Williwaw Elementary
11:30am – 12:30pm	Lunch - Wendler Middle School	11:30pm – 11:45pm	Travel
12:30pm – 12:45pm	Travel	11:45pm – 12:45 pm	Lunch - Clark Middle School
12:45pm – 2:15pm	Site 3: Government Hill Elementary	12:45pm – 2:15pm	Site 3: Clark Middle School
3:30 p.m. – 4:30 p.m.			
<i>Debrief from school visits (with light refreshments) - Lakefront Anchorage Hotel</i>			

SCHOOL DETAILS

Group 1: Special Programs Schools	Group 2: Highly Diverse, High-EL Population Schools
Alaska Native Cultural Charter School, Grades K-8 <i>Visiting Native artists will be leading student projects for Culture Week</i> Principal: Bongie Agerter	East High School, Grades 9-12 <i>Most diverse U.S. high school*</i> Principal: Sam Spinella
Wendler Middle School, Grades 7-8/ELL Newcomer Center, Grades 6-12 <i>Neighborhood middle school/Half-day programs for MS & HS newcomers</i> Wendler Principal: Brendan Wilson; ELL Newcomer Center: Phil Farson	Clark Middle School, Grades 6-8 <i>Most diverse U.S. middle school*</i> Principal: Cessilye Williams
Government Hill Elementary, Grades K-6 <i>Two-way Spanish immersion program/Traditional neighborhood program</i> Principal: Mandy Clark	Williwaw Elementary School, Grades K-5 <i>50% English Learners with top languages Hmong, Samoan and Spanish.</i> Principal: Christine Garbe

* Source: Chad Ferrell, UAA Sociology Professor; see local news article: <http://www.629n.com/article/20150523/anchorage-public-schools-lead-nation-diversity>

**LEADERSHIP, GOVERNANCE & MANAGEMENT
TASK FORCE**

COUNCIL OF THE GREAT CITY SCHOOLS
**Task Force on Urban School Leadership, Governance,
and Management**

2015-2016

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 Chair

Jose Banda, Sacramento Superintendent

SCHOOL BOARD SURVEY

School Board Survey Results

Based on School Board, Superintendent
and School Board Secretary Responses
Preliminary

Council of the Great City Schools
Winter 2016

Purpose

- Determine the major characteristics and features of school boards in the Great City Schools
- Assess the perceptions among school board members and superintendents about the work of the boards
- Ascertain opportunities where the Council of the Great City Schools could assist its member school boards
- Begin development of Key Performance Indicators (KPI) on how well boards function

Methodology

Conducted a survey in the summer of 2015 of 68 Council member district board members, superintendents and board secretaries

- 55 superintendents completed the survey
- 40 board secretaries completed the survey
- 220 board members completed the survey
- 58 of 68 districts were represented in survey



POTENTIAL SCHOOL BOARD KPI

Potential School Board KPIs

Superintendent turnover or tenure

School board member tenure

○ Voter turnout for school board elections

Self-evaluation process

Frequency of meetings

Percent of members elected at large

School board manual governing behavior

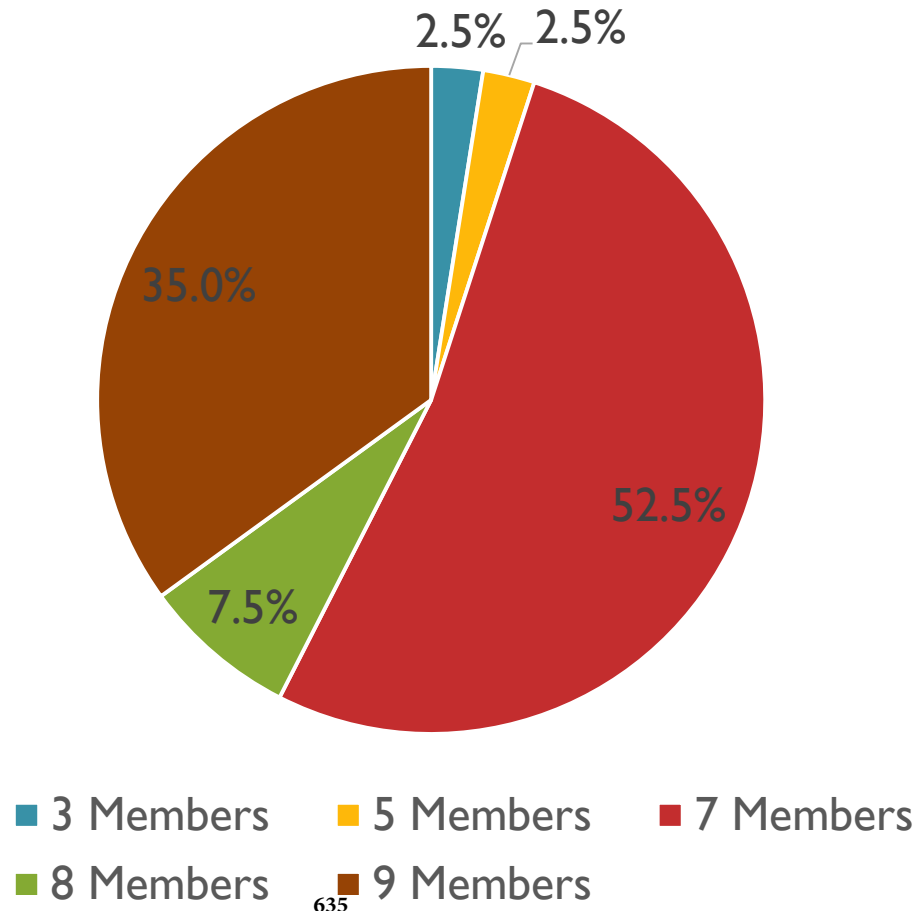
Number of school board committees



THE SCHOOL BOARD MEMBER CHARACTERISTICS

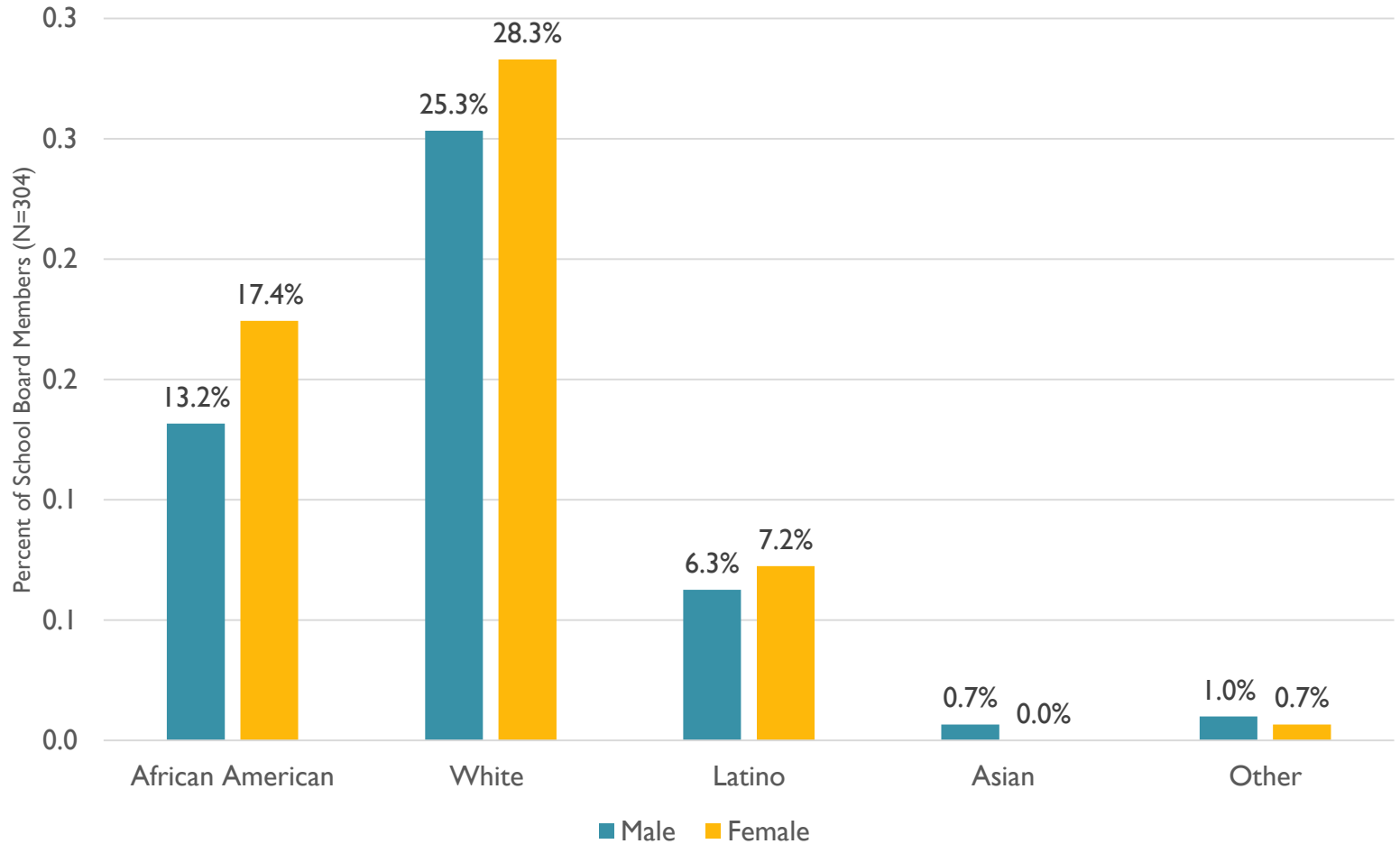
Number of School Board Members

Based on Board Secretary Responses, (n=40)



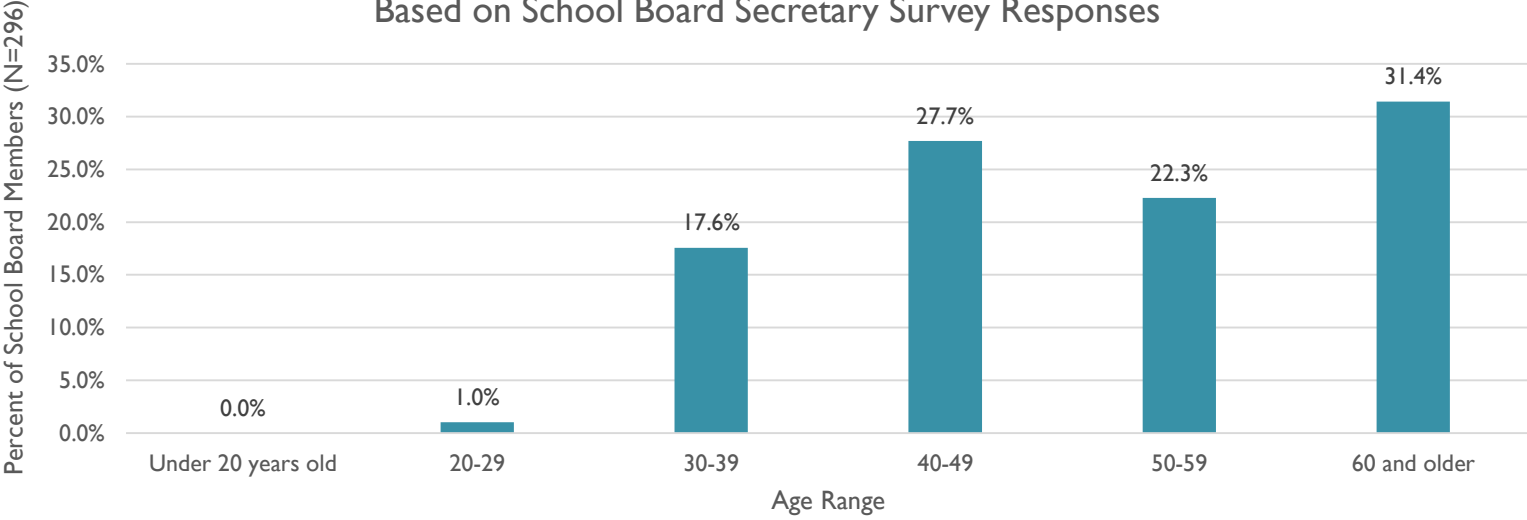
Race and Gender of School Board Members

Based on School Board Secretary Survey Respondents

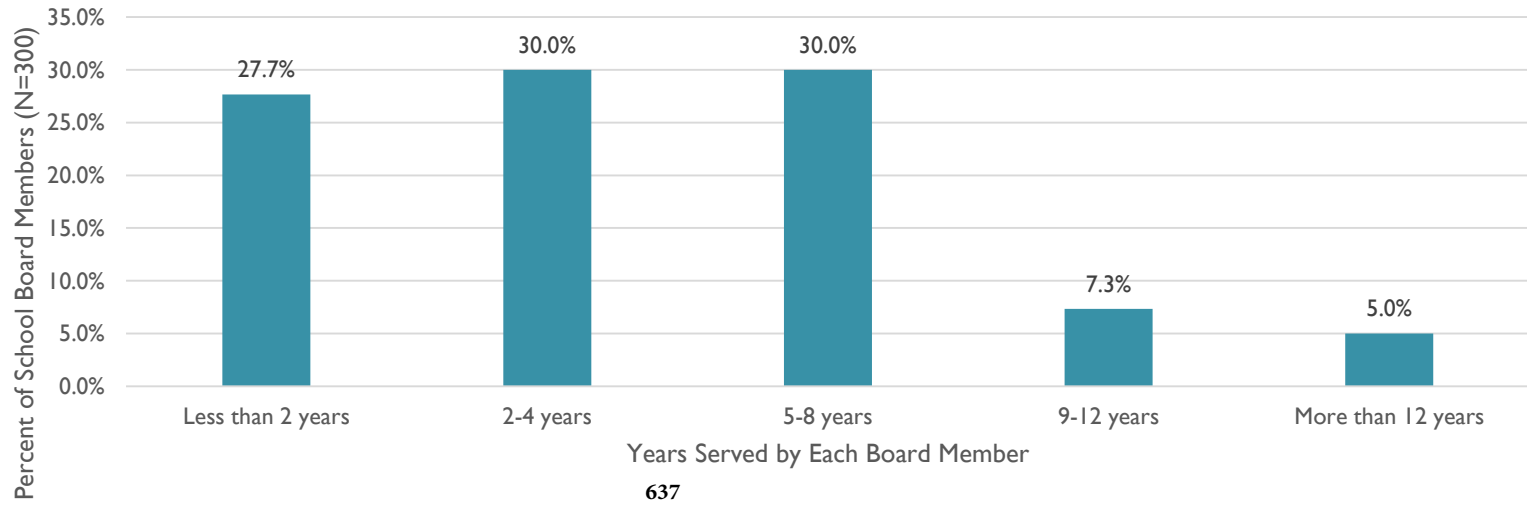


Age and Tenure of School Board Members

Age of School Board Members Based on School Board Secretary Survey Responses

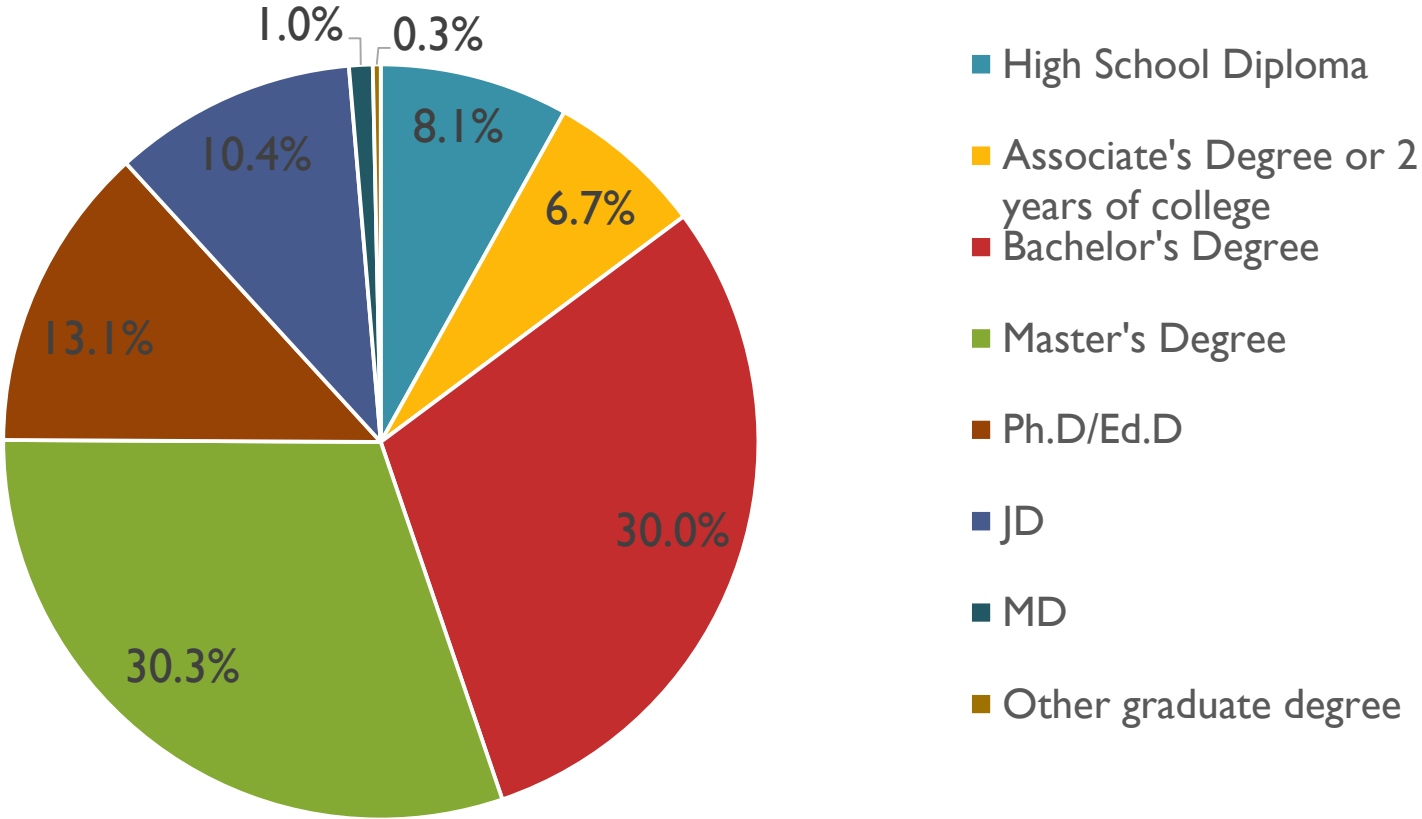


Number of Years Served by School Board Members Based on School Board Secretary Respondents



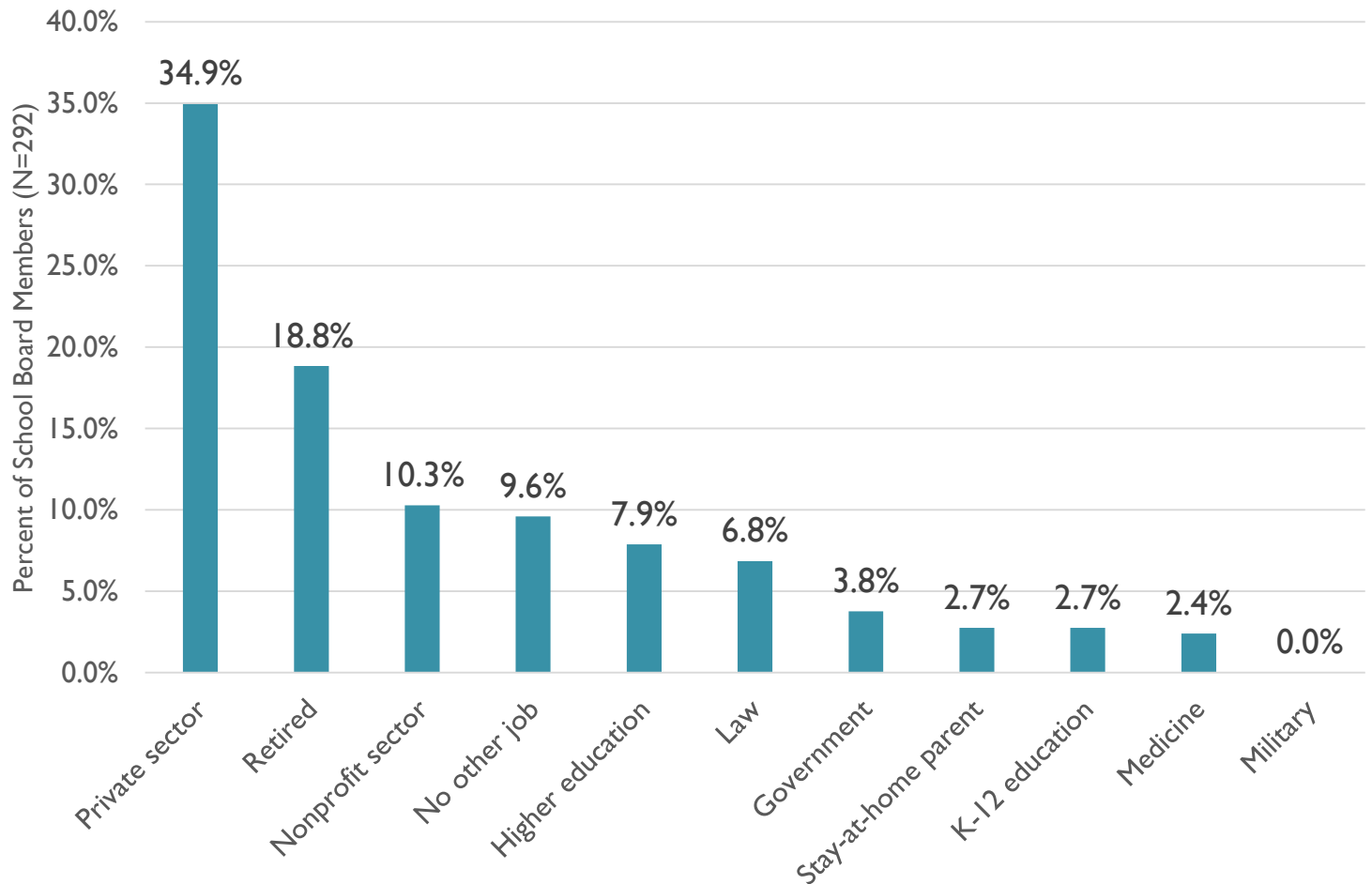
Highest Level of Educational Attainment of School Board Members

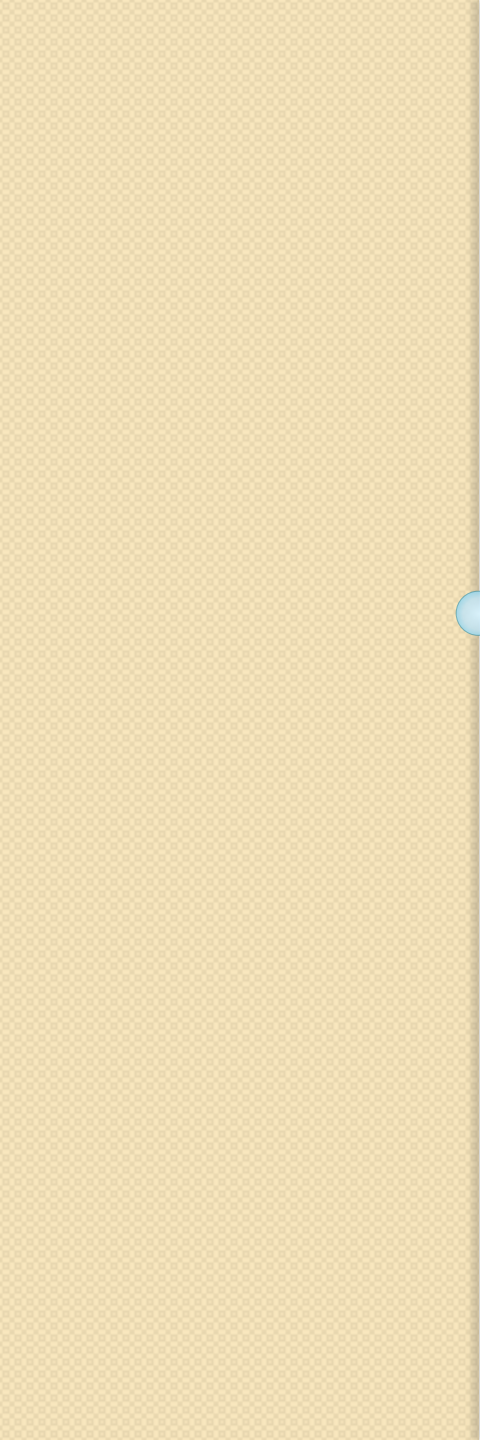
Based on School Board Secretary Respondents (N=297)



Outside Jobs of School Board Members

Based on School Board Secretary Respondents

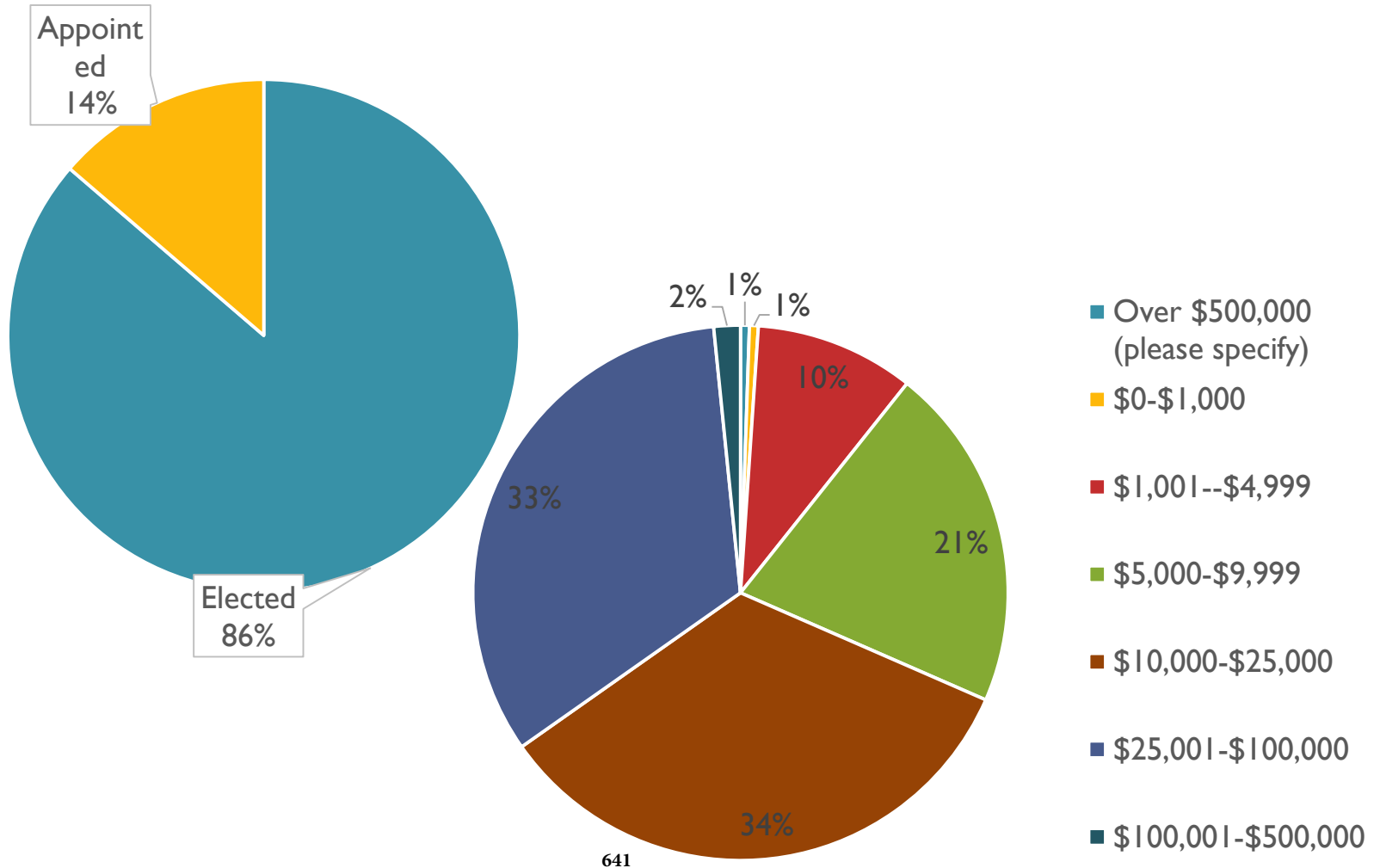




SCHOOL BOARD ELECTIONS AND APPOINTMENTS

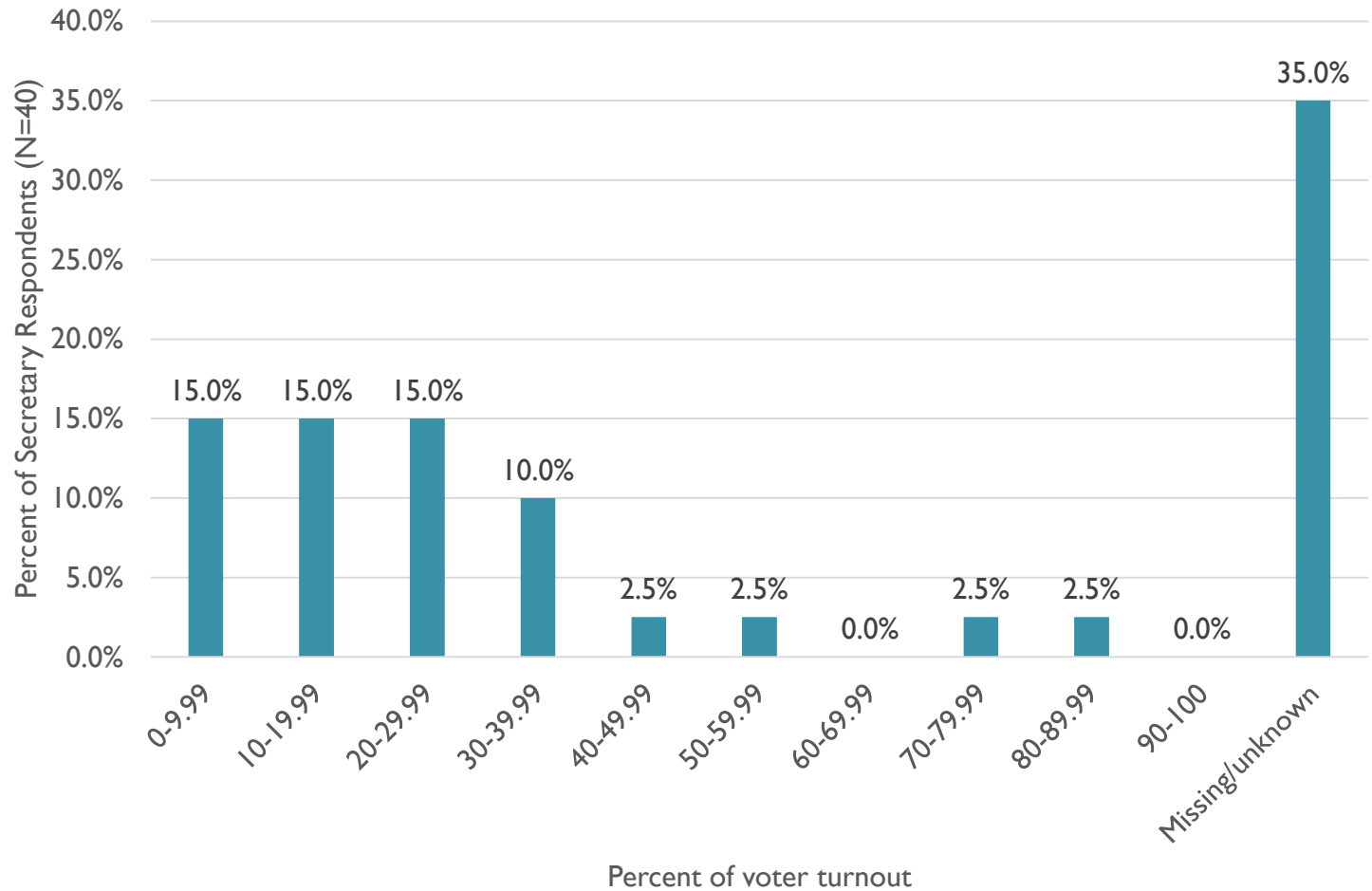
Board Members Elected and Election Expenses

Based on School Board Respondents (N=220)



Estimated Voter Turnout in School Board Elections

Based on School Board Secretary Responses (N=40)

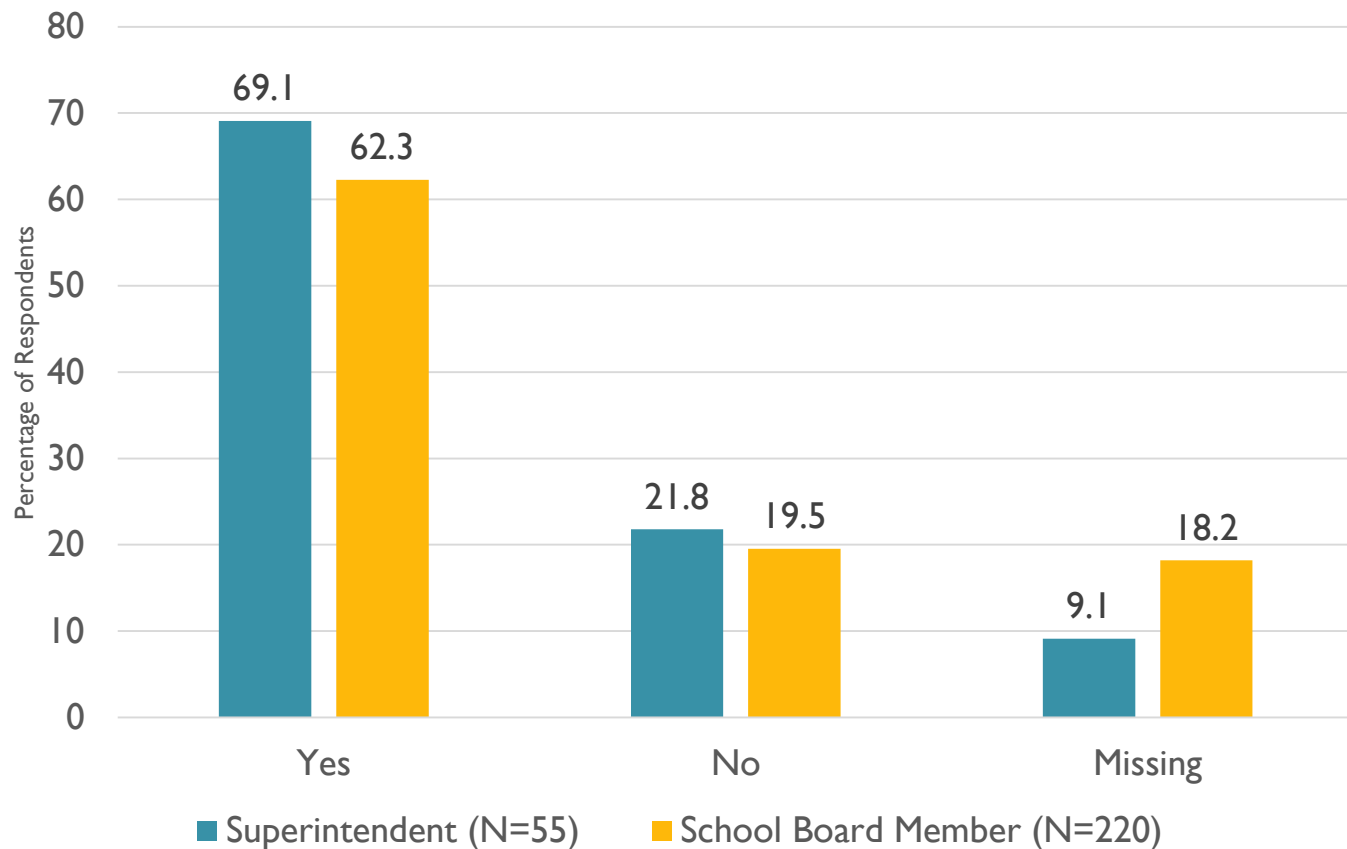




SCHOOL BOARD POLICY MAKING

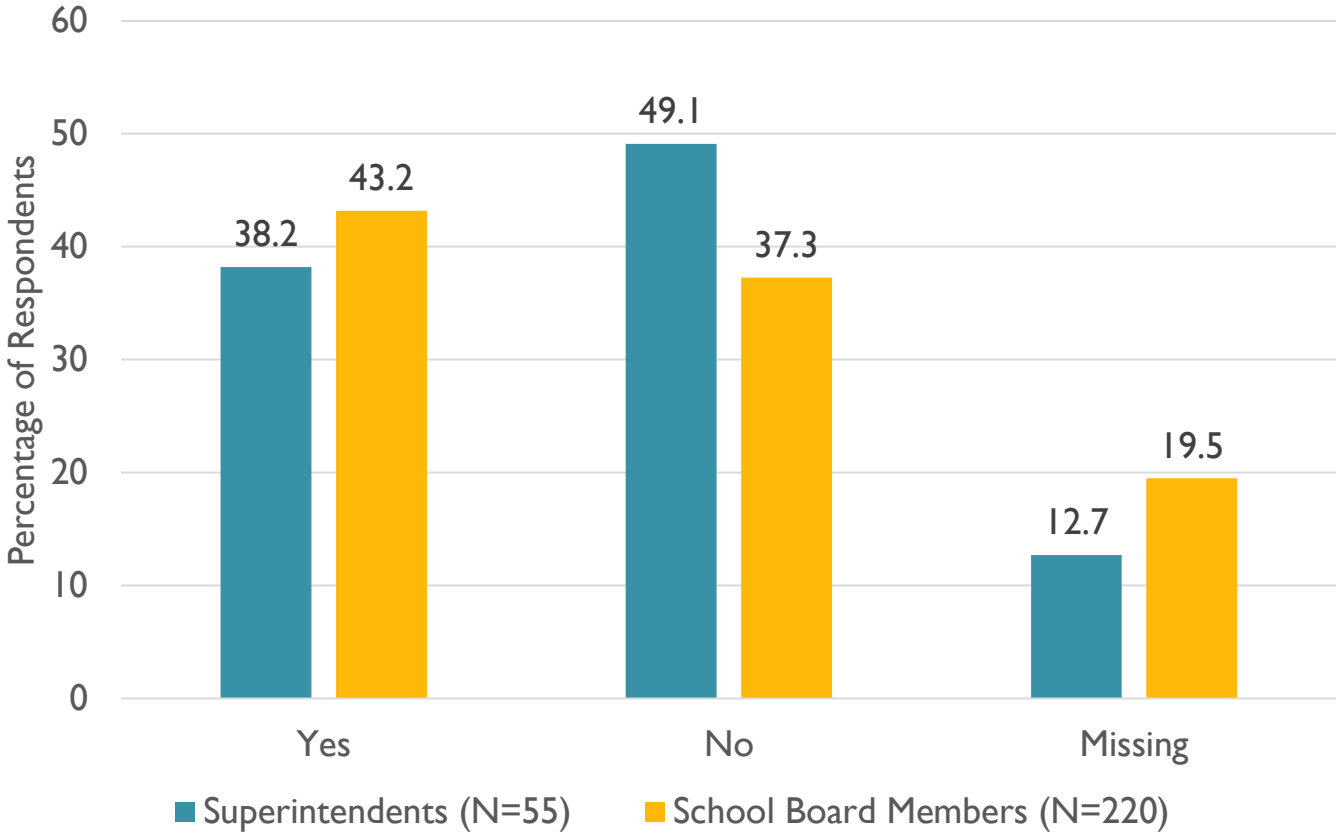
Board Policy Manual

Does the district have a board policy manual (that governs board and board member behaviors) distinct from an administrative policy manual (that governs employee behaviors)?



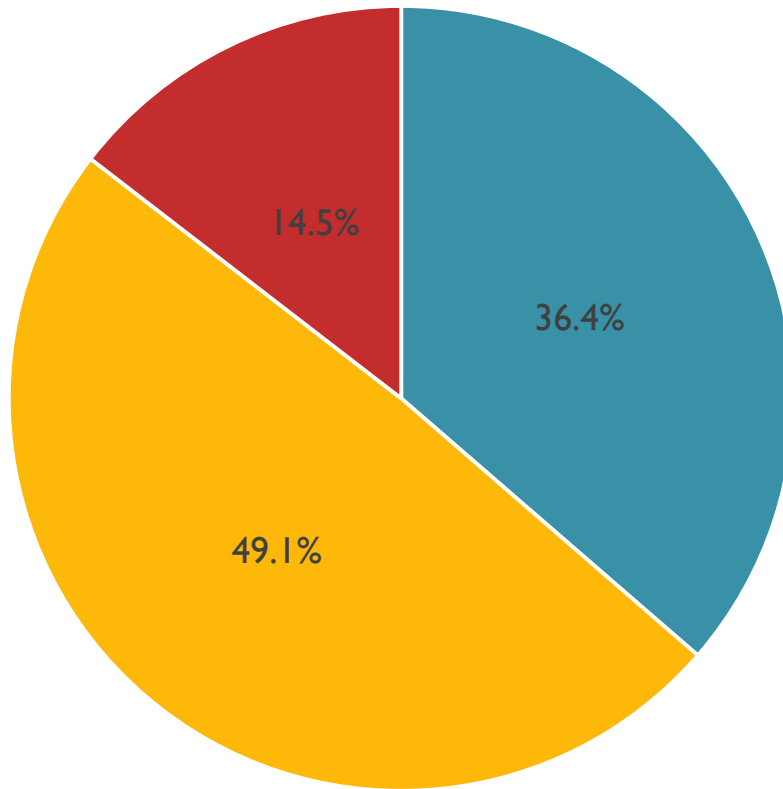
School Board Members' Code of Ethics

Do you have policies and procedures (i.e., a code of ethics) in place to hold school board members accountable for violating board policy?



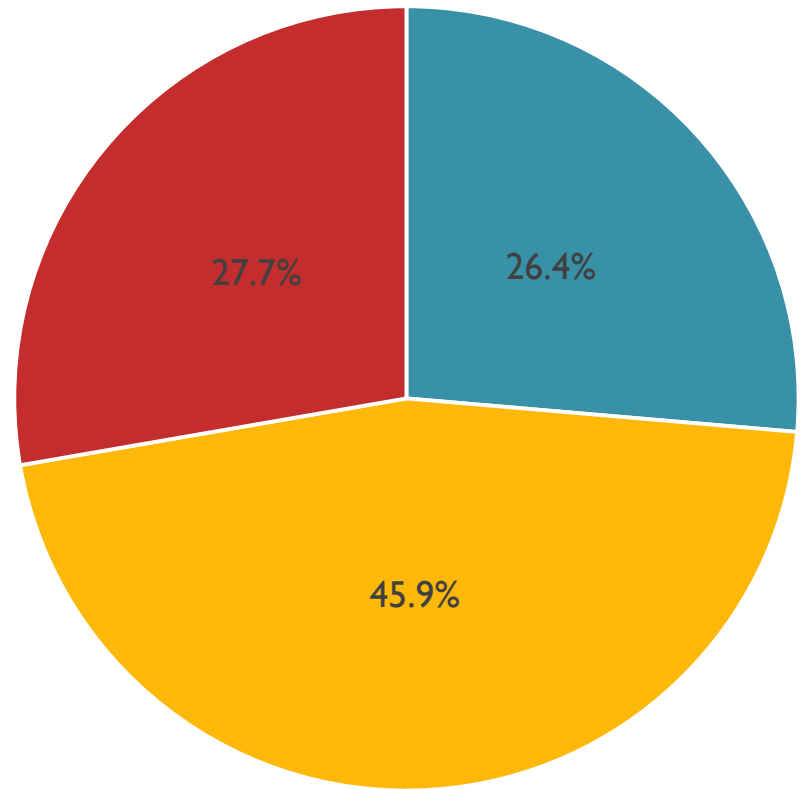
School Board Adopted SMART Student Achievement Goals for SY 15-16

Based on Superintendents' Responses



■ Yes ■ No ■ Missing Response

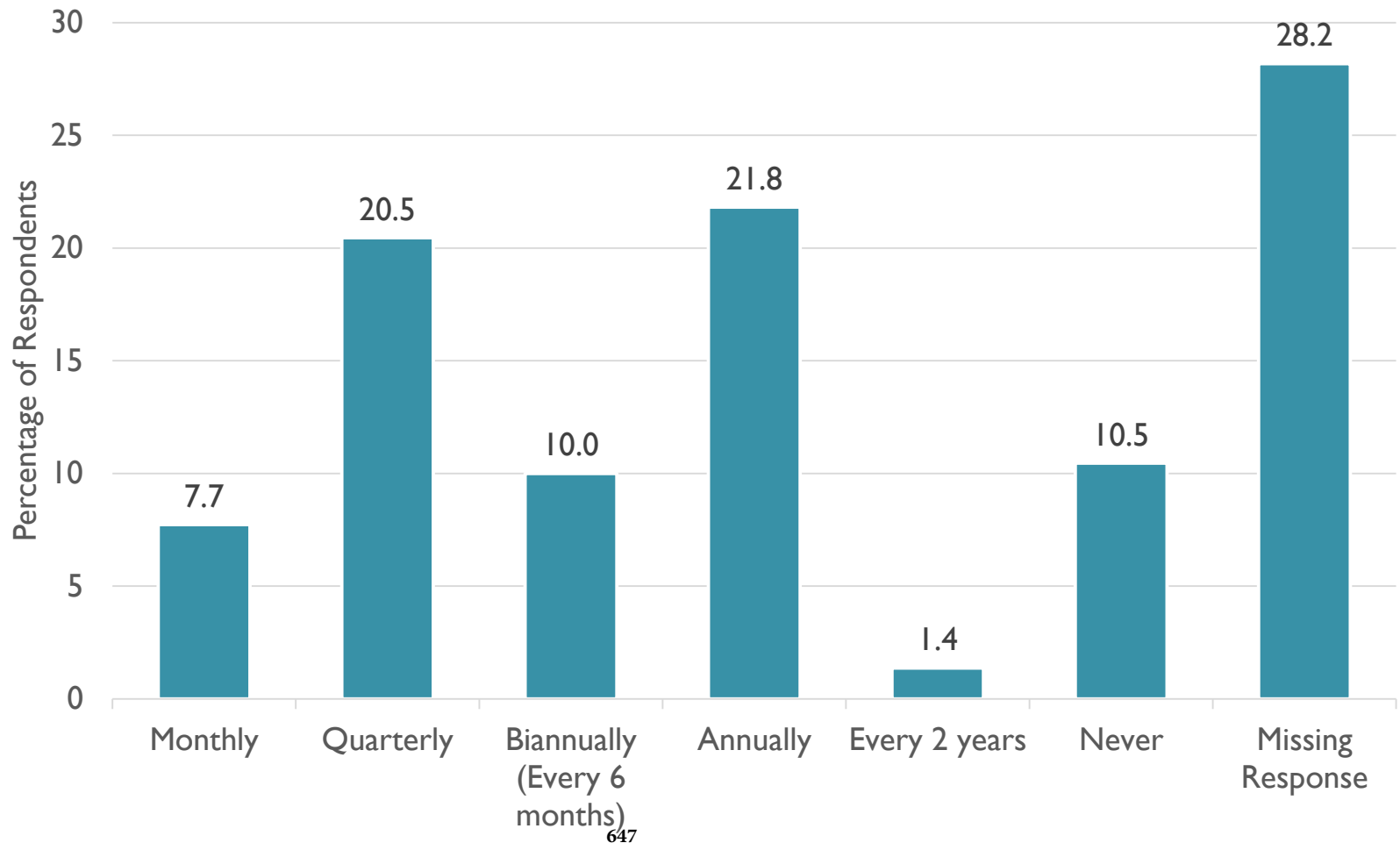
Based on School Board Members' Responses



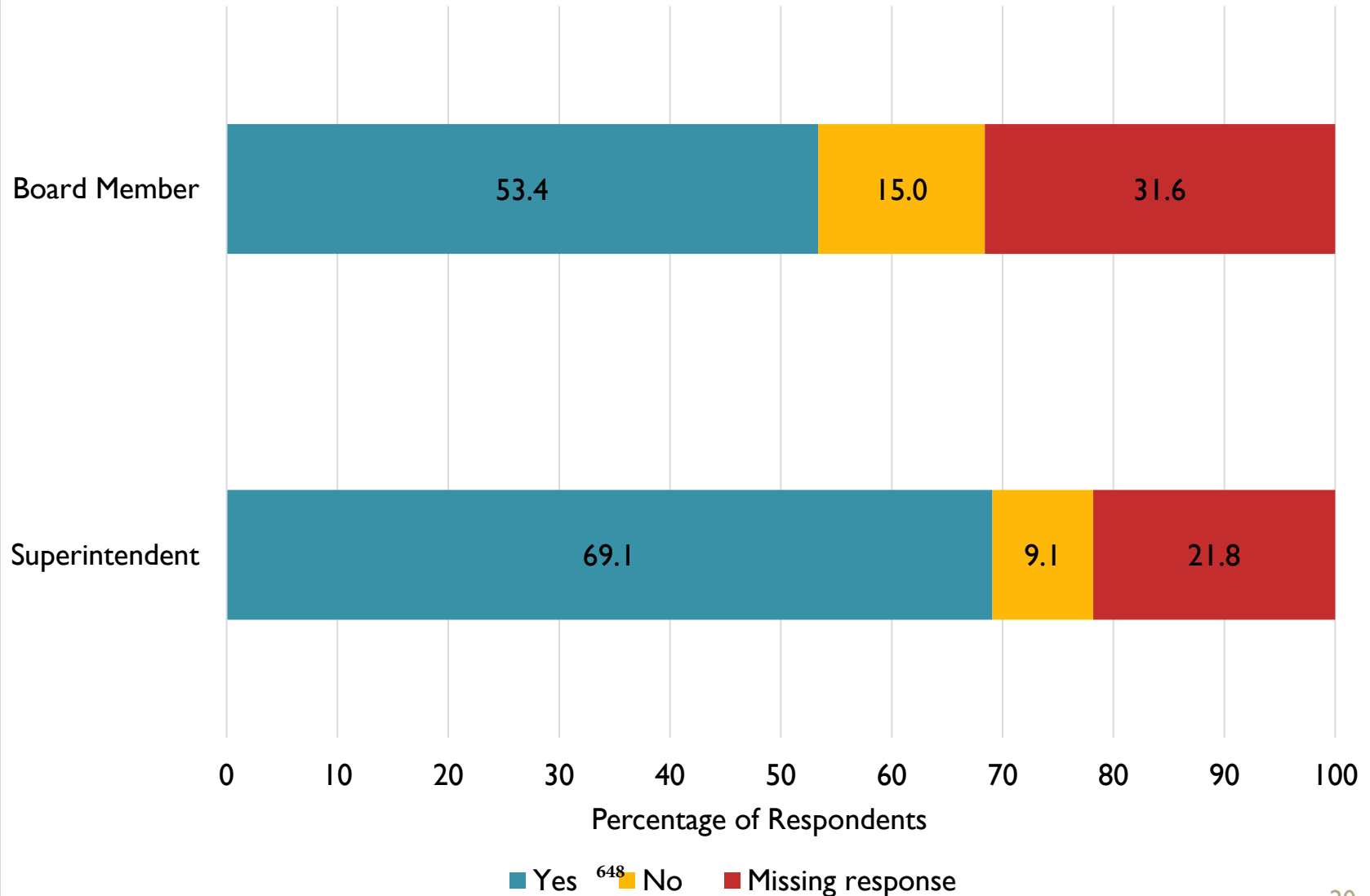
■ Yes ■ No ■ Missing Response


School Board Monitoring of Progress Toward Student Achievement Goals

How frequently does the school board monitor progress toward the student achievement outcome goals? (N=220)



Role of Board Chair is Distinct from Other School Board Members

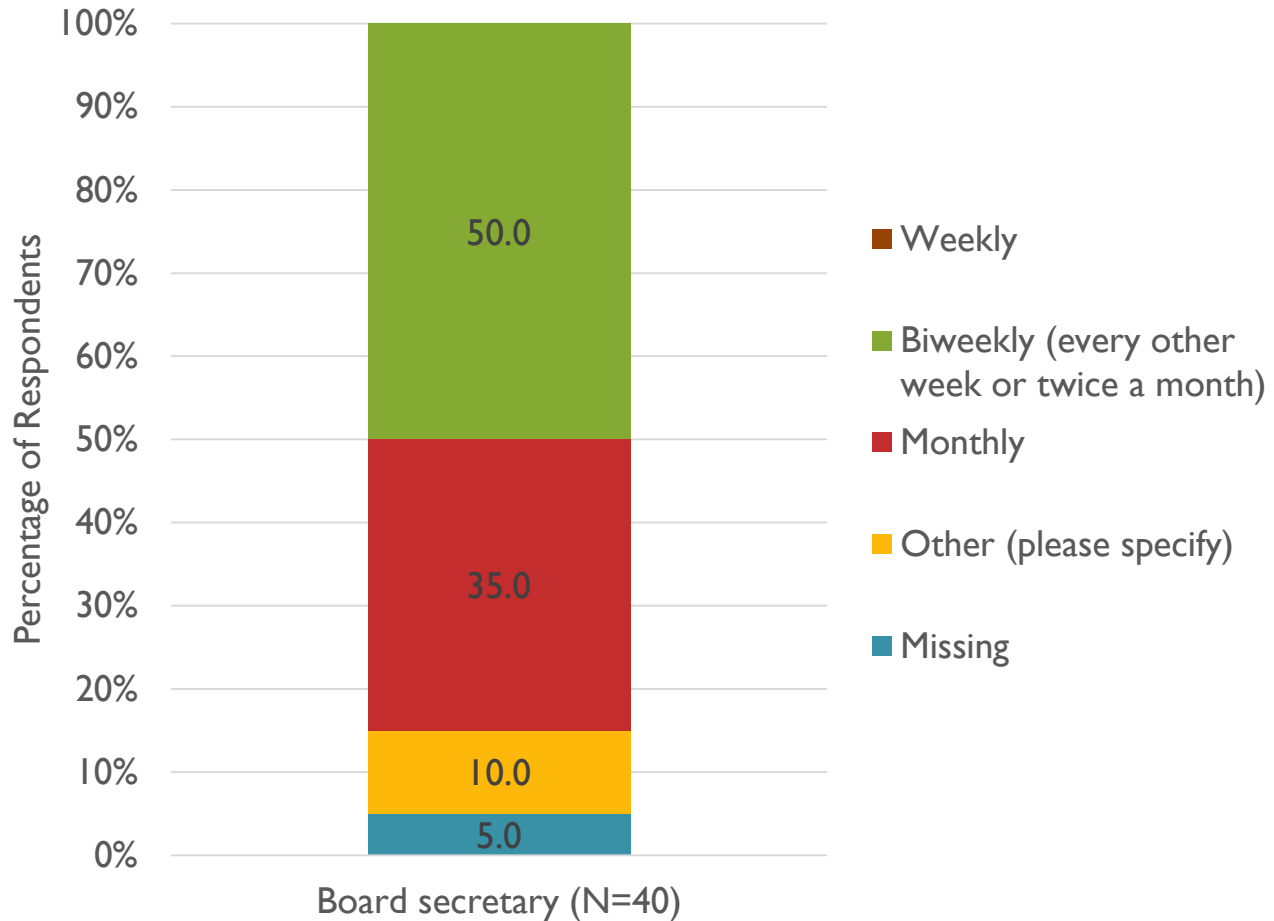




SCHOOL BOARD MEETINGS AND OPERATIONS

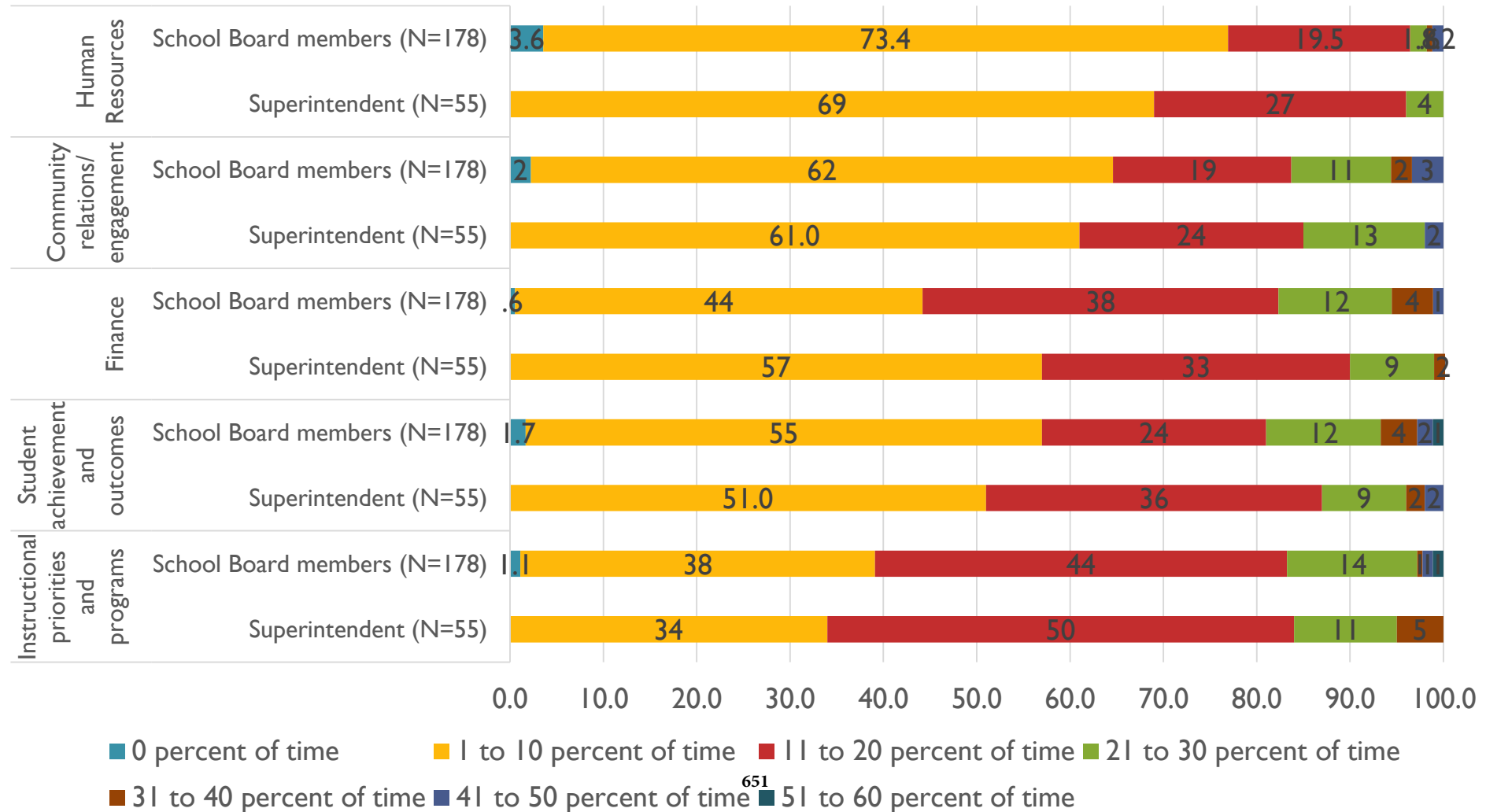
Regularly Scheduled School Board Meetings

Based on Board Secretary Responses

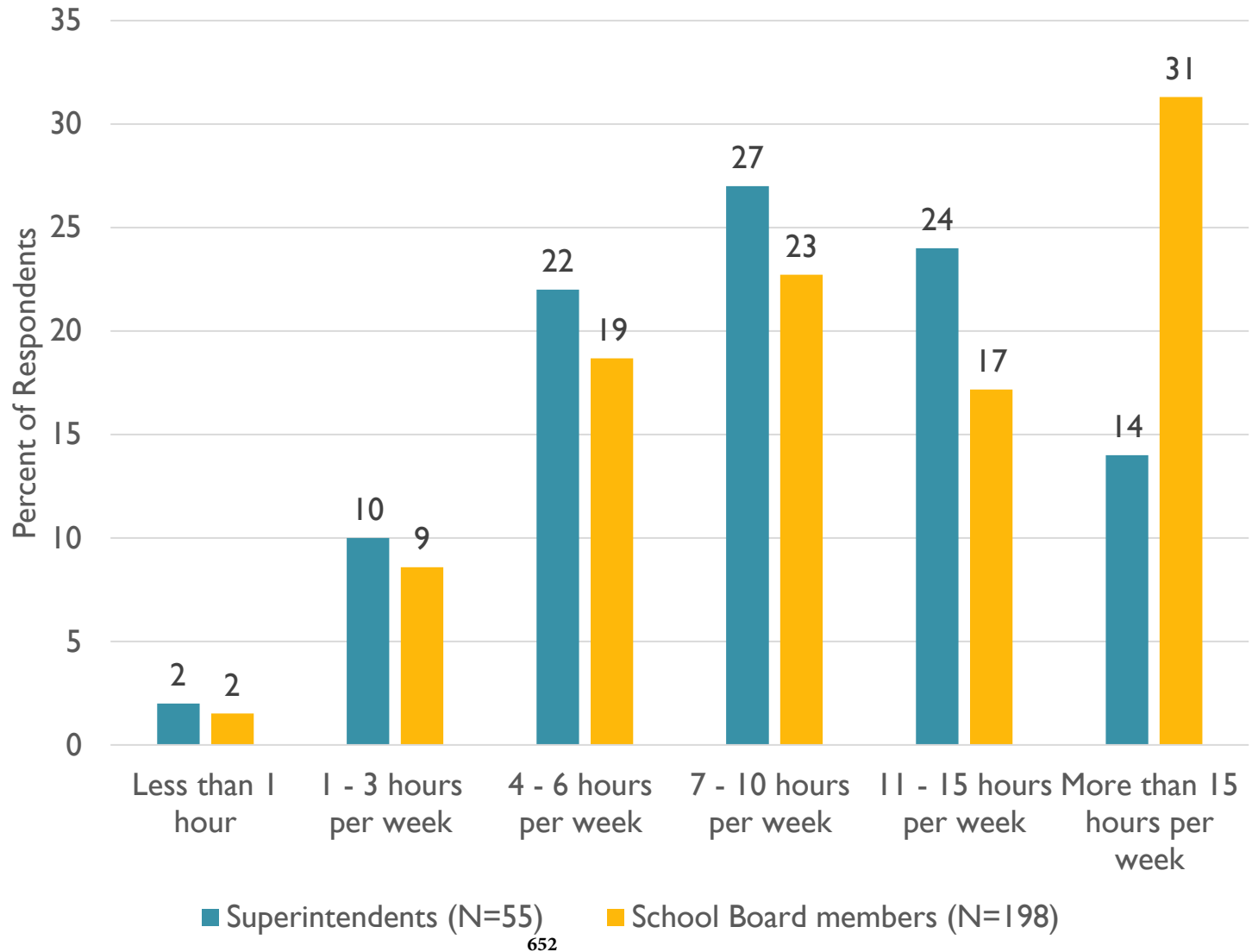


Percentage of Time Devoted to Various Topics During Regularly Scheduled Board Meetings

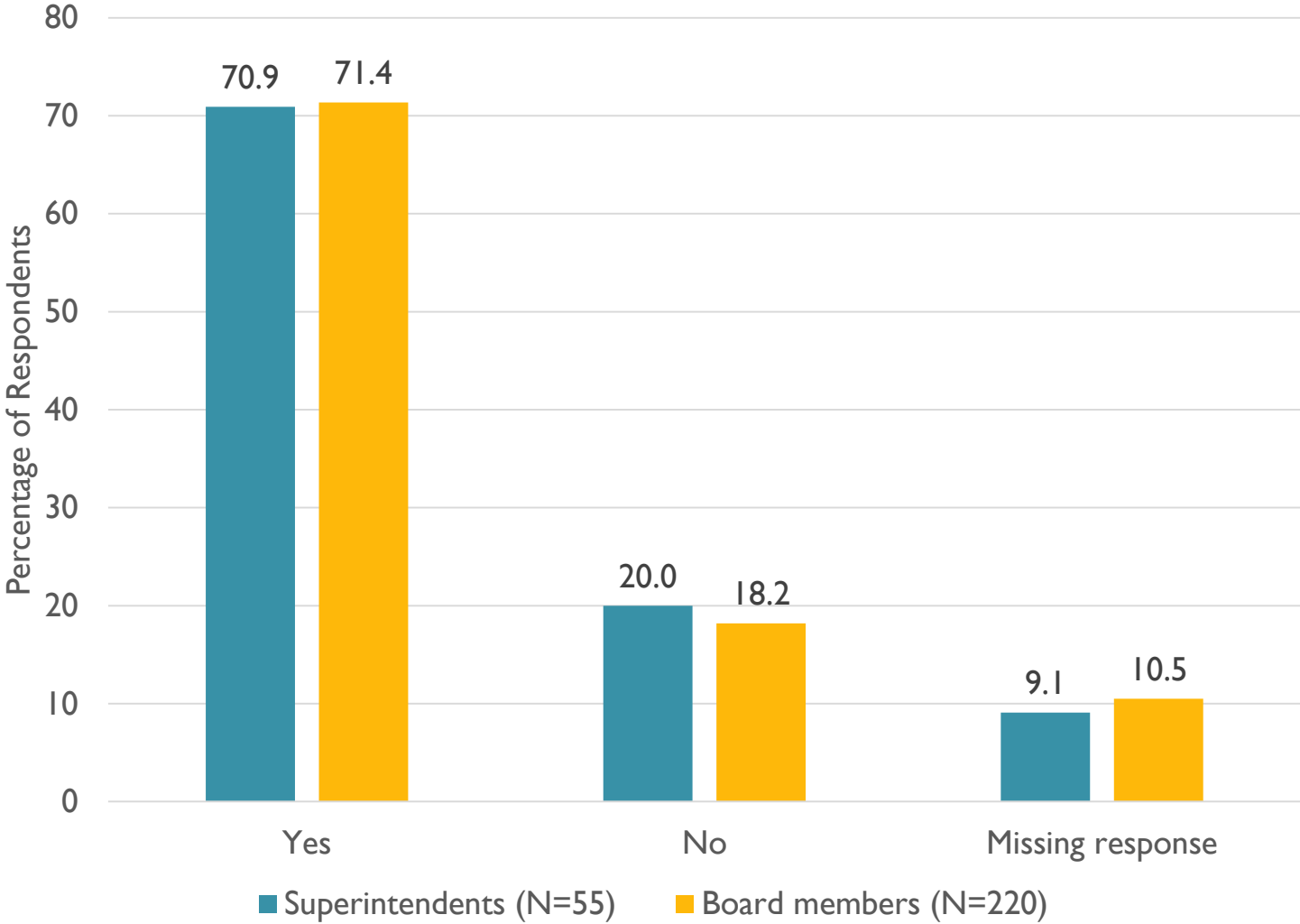
Percentage of time on topics during regularly scheduled board meetings



Average Time Spent on School Board Business Other Than Formal Meetings Each Week

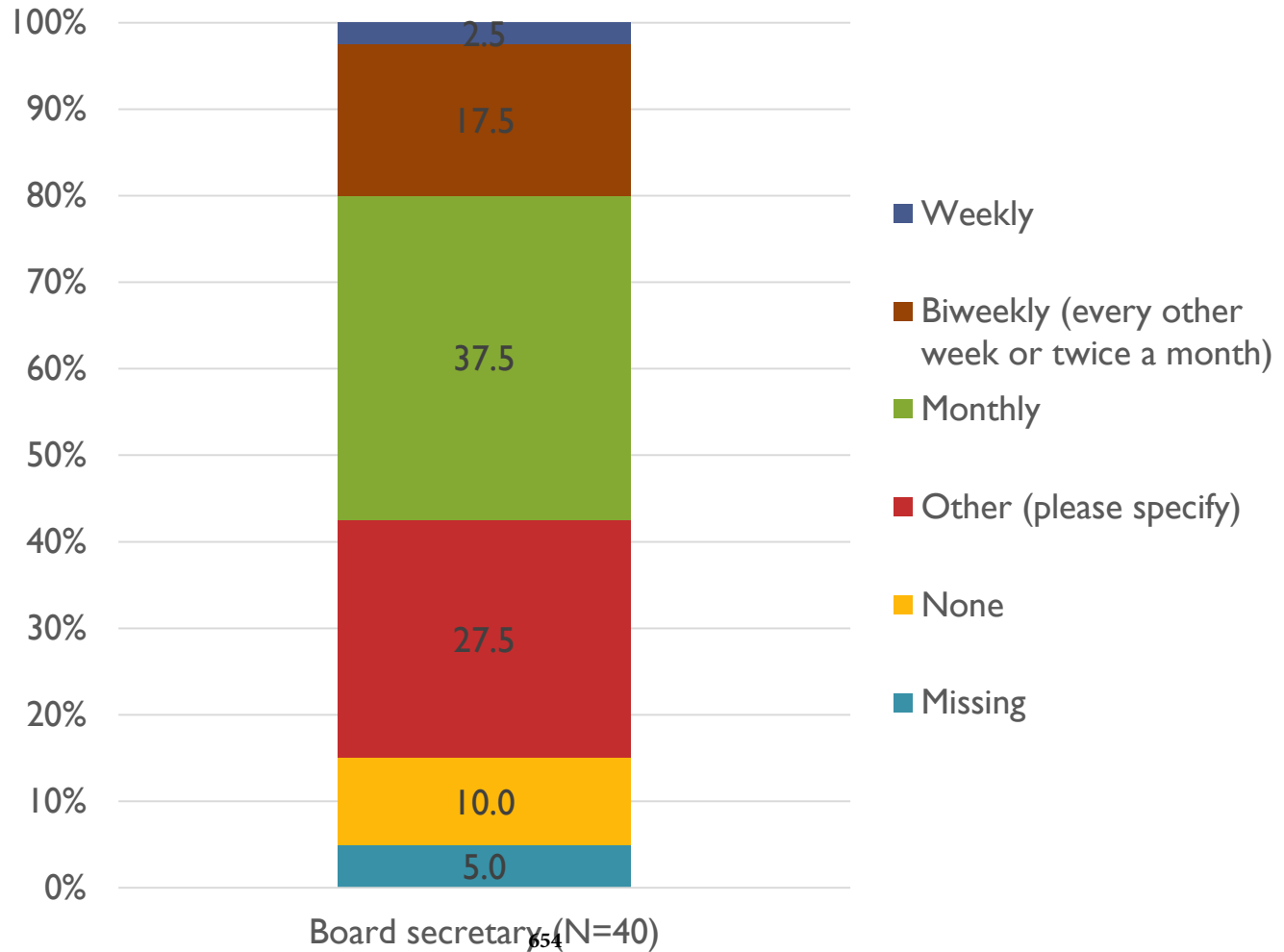


Existence of School Board Work Sessions



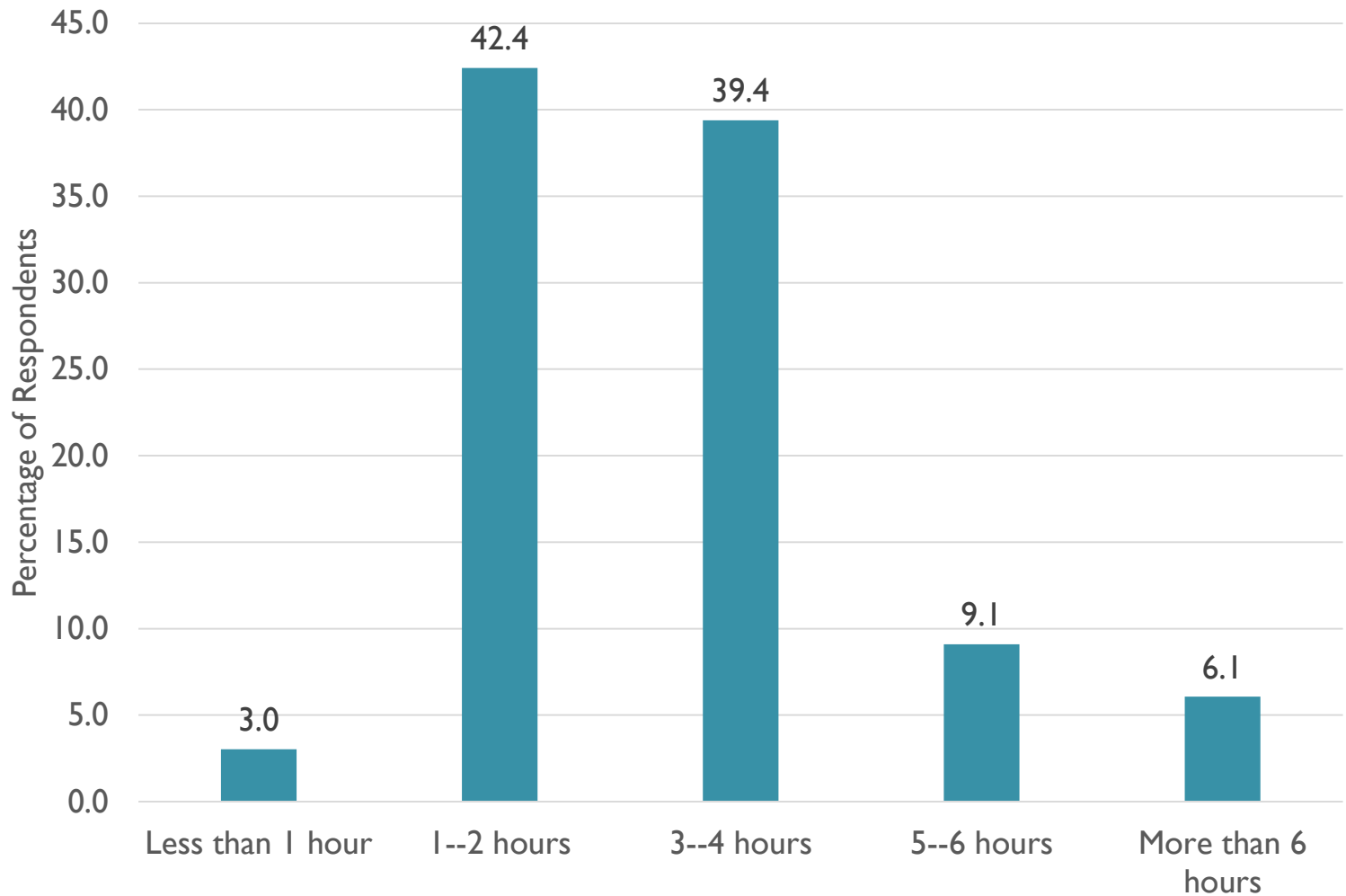
Frequency of School Board Work Sessions

Based on School Board Secretary Responses

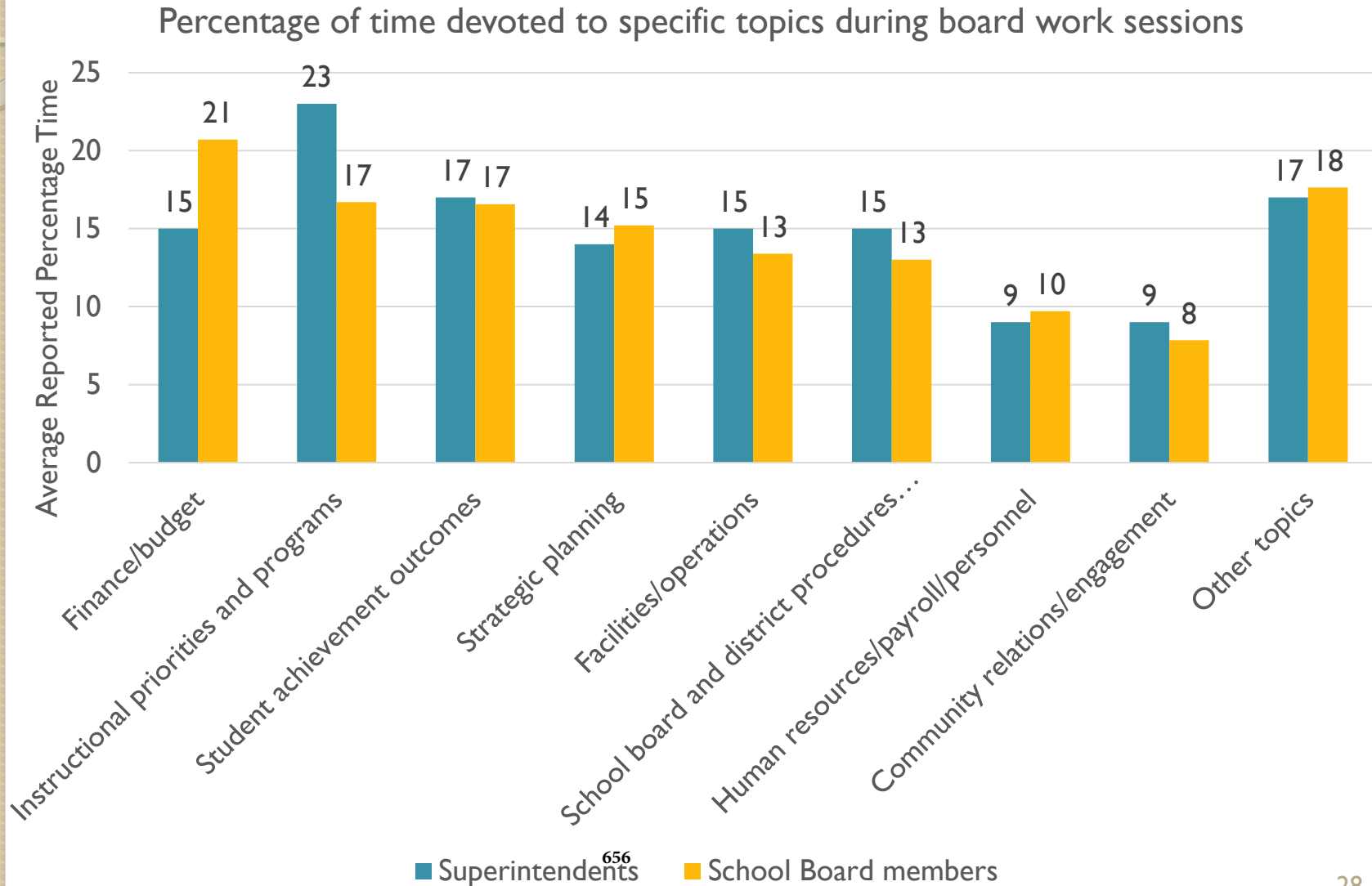


Length of a Typical Board Work Session

Based on School Board Secretary Responses



Percentage of Time Devoted to Specific Topics During Typical School Board Work Sessions



Majority of Time and Energy Continued

- School Board Members Also Noted Spending time on:
 - Budget/Finances
 - Board Policies and Procedures
 - Student Achievement/Academic Performance
- Superintendents Noted that the Board Spends most of its time on:
 - Budget/Finances
 - Student Achievement
 - Constituent Concerns/Issues

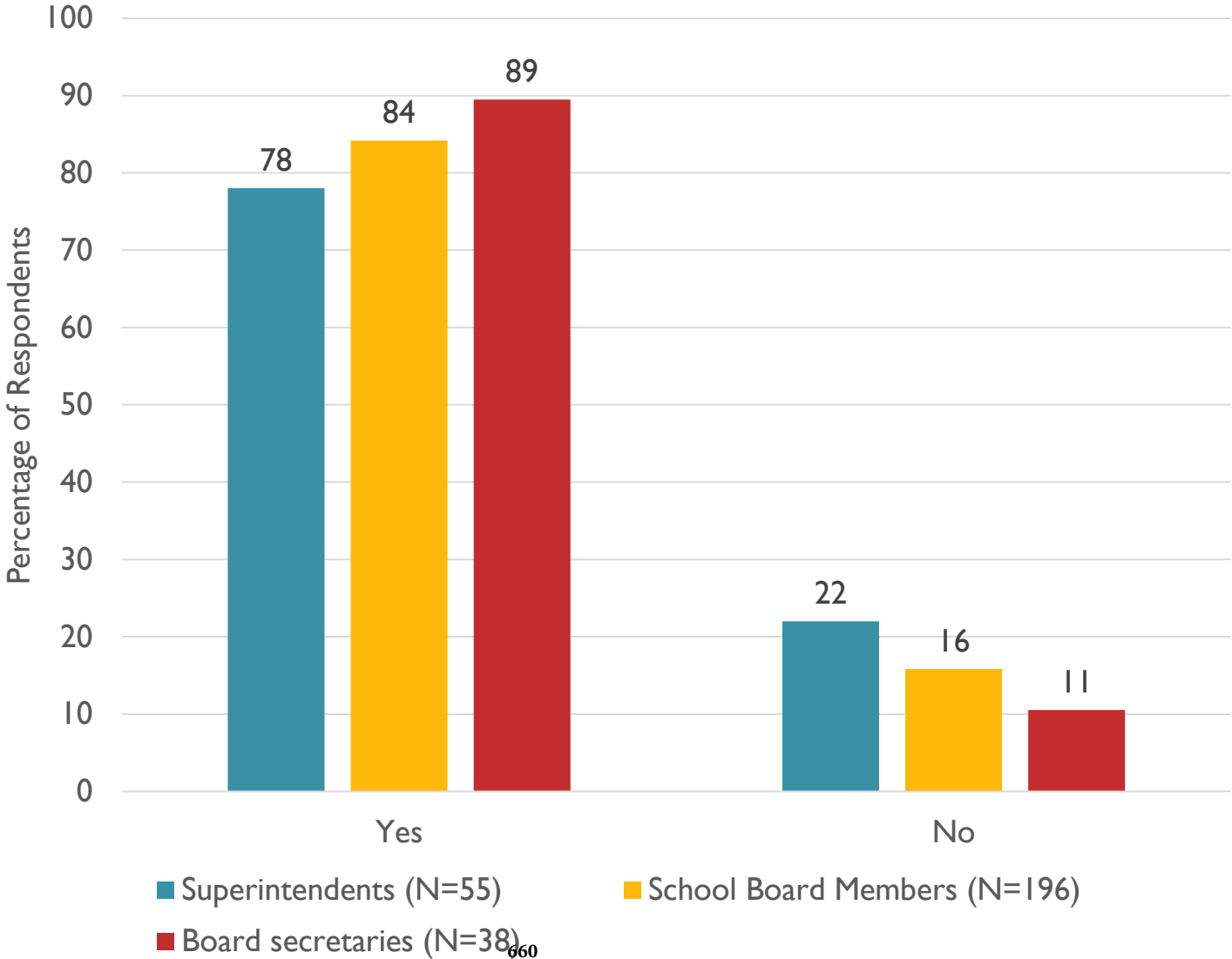
School Board and Superintendent Goals

- School Board Members Stated Their Top 3 Goals for Students were:
 - Closing the achievement gaps
 - Graduation rates
 - Increase Student Achievement on State Assessments
- Superintendents Stated Their Top 3 Goals for Students were:
 - 3rd grade read proficiency
 - Graduation rates
 - Closing the achievement gap

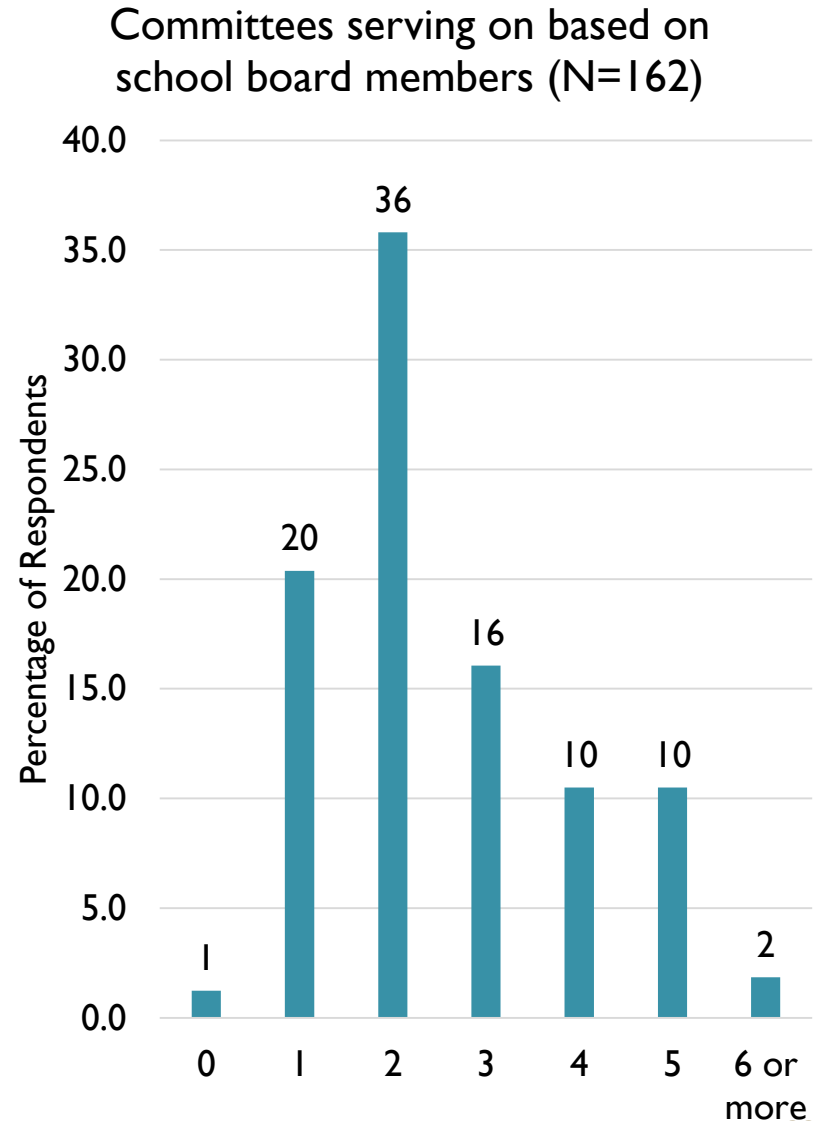
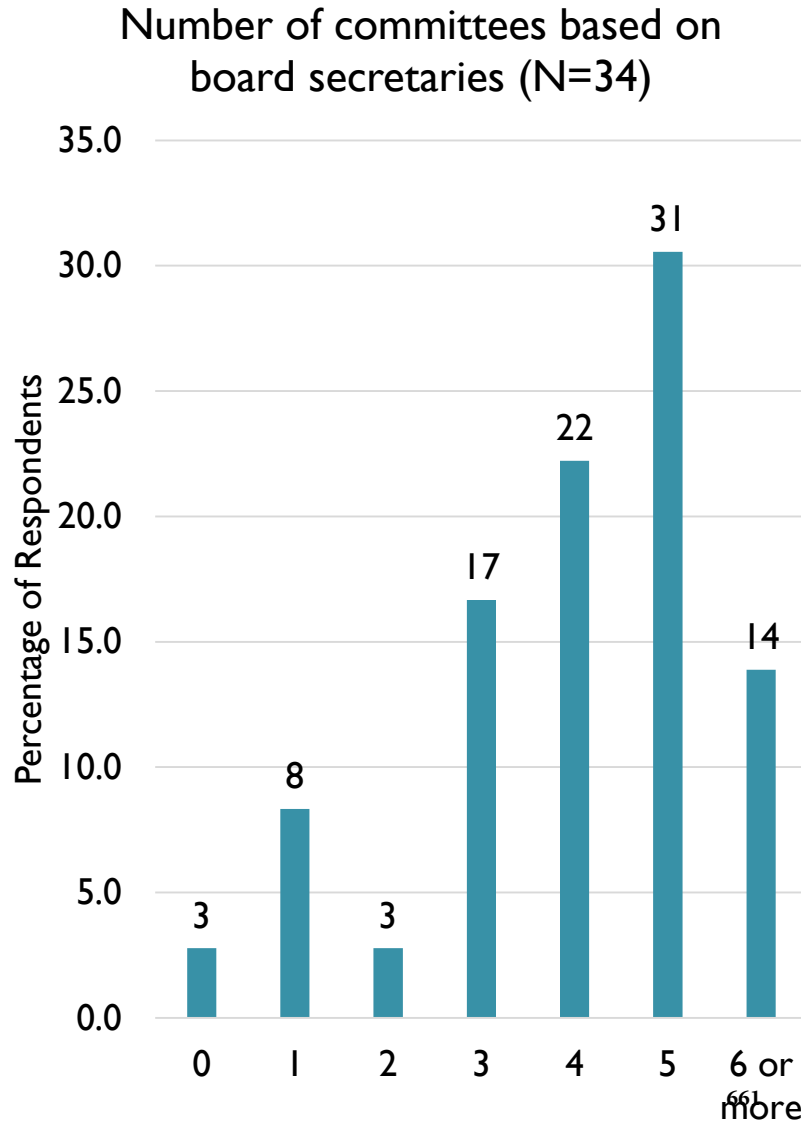
On Boarding and Committees


- Approximately 71% of school board members said that they have an on-boarding process
 - 28 of the 63 board members who stated that they did not have an on-boarding process were from districts where at least one colleague said that they did.
- Of the board members who responded about having an existing committees, 84.2% indicated that they have a structure in place (10.9% of the 220 did not respond).
 - Regarding serving as a committee chairperson, 185 board members responded and 47.6% said “Yes”

Existing Committee Structure



Number of School Board Committees and Number of Committees School Board Members Serve On





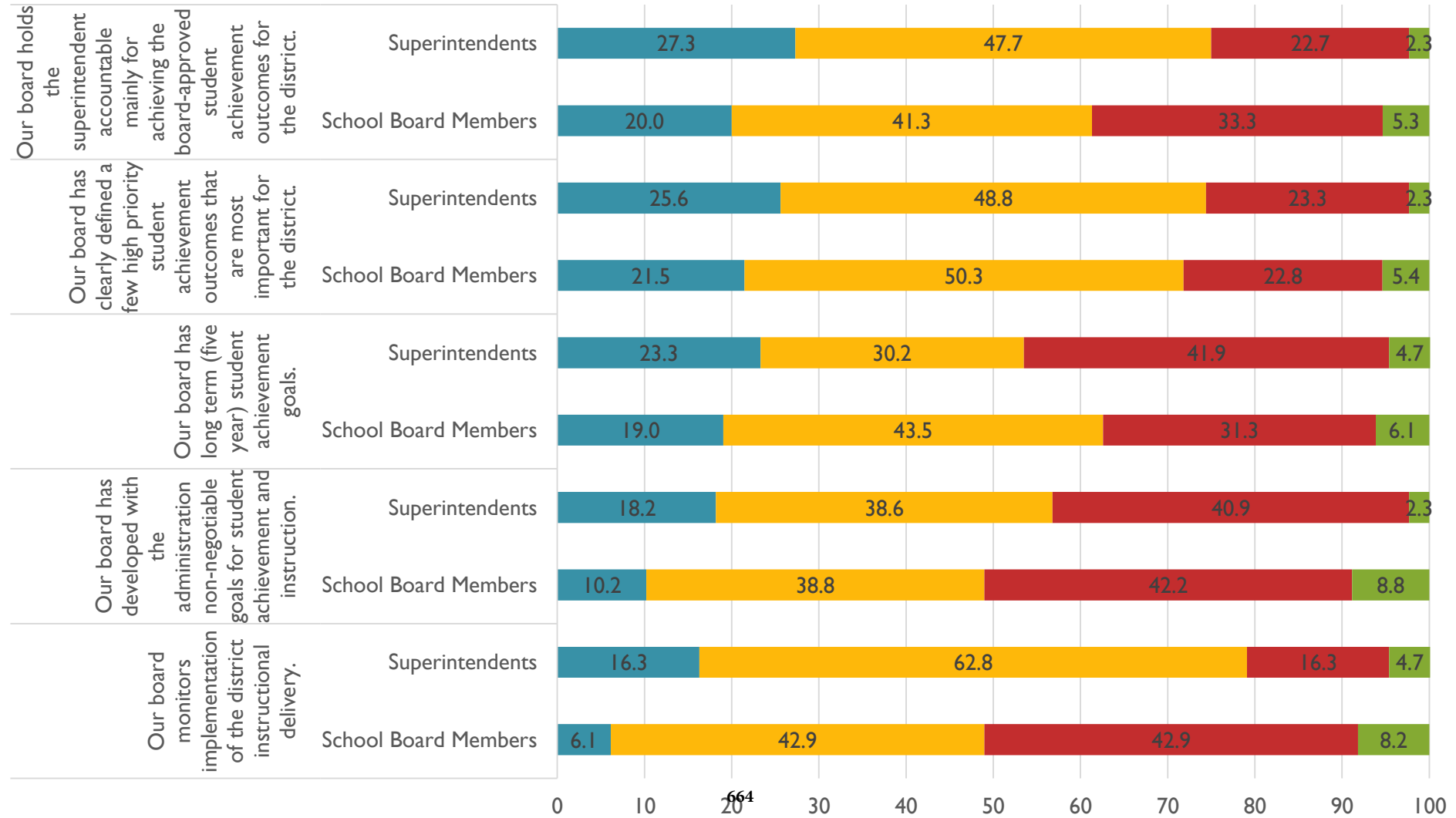
SCHOOL BOARD FOCUS

School Board and Superintendent Goals

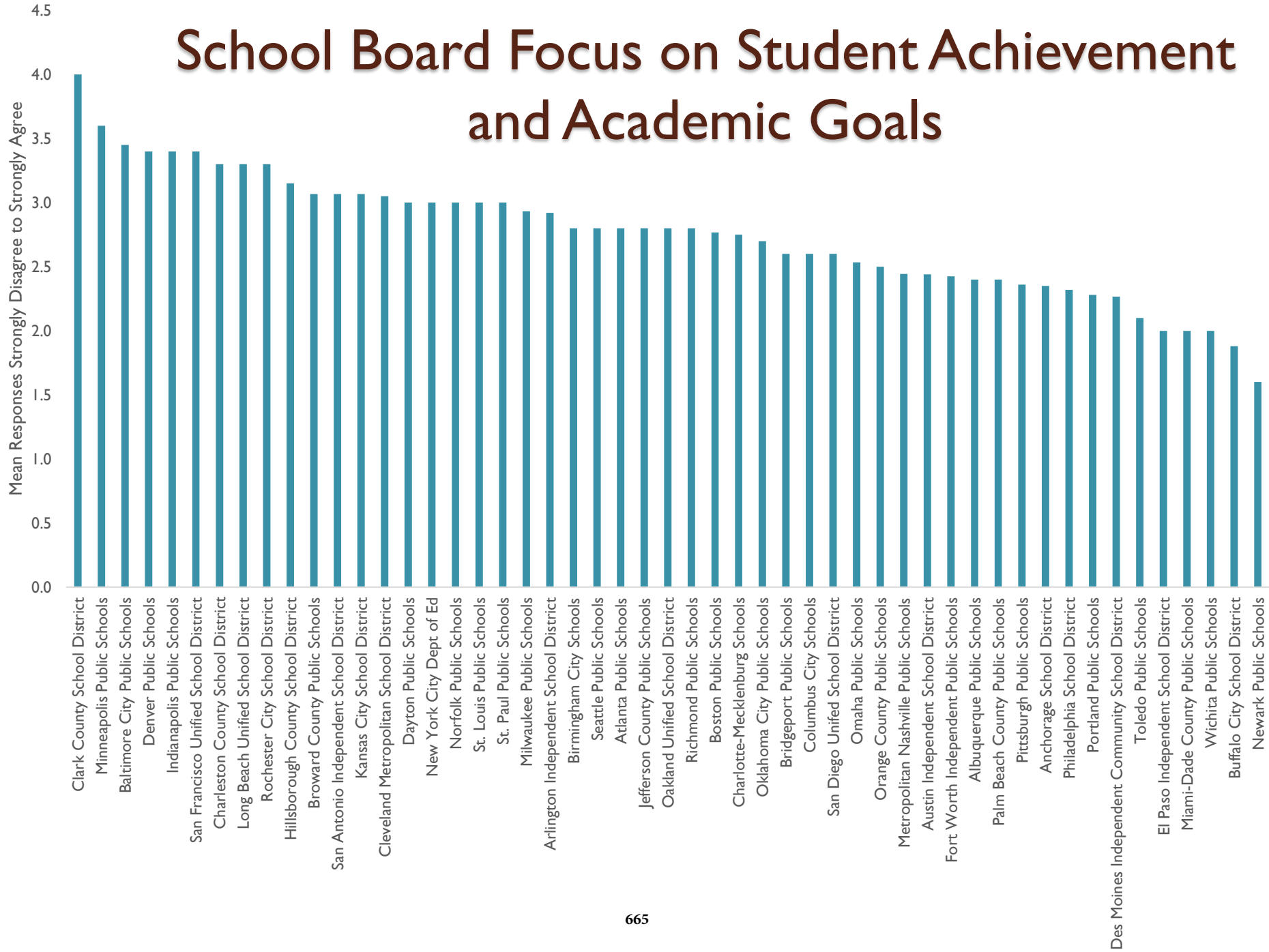
- School Board Members Reported Their Top 3 Goals for Students were:
 - Closing the achievement gaps
 - Graduation rates
 - Increase Student Achievement on State Assessments
- Superintendents Reported Their Top 3 Goals for Students were:
 - 3rd grade read proficiency
 - Graduation rates
 - Closing the achievement gap

School Board Focus on Student Achievement and Academic Goals

■ Strongly Agree
 ■ Agree
 ■ Disagree
 ■ Strongly Disagree

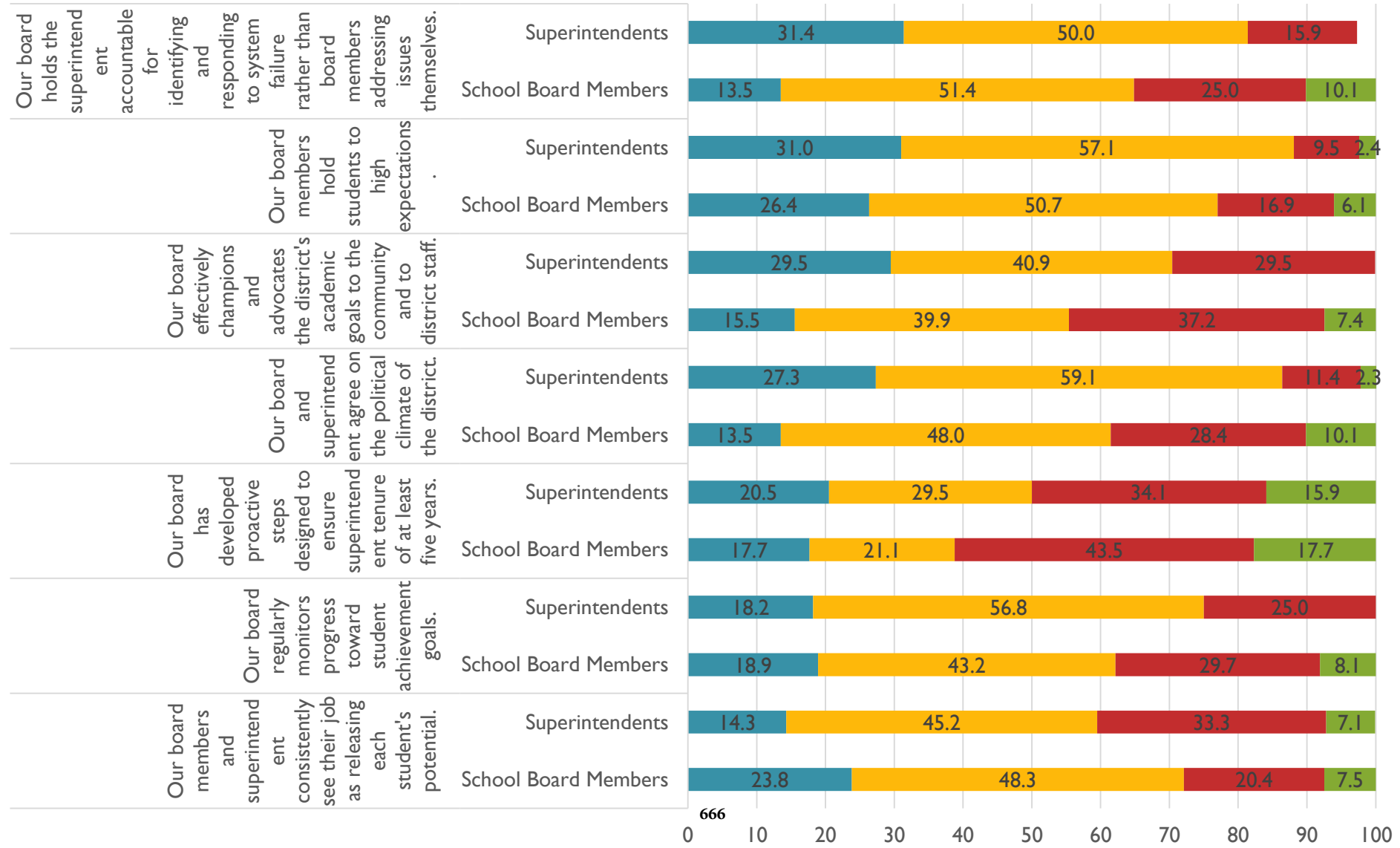


School Board Focus on Student Achievement and Academic Goals



Board Focus on Accountability

Strongly Agree Agree Disagree Strongly Disagree

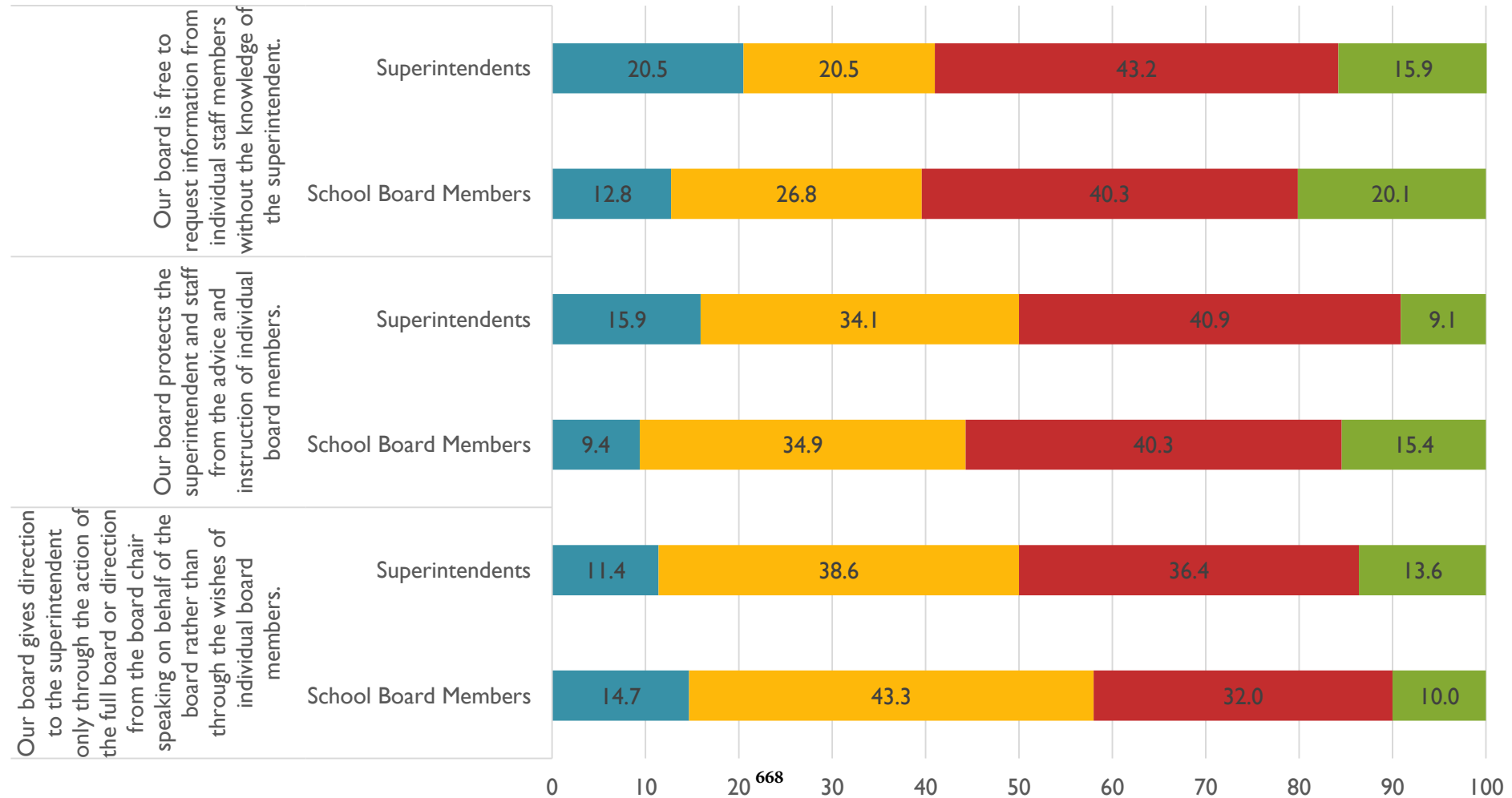


Board Focus on Accountability

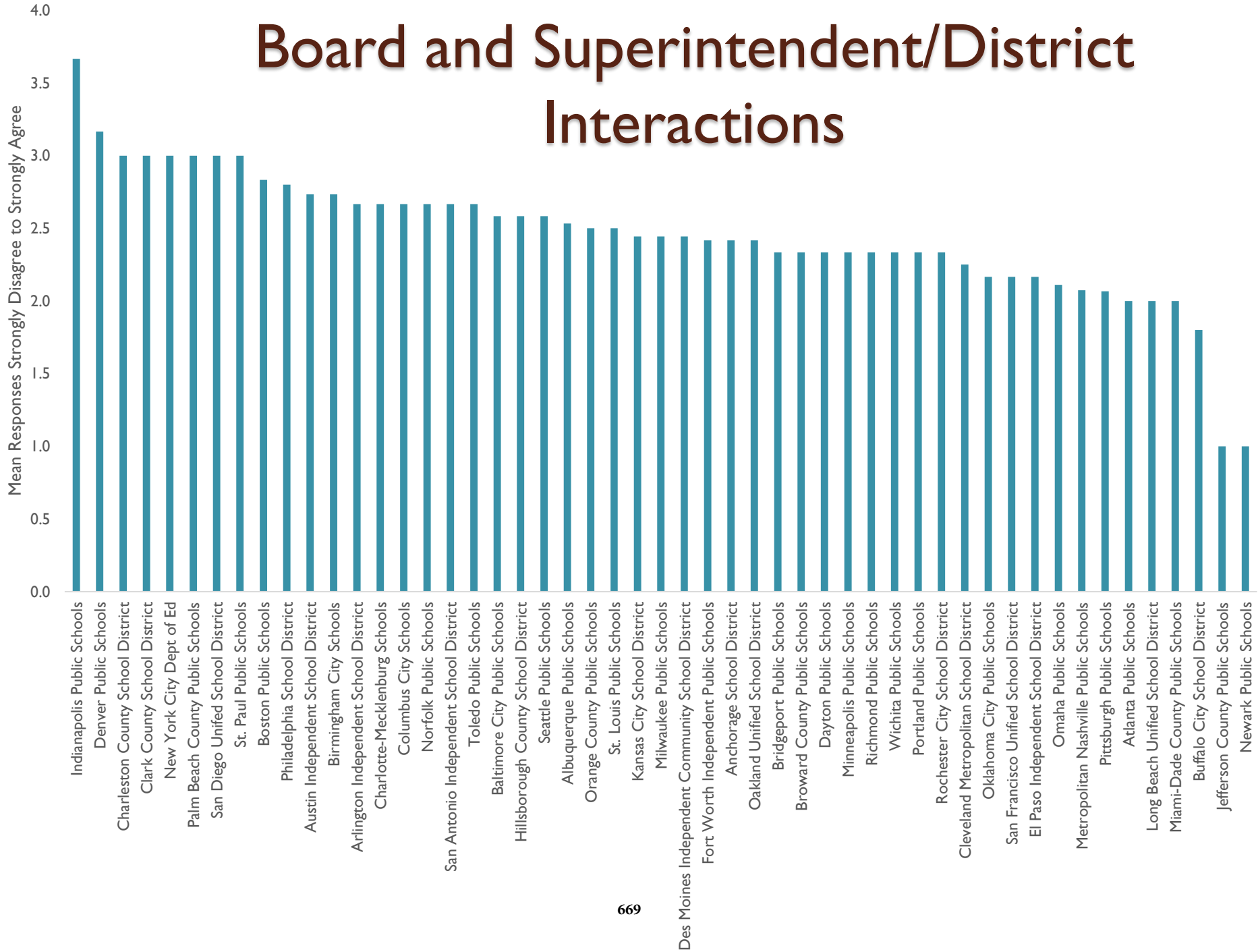


Board and Superintendent/District Interactions

Strongly Agree Agree Disagree Strongly Disagree

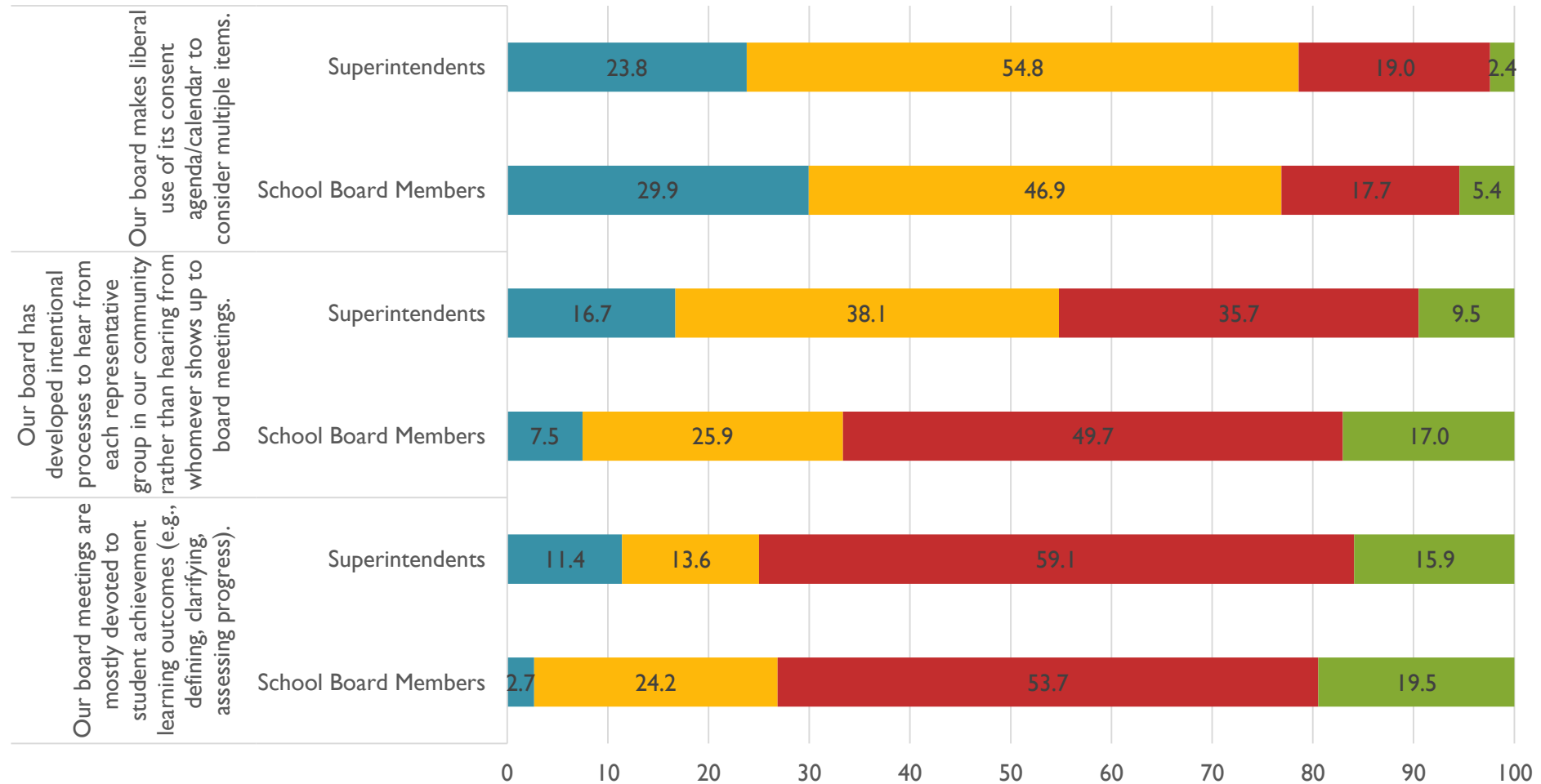


Board and Superintendent/District Interactions

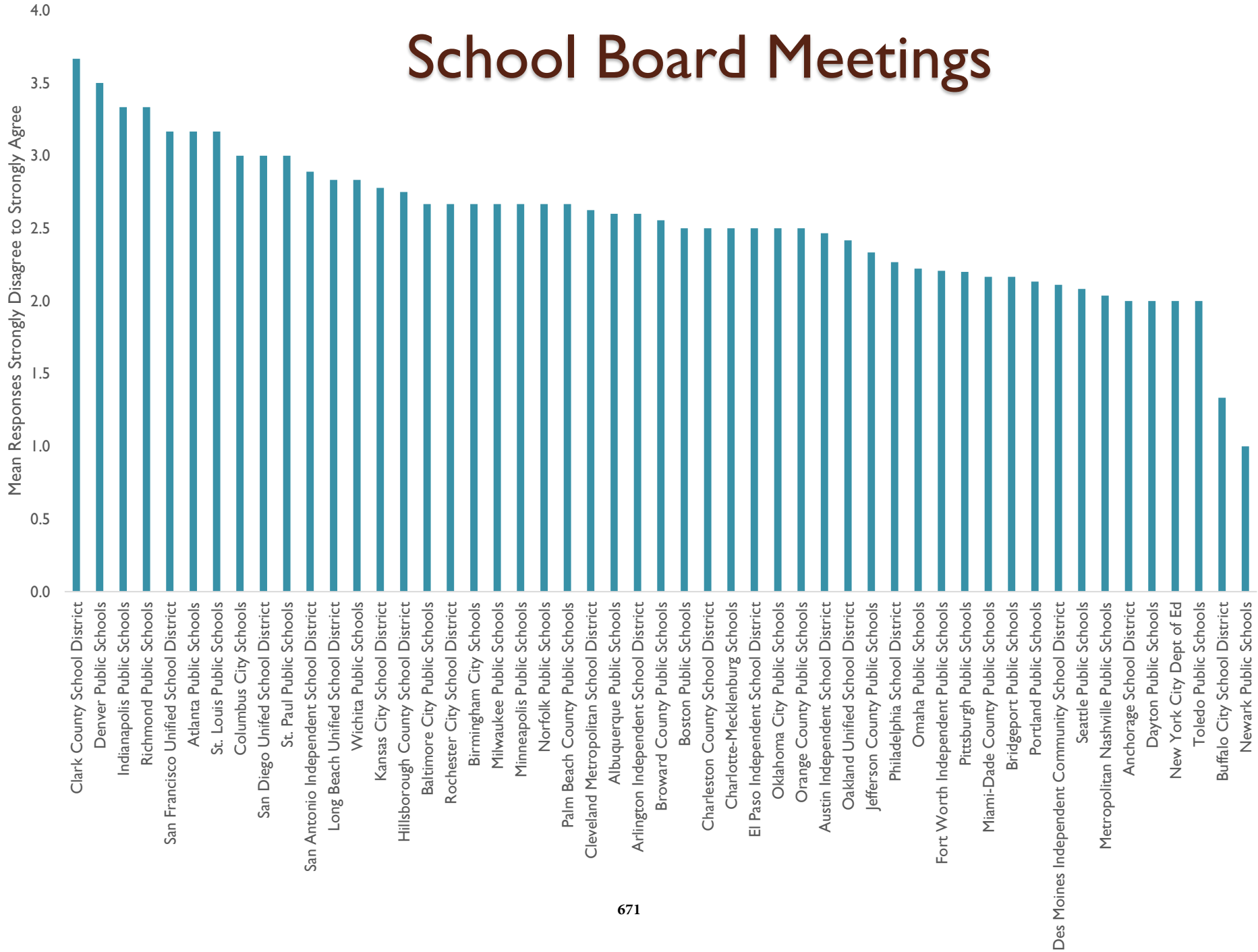


School Board Meetings

Strongly Agree Agree Disagree Strongly Disagree

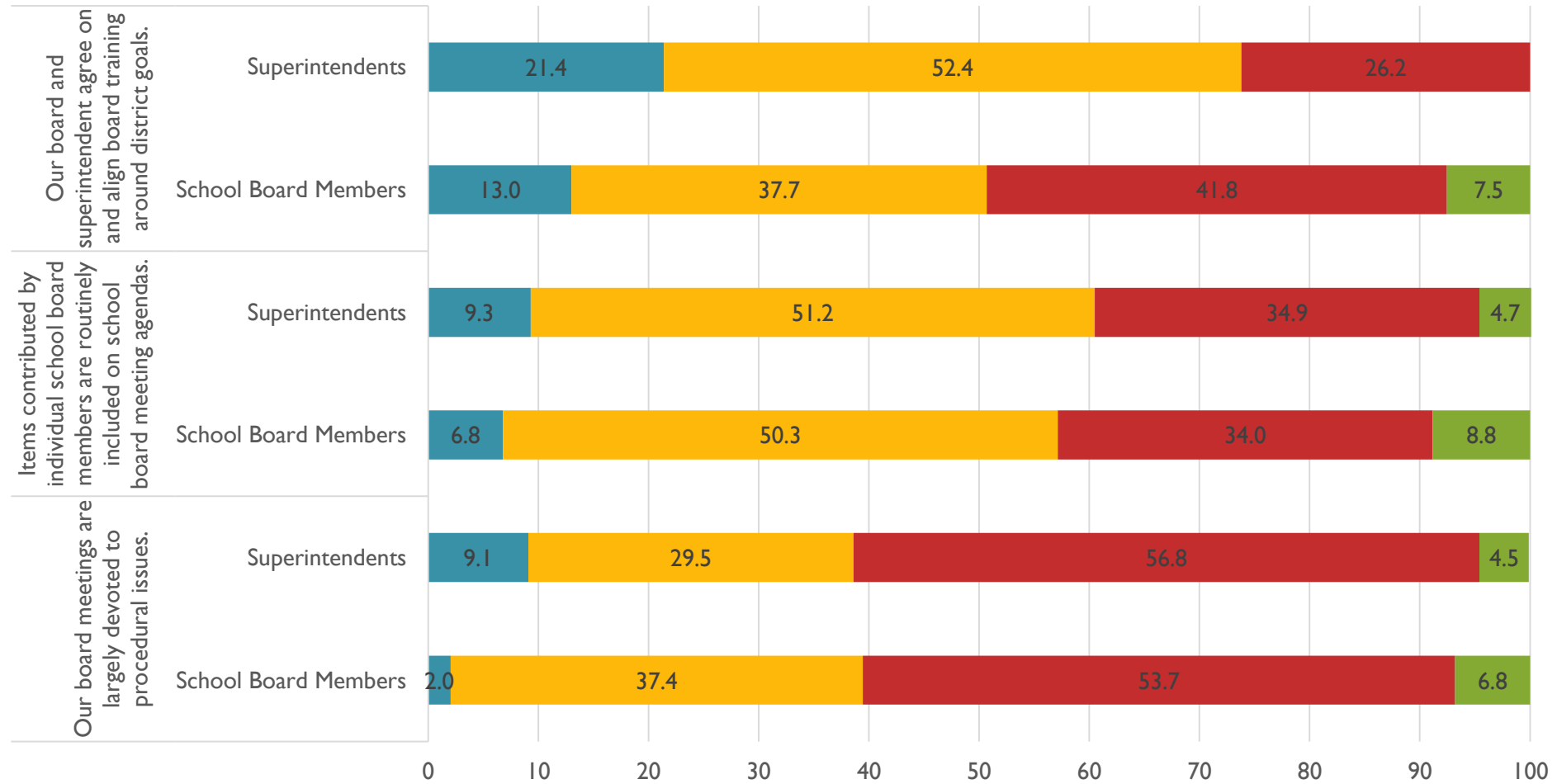


School Board Meetings



School Board Practices

Strongly Agree Agree Disagree Strongly Disagree

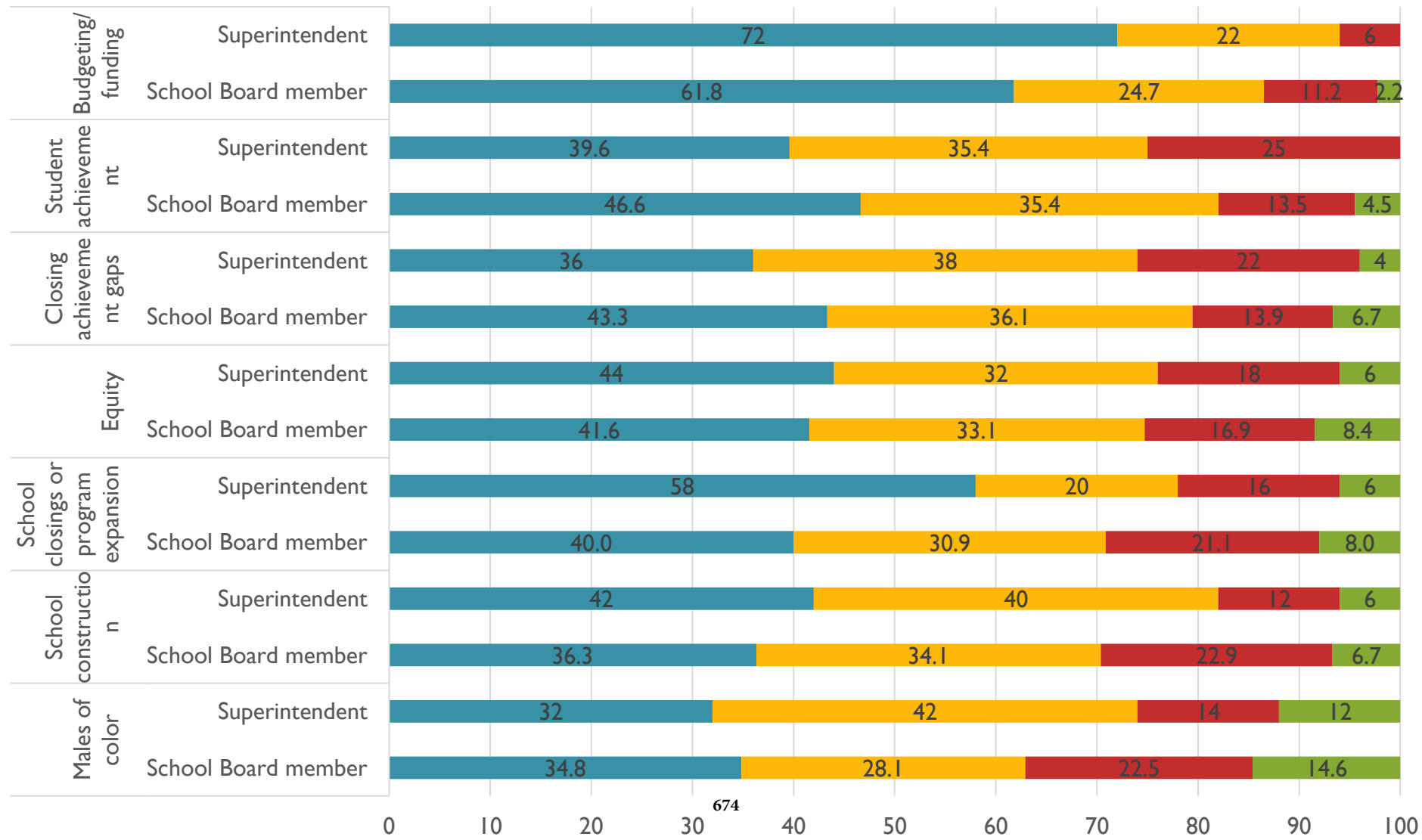


School Board Practices



School Board Engagement in Various Topics (I)

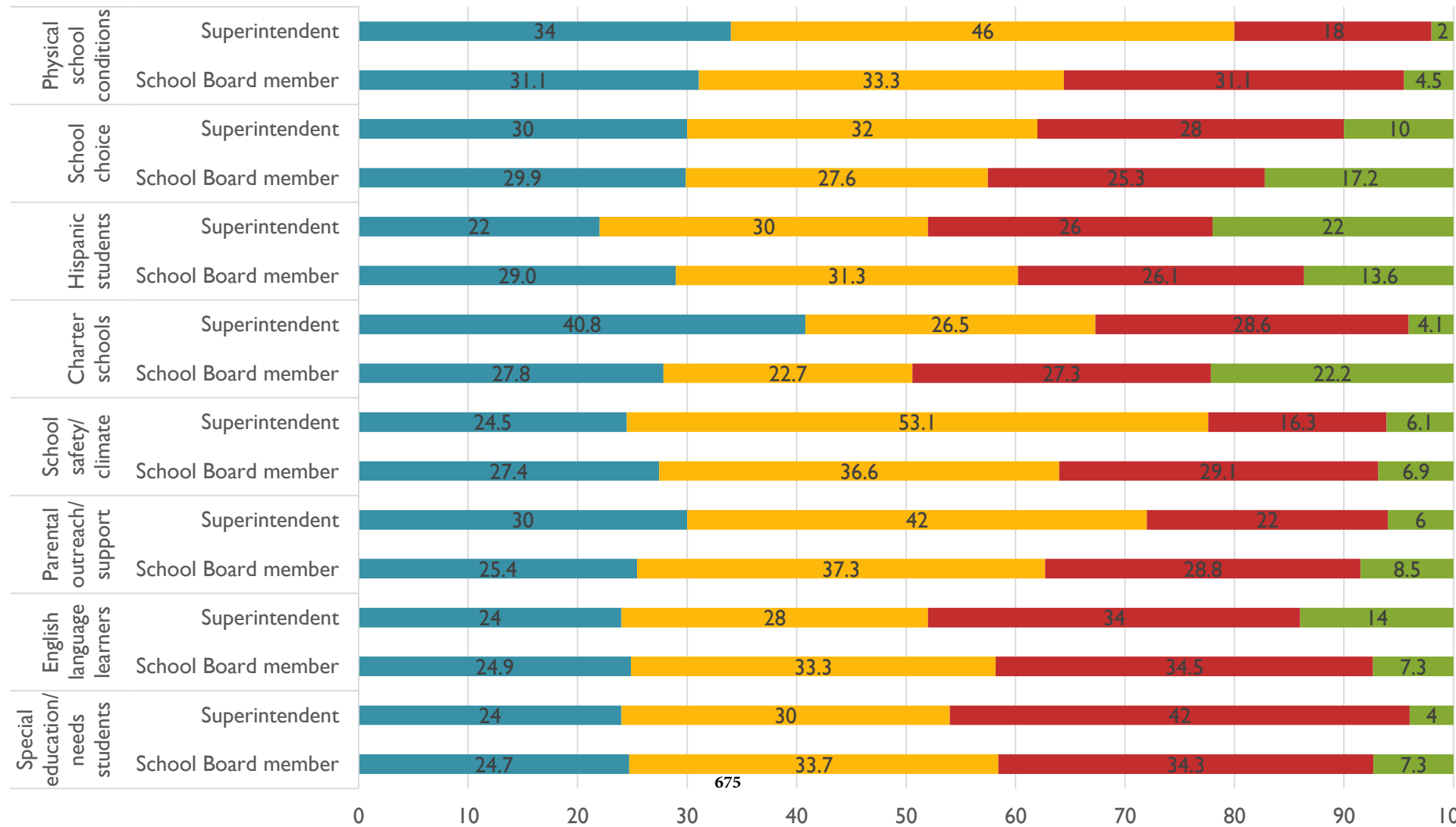
■ Significantly engaged
 ■ Moderately engaged
 ■ Slightly engaged
 ■ Not at all engaged



School Board Engagement in Various Topics (II)

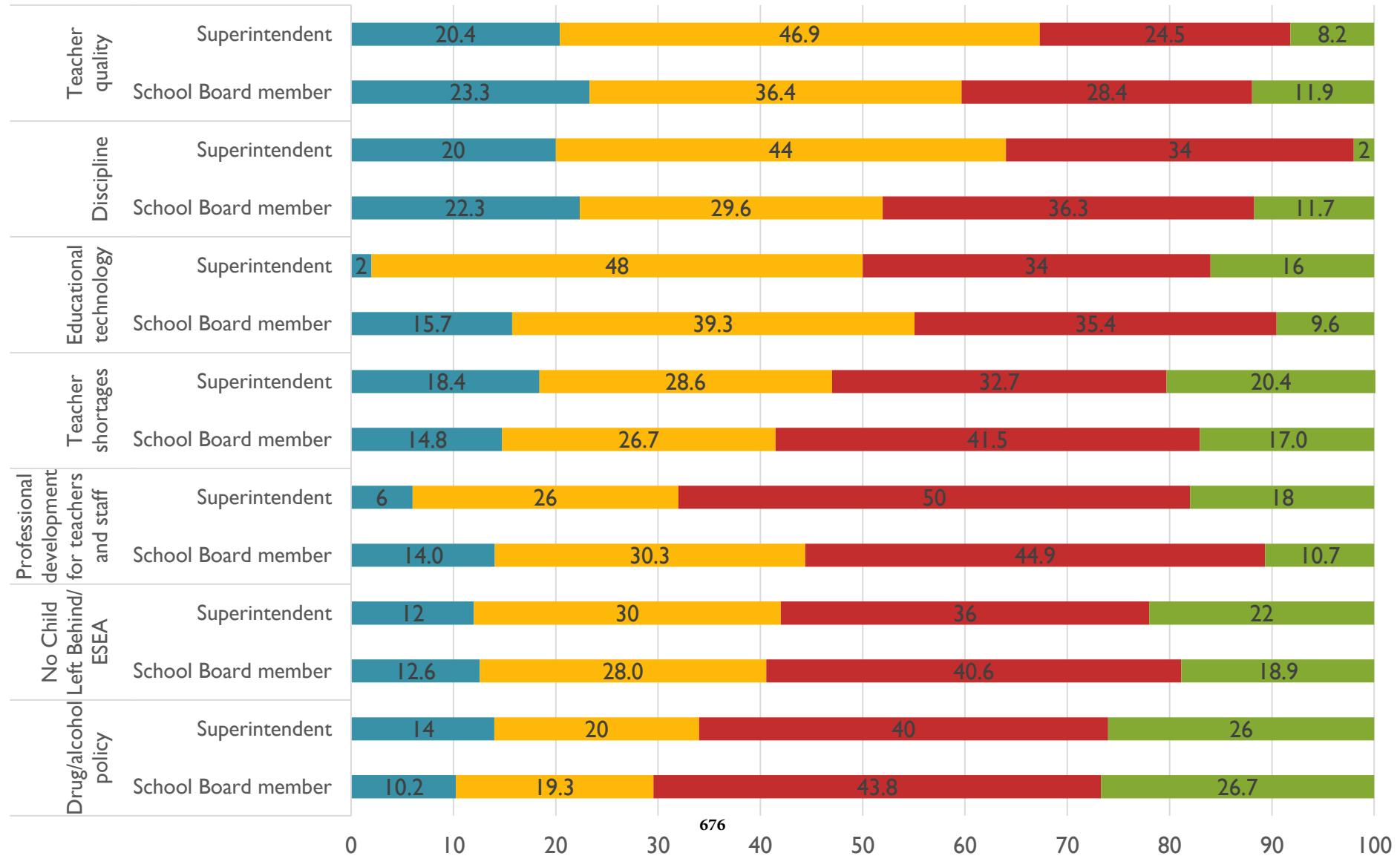
Board engagement in topics of interest

■ Significantly engaged ■ Moderately engaged ■ Slightly engaged ■ Not at all engaged



School Board Engagement in Various Topics (II)

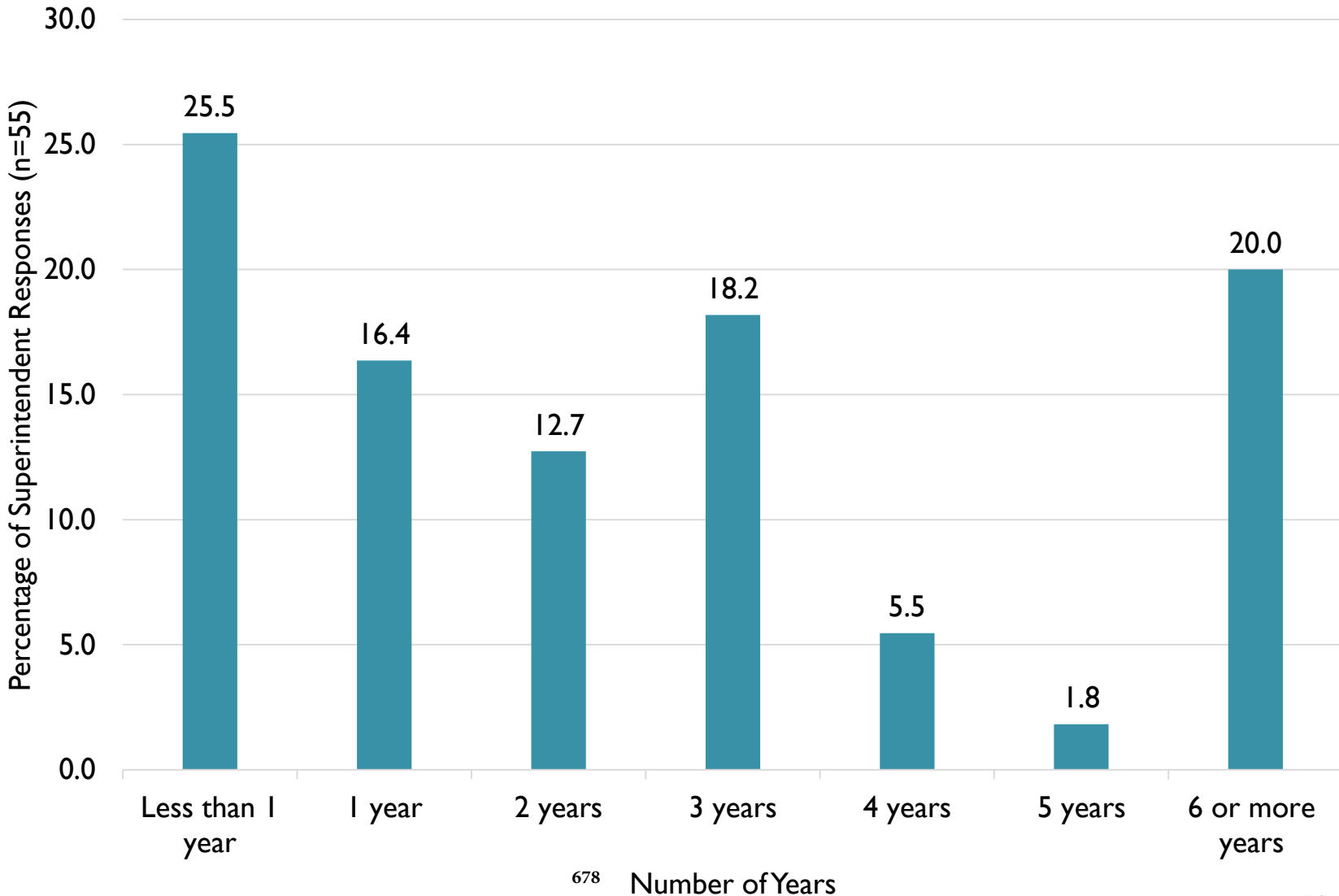
■ Significantly engaged
 ■ Moderately engaged
 ■ Slightly engaged
 ■ Not at all engaged





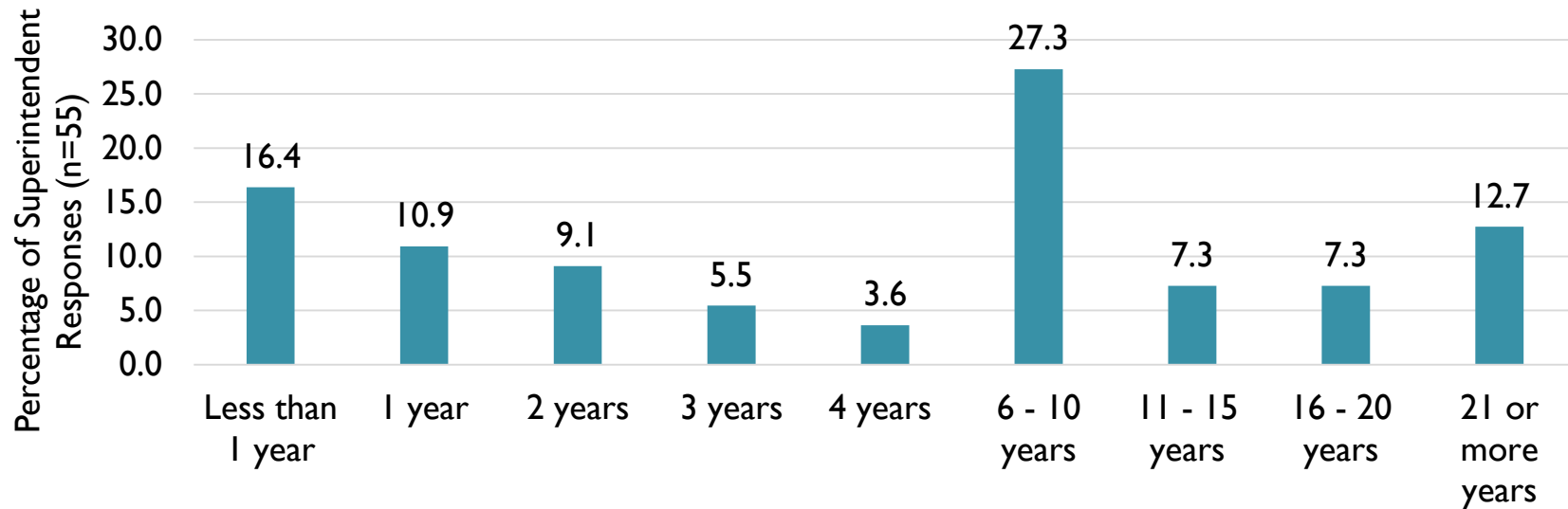
SUPERINTENDENT TENURE

Number of Years Serving as Superintendent in Current District

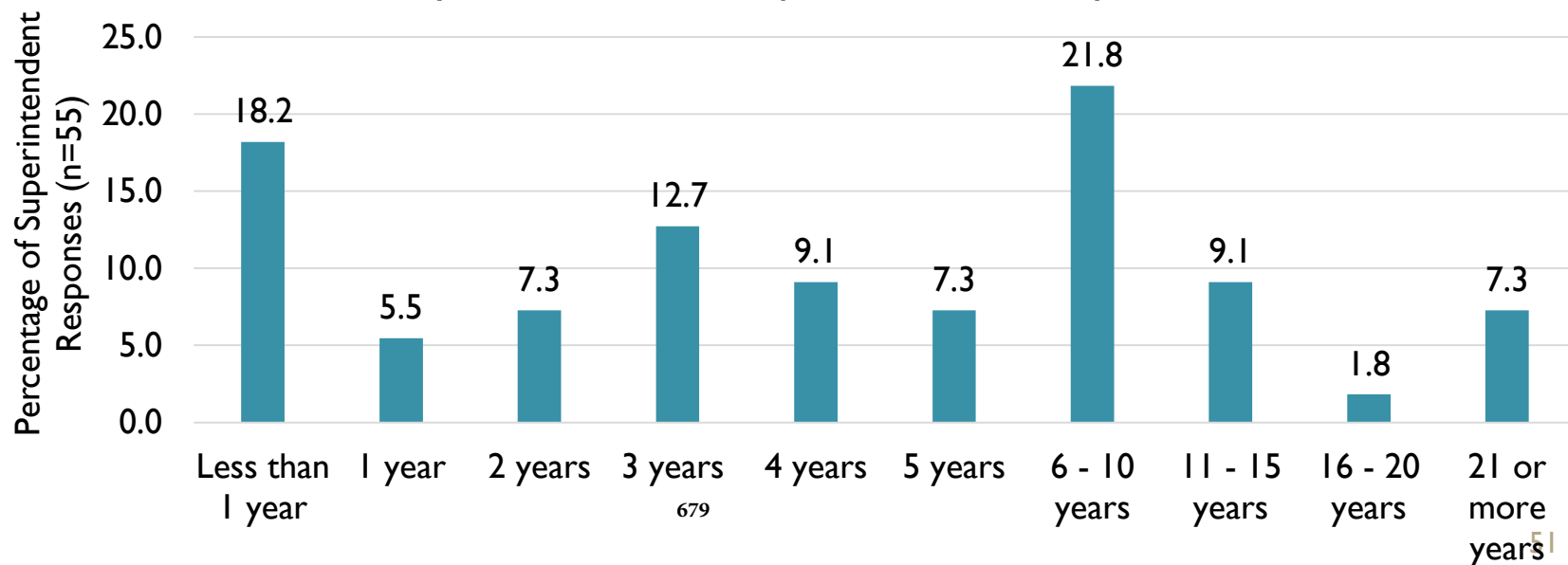


Service Of Superintendent - Overall

Total Years Served in Your Current District

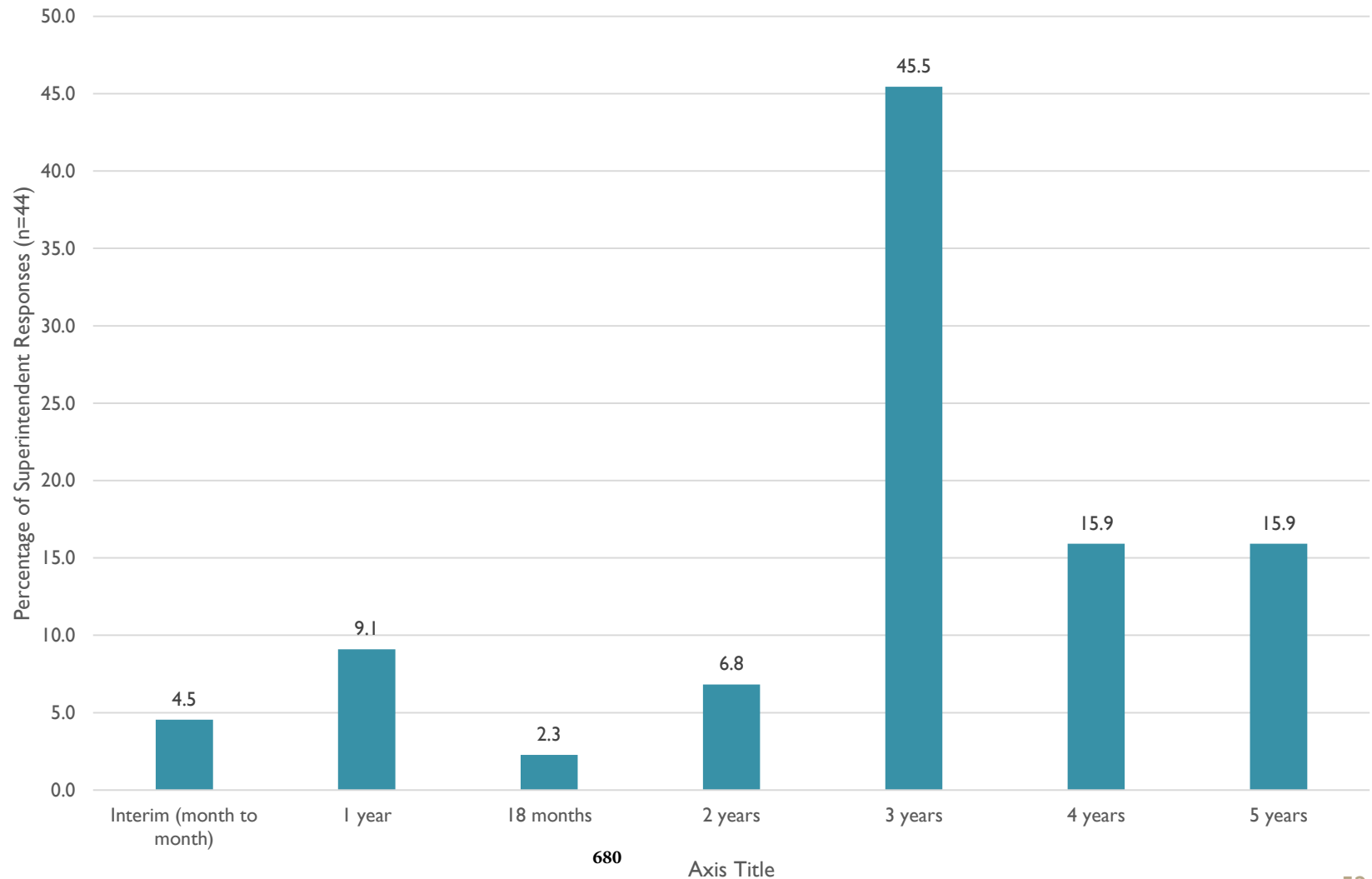


Total years served as a superintendent in any district



Length Of Current Superintendent Contract

Based on Superintendent Survey Respondents



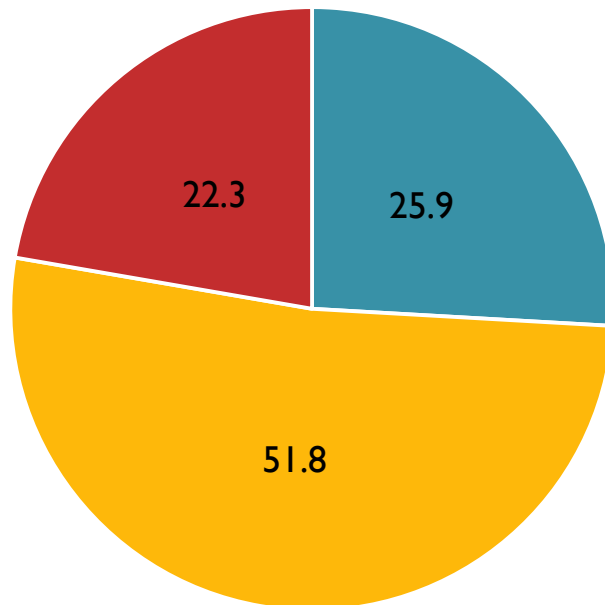
Superintendent Tenure and Evaluation

- The tenure of the average current superintendent is about 2.69 years and full tenure of the previous two superintendents was an average of 3.79 years and 4.35 years, respectively.
- 143 school board members reported that their last superintendent review was conducted about 8.71 months ago--with a range of one month to 48 months

Superintendent Evaluations Using Research-Based Rubric and Exit Interviews

Percent of Superintendent Evaluations with Rubric

Based on School Board Member Responses

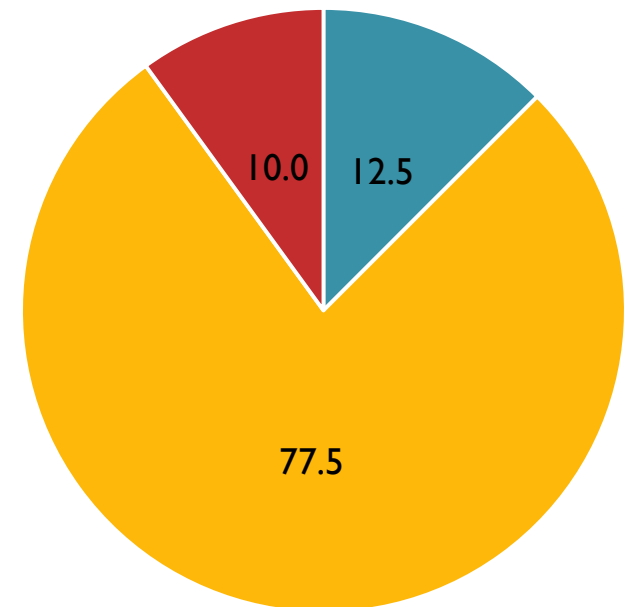


■ Yes ■ No ■ Missing

682

Percent of exit interviews conducted when superintendent leaves

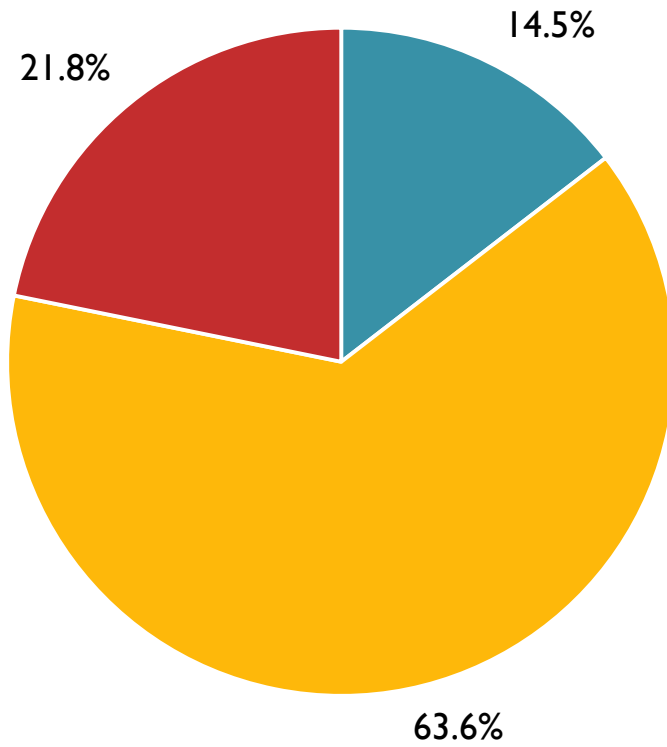
Based on Board Secretary Responses



■ Yes ■ No ■ Missing

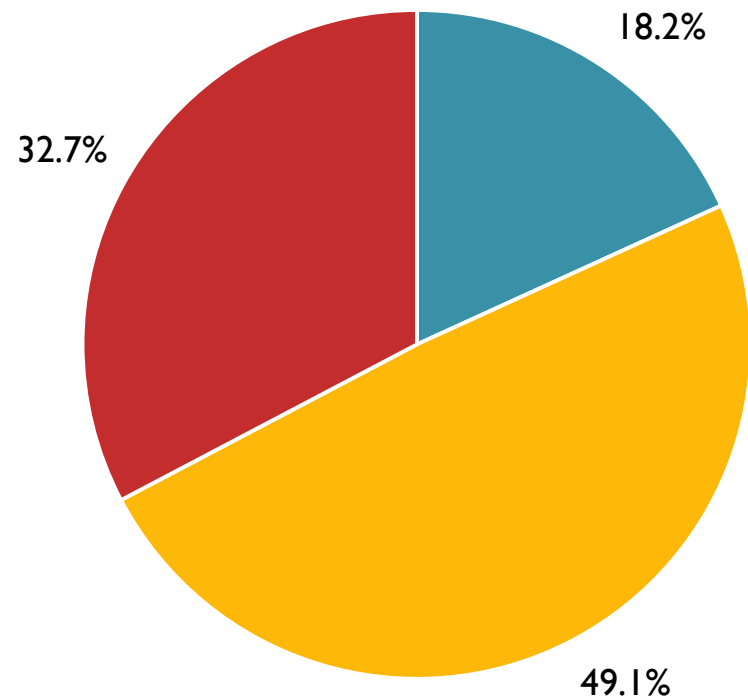
School Board Succession Plan for the Superintendent and Staff

Based on Superintendents' Responses



■ Yes ■ No ■ Missing response 683

Based on School Board Members' Responses



■ Yes ■ No ■ Missing response

KPI

Dear Colleagues:

We are pleased to announce that the surveys for the Council of the Great City Schools' KPI Project are now available for FY 2014-15 data. These surveys are part of a major initiative by the Council to collect and benchmark key performance indicators (KPIs) on the business operations of urban school districts. The surveys are part of a complete Performance Management System that can be used to measure performance, achieve efficiencies and improve effectiveness.

If you have participated in this survey before, we encourage you to continue updating your data for the most recent fiscal year, so that you can take advantage of the data trending features available in the system. If you have not ever participated in this survey, please contact Jon Lachlan at jlachlan@cgcs.org or email kpisupport@transact.com for information about obtaining a username and logging in to the system.

Because there are 14 surveys, it may be helpful to assign a person to coordinate the collection of data. If you do so, please let me know.

In this email we have included the following:

- Attached is a timeline of the survey cycle. We will be sending periodic reminders and participation reports. We are targeting **March 25** as the tentative date when we will release full results, with benchmarks. The primary survey period will go through **April 27**, after which your data might not appear in the Council's *Managing for Results* report.
- Also attached is a prepared report with your district's multi-year trends as they compare to the quartiles. This should be useful for quickly identifying performance trends in your data.
- Below is a list of the KPI survey sections and general themes.
- Further below is a list of changes to the KPIs as of this year. Namely, we have removed several KPIs that were not being widely utilized.

You may access the online surveys by logging in to the system at

<https://kpi.actpoint.com> using your email address and password. For your convenience, you can download a PDF copy of the surveys from the ActPoint KPI website <https://kpi.actpoint.com>. To do this, click Get Started -> View Surveys, click Start Survey, then click Export Survey -> Download PDF. However, at some point your team will need to enter the data online. Again, if you do not yet have a login, please contact Jon Lachlan at jlachlan@cgcs.org or email kpisupport@transact.com. (You may also request a login for other Directors or analyst staff that would benefit from having access to this tool.)

Thank you,
Bob Carlson, Director of Management Services
Council of the Great City Schools

Jon Lachlan, KPI Support
Council of the Great City Schools

LIST OF SURVEYS

GENERAL

Demographics – General student counts, number of days in the school year, total budget by category, total number of staff by category.

FINANCE

Accounts Payable – Department staffing and costs, number of invoices, processing methods, processing time and invoice payments voided/reversals.

Cash Management – Treasury staffing and costs, total investment figures, cash-flow and short-term borrowing.

Compensation – Payroll department staffing and costs, number of pay checks, W-2 corrections, staff overtime, and self-service usage.

Financial Management – Adopted and amended budget totals, fund balance, debt information and financial statement publication time.

Grants Management – Total grant expenditures, competitive grants,

returned funds, days to access, grant-funded staff, grant expenditure aging, and grant budget amendments.

Procurement – Department staffing and costs, total purchasing, p-card usage, administrative lead time, competitive purchasing, cooperative purchasing, procurement savings, strategic sourcing, M/WBE sourcing, and warehousing.

Risk Management – Liability insurance, workers' compensation insurance, and workplace incidents

OPERATIONS

Food Services – Meal sites, meal counts, revenue, expenditures, labor hours, ServSafe certification, meal accountability, Provision II, and breakfast access.

Maintenance & Operations - Building types, staffing, deferred maintenance, utility usage, recycling, green buildings, and costs for custodial work, routine maintenance, major maintenance, rehab/renovations and new construction.

Safety & Security – Staffing and costs, incident counts, equipment, intrusion/burglary alarms, safety plans, training hours, crisis response teams, metal detectors, and health/safety inspections.

Transportation – Bus counts, ridership, public transit, department and operating costs, daily runs, equipment and accessories, bus miles, average bus age, fuel discounts, on-time performance, student placement time, ride time, accidents and incidents, bus inspections, and staffing.

HUMAN RESOURCES

HR – Budget, retention, turnover, exit interviews, teacher credentials, vacancies, substitute placements, employee relations, employee benefits

INFORMATION TECHNOLOGY

IT – Staffing and costs, device counts, computer age, online courses, help desk/support, bandwidth, and system downtime.

LIST OF CHANGES TO KPI COLLECTION:

Removed: Months Below Liquidity Baseline

Removed: Days to Publish Annual Report

Removed: Budget Amendments

Removed: Deferred Maintenance - Percent of Projects Completed

Removed: Deferred Maintenance - Average Cost Per Project

Removed: Deferred Maintenance resulting in Break Downs

Removed: Construction Contracts Awarded

Removed: HR Staff - Benefits

Removed: HR Staff - Compensation

Removed: HR Staff - Employee Records and Staffing

Removed: HR Staff - Employee Relations

Removed: HR Staff - Employee Service Center

Removed: HR Staff - HR Information Systems

Removed: HR Staff - Labor Relations

Removed: HR Staff - Payroll

Removed: HR Staff - Recruitment

Removed: HR Staff - Risk Management

Removed: HR Staff - Training and Development

Removed: HR Staff per HR Senior Manager

Removed: HR Actions - Accuracy Rate

2016 KPI Timeline for CGCS Member Districts

Milestone Date	
February 22 – April 27, 2016	Surveys open for primary survey period
Mon, February 22	<p>Surveys open on ActPoint KPI website at https://kpi.actpoint.com. PDF copy of surveys sent out for reference. Notifications sent to Chiefs, Superintendents, and all users. Please remember to designate department(s) to handle the Demographics survey.</p>
Mon, February 22	Districts can immediately begin resolving issues with their surveys.
Wed, March 2	First reminder of open surveys
Wed, March 9	Second reminder of open surveys
Wed, March 9, 2016	<p>First participation reports sent out to C-level officers (see how you are doing compared to other CGCS districts!). Superintendents notified if no participation yet by district.</p>
Wed, March 23	Third reminder of open surveys
Wed, March 23, 2015	Second participation reports sent out to C-level officers and superintendents
Friday, March 25, 2015	New benchmark results available online (contingent on participation level). Benchmark against all participating districts for the current survey data.
Wed, April 27, 2015	Final participation reports sent out – thank you!
(thereafter)	Survey submissions still accepted, but may not be included in the CGCS report. Contact CGCS to find out about the further deadlines.

ENTERPRISE RISK MANAGEMENT WHITE PAPER



1301 Pennsylvania Avenue, NW, Suite 702
Washington, DC 20004

Enterprise Risk Management in the Great City Schools

Introduction and Purpose

Public schools have a mandate to educate children in a way that is safe, effective, and cost efficient. The risks involved in achieving that mandate have become increasingly complex, and the need to manage those risks have never been greater.

The emergence of widespread, interconnected risks, such as cyber risks and data management, infrastructure risks, privacy, the threat of terrorism, and workplace violence makes it clear that the nation's public schools need a new approach to managing risk. Many of the most pressing risks and the uncertainties associated with achieving a school district's key mission go beyond insurable risks or activities under the direct control of a school district; they now include a broader range of uncertainties. A broader approach to risk management is needed.

The challenge for members of the Council of the Great City Schools is to identify best practices in managing risk, referred to in this paper as Enterprise Risk Management or ERM. The purpose of this white paper is to present key concepts of ERM and enhance the understanding of how to apply ERM to a K-12 public school setting.

Operational Risk Management and the Evolution of ERM

The profession of risk management has been evolving since the late 1970s, when individuals responsible for purchasing insurance began to seek alternative ways to finance risks. The liability insurance crisis of the mid-80s, when the cost of insurance soared and availability diminished, furthered the development of self-insurance and other risk financing alternatives. In the decades that followed, the concepts of managing operational risks through training and prevention, claims and litigation management, and increasingly sophisticated risk financing structures flourished.

In the United States, operational risk management grew out of issues that related to safety practices and regulations, insurable risks, and the management of claims and loss prevention. Traditional concepts of operational risk management can include any or all of the following components:

- Insurance coverage, such as workers' compensation, property and liability (general, automobile, professional, school board legal, law enforcement)
- Safety, loss prevention. or risk control
- Claims management
- Student and athletic accident programs
- Employee benefits
- Supplemental retirement programs

Operational risk management views risk as *bad* and something to be minimized or mitigated. Treatment methods include reducing potential negative outcomes (through a variety of techniques, such as risk control, training, early intervention, and claims management), transferring the consequences (usually to a third party or an insurance company), or avoiding risk altogether (by not engaging in an activity, for example).

These are effective treatment methods for managing threats that are predictable and within the direct control of schools. However, over the past 40 years, the world of risk has changed dramatically. Natural catastrophes, terrorist events, and financial and global crises have increased the need for risk management solutions that go beyond risk financing and prevention. In addition, organizations that consider how to take risks as part of their overarching strategy, that is, choosing to take calculated *risks* in some cases, are organizations that have led the way to a broader approach to risk management or ERM.

The following illustration outlines the evolution of risk management over the past 30 years as it has expanded to become more strategic.

Enterprise Risk Management in the Great City Schools

“Traditional” Risk Management	Advanced Risk Management	Enterprise Risk Management
Transactional in nature	Focused on integrating risk functions	Focused on strategy & prioritization
<ul style="list-style-type: none"> Purchase of insurance to cover risks 	<ul style="list-style-type: none"> Greater use of alternative risk financing techniques 	<ul style="list-style-type: none"> A wide range of analytical tools are used to identify and respond to key risks to mission and strategy
<ul style="list-style-type: none"> Hazard-based risk identification and controls 	<ul style="list-style-type: none"> More proactive about preventing and reducing claims 	<ul style="list-style-type: none"> A wide range of risks are considered – strategic, financial, operational, and reputational
<ul style="list-style-type: none"> Compliance issues addressed separately Safety & emergency management are separate functions 	<ul style="list-style-type: none"> Integrates risk-related functions such as claims management, contracts review, special events risk management, loss control/prevention 	<ul style="list-style-type: none"> Uses a broader definition of risk to include opportunities and focus on uncertainties to mission
<ul style="list-style-type: none"> Focus is on cheapest cost of insurance premiums 	<ul style="list-style-type: none"> Cost allocation used to share costs and hold departments accountable 	<ul style="list-style-type: none"> Helps manage growth, allocate capital and resources
<ul style="list-style-type: none"> Risk management is handled by individual departments 	<ul style="list-style-type: none"> More collaboration among departments 	<ul style="list-style-type: none"> Risks are prioritized by a broad group and owned by those with direct control
<ul style="list-style-type: none"> The risk manager is the insurance buyer 	<ul style="list-style-type: none"> The risk manager may be the risk owner for the district 	<ul style="list-style-type: none"> The risk manager is the risk facilitator and leader
<p>Risk is <i>bad</i> – focus is on transferring risks</p>	<p>Risk is an <i>expense</i> – focus is on reducing the cost of risk</p>	<p>Risk is <i>uncertainty</i> – focus is on optimizing the management of risk to achieve goals</p>

ERM as Described by ISO 31000 – and What It Means for District Operations

The risk management landscape changed significantly in the years between 2004 and 2009. In 2004, Australia and New Zealand revised their standards for how to manage risk, and the Committee of Sponsoring Organizations (COSO) issued its ERM framework. Both occurrences were game changers in the practice of risk management. COSO, which represents audit and financial organizations, issued directives to internal auditors to assist in the identification, assessment, and treatment of *all* risk (strategic, operations, reporting, and compliance).

At the same time, the Australian and New Zealand standards became the basis for the first international benchmarks in the practice of risk management, a practice that was created by risk experts from over 30 countries around the world. In addition, ISO 31000, “Risk Management Principles and Guidelines,” was published in 2009 after four years of work by the International Standards Organization (ISO).

Informed by these important publications and by the desire of many organizations to create a broader and more inclusive attitude towards risk, the practice of risk management expanded beyond insurable risks and finance mechanisms into how to consider risks as a part of organizational strategy and mission. This new practice emphasized that everyone has a role to play in managing risk, and that a consistent and comprehensive approach—and indeed the *purpose* of managing risk—is to help districts focus on and achieve their mission and strategic objectives.

ISO 31000 was published to guide organizations of any size or type to implement a broader approach to risk management. The document amounts to a guidance standard rather than a compliance standard, because it recognizes that each organization needs to scale and tailor its framework for and process of risk management to its particular operations and mission.

The ISO standard defines risk management as a coordinated effort to direct and control all activities related to risk. It defines risk as the effect of uncertainty on objectives. It therefore ties the management of risk to what is most important to the organization.

ERM recognizes that there are times when accepting (or embracing) and working with risk (in service of a goal or objective) is appropriate. For example, school district leaders may decide upon three unique strategic goals to reduce the achievement gaps among students. There are risks associated with those goals that may increase the likelihood of success as well as risks that may negatively affect the outcome. ERM would help leaders consider and balance the uncertainties that surround possible outcomes and prioritize them in a way that would best support positive outcomes and minimize threats. As risks are identified, prioritized, and evaluated, leaders can determine how risks will be managed – and by whom. The entire process is meant to sharpen one’s aim and focus and enhance the achievement of strategic goals.

ERM envisions that eventually all decisions made by an organization will utilize a consistent and inclusive process that will consider objectives, uncertainties, and possible outcomes *before* a decision is made. This risk-based decision-making process begins with a discussion of *context*, which helps participants understand the importance of the decision in relation to school district mission, strategy, and goals. Leaders will also consider the operational context (which includes the legal and regulatory environment, the financial and cultural climate, and so on), and the process for doing so will engage

appropriate internal and external stakeholders. The process considers both positive and negative outcomes (or threats and opportunities related to a decision) and evaluates the organization's ability to manage identified risks. The entire process is characterized by continuous communications, along with monitoring and revisions to maintain risks within an organization's level of tolerance. The process also identifies risk owners, establishes reporting lines, and considers budget implications.

Key Differences and Challenges

In larger school districts, like the Great City Schools, traditional risk management is usually led by a trained risk professional and a small staff. Claims management, loss prevention, underwriting, and benefits may be provided by in-house staff or outsourced to external service providers. Sometimes, specific risk-related operations—such as employee benefits or workers' compensation—may be handled by a separate department.

In other cases, risk management becomes an additional duty assigned to existing personnel (such as emergency management, procurement, audit, former administrators or human resource personnel). This practice can raise difficulties if those duties are secondary to other responsibilities or if technical and leadership skills are lacking. This situation can also create too much costly reliance on outside experts, such as insurance brokers and consultants.

The organizational location of the risk management function varies widely among school districts. A full-time risk manager may report to the school district's chief financial officer, the director of human resources, or the legal department or may be a member of the superintendent's cabinet or senior staff. To some extent, the importance that the organization gives to risk management is often reflected in the placement of the risk management position and its reporting protocols.

Regardless of position or roles, risk managers who remain focused on operational risks typically develop excellent technical skills in risk financing, claims management, prevention, and risk control. However, the skills needed to advance ERM are more likely to focus more on communications and facilitation, strategic thinking, and leadership. A "traditional" risk manager may find that the lack of these skills limits participation in strategy setting or decision making at a broader more strategic level. As ERM engages in supporting strategy and opportunity, it becomes more closely linked to district management, decision making, and policy-setting across the entire district. This level of activity requires a far different skill set and organizational positioning to be effective.

A fully developed ERM program is often led by a chief risk officer (CRO), a position equal to other chief officers or senior staff. The CRO typically reports to top management, the

school board's audit committee, or sometimes, directly to the board itself. Although the authors of this paper are unaware of any public school district that currently employs a CRO, this is a growing practice among institutions of higher education and large public entity operations. There are a number of K-12 school districts (members of the Council of the Great City Schools) that are currently implementing ERM and whose risk managers are included on the superintendent's senior staff.

Two other significant differences between operational risk management and ERM are worth noting. One relates to the emphasis on risk ownership, which recognizes that the person who has direct control over a specific risk is the one best positioned to manage it. After key risks are identified by a broad group of stakeholders and prioritized in relation to a district's goals and strategy, a risk owner is identified for each one. This is a shift away from one person (or department) holding risk management expertise to a practice akin to making everyone a risk manager. Training all employees on how to assess and handle risk and holding risk owners accountable for managing risk to within tolerable limits are hallmarks of an effective ERM program.

Finally, in an ERM program, risk is *always* prioritized and considered in relation to organizational objectives. Risks to strategy and mission elevate the consideration and prioritization of risk. These considerations also assure that a district will be allocating resources appropriately, that is, to where they are most needed and will be most effective. This differs from a more traditional approach where risk is identified and evaluated according to its potential negative effects, *insurability*, or the ability of the organization to transfer or finance the risk.

Making the Business Case – One School District's Example

Although ERM is often described as ideally having a top-down approach with buy-in and directives from the superintendent and senior management, public schools are not always managed by a distinctly top-down approach. As a result, opportunities to grow ERM organically within an organization are possible. For example, in some districts, school sites are given wide autonomy in their budgeting, hiring, and instructional programming. Enterprise-wide risk can therefore be introduced around specific projects or strategic initiatives.

One example comes from the San Francisco Unified School District (SFUSD). In San Francisco, all schools partner with community-based organizations (CBOs) to provide much-needed ancillary support such as tutoring, childcare, mentoring, reading programs, and so on. SFUSD works with hundreds of organizations that provide services to students and families, organizations that might present liabilities and risks to the school district. Because these services typically are free, they fall outside the normal contracting process that has been established by the district. In an effort to create better structures and

supports for these groups that would result in maximum success for both the district and the various CBOs, an ERM lens was applied.

At the outset, the goal of the district's work was to align the needs of its schools with the available resources provided by the CBOs. First, an existing strategic tool was used (ERM works best when one doesn't reinvent the wheel but uses what an organization already has in place). The Results Oriented Cycle of Inquiry (ROCI) was a model for continuous improvement that was already being used by SFUSD. This tool was used by a cross-functional staff team and became the basis for articulating the process and workflow dealing with CBOs. Out of that process came staffing and software for developing and tracking MOUs. This formed the basis for identifying and outlining contractually the expectations of each party, as well as the process for background clearances, appropriate drug screening, TB testing, insurance, etc.

In addition to articulating operational components of the work with CBOs, what arose from the process was an *opportunity* identified by school site leaders to look at each CBO working in their schools and make key decisions about whether that work aligned with their priorities in their Balanced Score Cards (BSC). The BSC was the second strategic tool used by the schools to outline their vision and goals. In some cases, it was determined that, while the work of a CBO was worthwhile, it did not align with a particular site's most urgent needs and goals, and the relationship was consequently discontinued or redirected to better align with those goals. This process allowed each principal to assess the "risks" of having more CBOs than he or she could manage or to engage CBOs with a mission that was more aligned with the school's mission. This process helped principals focus on key services they needed from CBOs that would better support the achievement of goals set by their school community.

From a risk management perspective, what began as a focus on compliance (MOUs, insurance, etc.), expanded into an ERM model that provided support for strategic objectives and services to better serve the needs of students. It resulted in a process that was broader than simply managing risks through insurance or other similar risk tools.

Other examples of programs that could benefit from the broader lens of ERM include special education, student health programs, and business services such as accounting or human resources.

What's the Return on Investment?

One opportunity to promote the concept of ERM in large urban school districts involves making a business case for the idea and establishing what senior management can expect in terms of return on investment (ROI). The processes of determining ROI

expectations and clarifying key performance indicators need to be specific to a district's needs.

Some examples of ROI for ERM include:

- A defined risk management framework and a specific approach to managing *all risks* specifically described for bond-rating agencies.
- Reciprocal benefits and coordination between internal audit and risk management activities and sub-functions.
- Better education for board members and management on key risks to help them fulfill their oversight and governance roles.
- Collaborative work on risk-related problems (such as the CBO process used by SFUSD).
- Regular internal and external environmental scans for existing and emerging risks.
- Intentional engagement of managers at multiple layers to identify risk concerns and establish connections with other aspects of business operations and strategy.
- Avoidance of penalties and fines for lack of compliance as key risks are identified and managed
- Development of an overall register of key risks for the district and tracking of treatment and plans.
- Treatment plans for prioritized risks provide a credible defense in the face of litigation.
- Gaining the confidence and trust of key stakeholders through communications about the risk management program – demonstrated through engagements, reports, and activities and verified through surveys and feedback.

A broader conversation and identification of risk—including emerging risks and trends—will increase preparedness and ability to respond. The risk assessment process is more pro-active than a post-crisis reaction mode and considers best case/worst case scenarios and responses.

Potential Action Items for Implementing ERM

ERM takes time to implement; it is often described as a three- to five-year endeavor. Although few (if any) districts would claim to have fully implemented ERM, many districts have begun to apply ERM incrementally. The following action steps, in conjunction with the Best Practices outlined in the Appendix, are intended to help districts create an ERM implementation plan.

Action Item #1 – Create a Business Case

Make a business case for implementing ERM. Along with clear messages about the benefits and potential ROI, this step can persuade key decision makers to support a broader approach to managing risk. The business case should be built to support what matters most and tied to strategy, goals, and objectives.

Action Item #2 – Express Your Commitment to Risk Management

The superintendent is responsible for stating the importance of managing risk and support for the district's risk management framework and process. The message should clearly communicate that the district takes risk management seriously and that everyone is responsible for managing risk. Developing the risk management framework and process requires that senior management and the superintendent understand the evolution and importance of taking a broader approach to managing risk than has typically been the case.

Action Item #3 – Think About Structure

ERM, as defined in ISO 31000, must be scaled and tailored. This step means that each district must consider the structure, staffing, and approach that would be the best fit for managing risks to its operations. Districts sometimes begin by creating an overall inventory of how risk is currently managed – in order to develop a plan for risk management to become more consistent, broader, and more integrated. Other options that can help a district develop a more tailored approach include creating a study group or advisory committee, launching a pilot project or case study, or hiring an ERM advisory or consultant.

Action Item #4 – Describe *How You Will Manage Risk*

Districts may define their risk management framework and process in a policy statement, administrative order, or simply through practice and protocol. The description of how and why one manages risk should delineate a sustainable framework, the process for assessing risks, and the methods for continual improvement. Issues such as roles, accountability, and performance measurement should be addressed. This may include clarifying the roles of managers, risk owners, and employees in identifying and managing risk, as well as establishing key performance indicators, key risk indicators, and risk criteria. The ISO 31000 standard provides excellent detail on how to establish and create a sustainable framework and implementation plan. Many districts are currently working on this approach, and it is the intention of the authors of this paper to publish additional white papers to provide implementation guidance.

Action Item #5 – Communicate

The purpose and importance of ERM should be communicated to the entire district and community. Senior management should construct a communication process that ensures that key stakeholders are informed of progress and risk management results. Communication should be transparent and provide a foundation for ongoing monitoring and improvement.

Examples of how risk management monitors and documents results:

- Regular reports to governance bodies (school board or committees)
- Communications to internal and external stakeholders
- Annual reports
- Reports to regulators, financial agencies, or oversight bodies
- Reports to risk financing organizations

Action Item #6 – Apply Risk Management to Decision Making and Procedures

Seek opportunities to apply the risk-based decision-making process to individual projects, problems, or opportunities. For example, an ERM process could help a district understand its best response to coping with an impending deficit in their food service program while continuing to provide desirable, hot, and nutritious meals and remaining compliant with regulations. The process won't necessarily eliminate risk or guarantee an outcome, but it can help the district be better informed as it makes difficult decisions.

Another example might apply to the problem of late bus runs. Imagine engaging multiple stakeholders in considering the implications of late bus runs on student attendance, instructional time, and operational efficiencies. A thorough review of sources, triggers, likelihood, consequences, and potential outcomes associated with late bus runs could engage stakeholders in identifying, assessing, evaluating, and treating the associated risks.

Another opportunity to broaden one's approach to risk management is to incorporate it into existing policies and procedures. Some examples might include project management, the budget process, performance management, management reports to financial rating agencies, and change-management procedures.

Action Item #7 – Establish Accountability and Performance Measures

School districts should create performance measures, key risk indicators, and expected outcomes for how risk will be managed and clearly establish who is accountable for those outcomes. Departments such as transportation, food services, facilities, and safety and

security utilize explicit performance metrics and are logical places to begin. The risk management group associated with the Council of the Great City Schools has begun to identify common denominators for measuring risk-management performance and build upon the preliminary list of ROI incorporated in this paper.

Action Item #8 – Look Ahead

Where does your district need additional coordination or communication about identifying and dealing with risk? School districts should establish greater collaboration between risk management activities and internal audit or similar functions within a district. Internal audit, for instance, serves an important function in ensuring that risk management is addressing a broad array of risks and contributing to successful outcomes. This may also include the review of key performance indicators and business management processes.

ERM integrates consideration of risk into decision making at all levels of the organization. For a mature program, the risk management process should be integrated into key organizational processes such as strategic planning, performance and process management, internal control, compliance, and governance.

Conclusion and Call to Action

We live in a world of uncertainty where the need for risk management has never been greater. Implementing ERM can help districts navigate that uncertainty. It provides a framework for strategic thinking, consistent management, continual improvement, and communication. It also specifies a process for assessing risk that supports strategy, goals and objectives. ERM is a practical model that helps prioritize all risks and brings focus to decisions and activities. Over time, implementing ERM will build resilience and preparedness for all stakeholders.

It is important to recognize that ERM is an emerging practice among businesses, public entities, the federal government, and school districts in the United States. The ERM approach to managing risk is far-reaching and growing in support. For public school districts, implementing ERM can be a low-cost, high-yield strategy that improves the chances that we'll be able to achieve our most important goal—the education of the next generation.

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Council of the Great City Schools

Council of the Great City Schools

White Paper on ERM

Appendix A

Best Practices

Best Practices for a large urban school district to define and measure ERM performance:

- ✓ The Risk Management function is at a senior staff level and reports directly to a cabinet level position within the school district.
- ✓ The school district creates an annual strategic plan, which includes wording to capture the upside and downside of risk (or opportunities and threats) as it pertains to the strategic plan.
- ✓ Newly created school district initiatives are evaluated from an ERM perspective, using a consistent risk analysis process to identify, prioritize, and manage potential threats and opportunities, assign risk owners, and track treatment. The ERM perspective considers the values and perceptions of key stakeholders and plans for communication, monitoring, and the review of key risks.
- ✓ Risk Management goals are set and evaluated annually to assure support of the school district's mission and vision statements.
- ✓ Risk Management discussions are included in cabinet meetings to assure that key internal stakeholders (for example, transportation, food services, facilities, special education, safety and security) are identifying and controlling risks within their respective operations.
- ✓ The school district's audit function coordinates with the district's ERM program to audit prioritized risks and shares responsibility with the Risk Management function to assure successful outcomes.
- ✓ Risk Management monitors and documents the results of the school district's ERM program by reporting out to regulators, financial agencies, and other outside organizations and stakeholders.
- ✓ The school district has established specific return-on-investment (ROI) criteria for the creation and sustainability of its ERM program in order to benchmark and report on results.

URBAN SCHOOL EXECUTIVES PROGRAM



Urban School Executives Program
1301 Pennsylvania Avenue, N.W., Suite 702
Washington, DC 20004

The Council of the Great City School is accepting nominees for its **Urban School Executives (C'USE) Program**. The program which was launched in 2011 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 Financial Officers and take on the challenges that large urban school districts face. There are executive programs out there, but none that focus exclusively on the unique needs of these school districts.

The **C'USE Program** is based on the lessons learned from reviews that the Council has conducted in its member districts that illustrate the political, strategic, organizational, leadership, management and operational issues and challenges that Chief Financial Officers face.

C'USE requirements include the following--

- ❖ Candidates attend the Council's annual meeting of Chief Financial 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 90-day, one year and longer-term strategic business plans that address the systemic issues and challenges with 15 minute overviews of those plans at the annual meeting of the Chief Financial Officers in the following year.

C'USE Certificates of Achievement presented to those judged by subject-matter experts selected by the Council and references provided for those qualified to assume senior executive positions to take on the challenges that large urban school districts face when they become available.

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ANCHORAGE HUMAN RESOURCES REPORT



Review of the Human Resources Operations of the Anchorage School District

Fall 2015

Ed Graff, Superintendent of the Anchorage School District (ASD), requested that the Council of the Great City Schools (CGCS) provide a high-level management review of the school district's Human Resources operations.¹ Specifically, he requested that the organization—

- Review and evaluate the leadership and management, organization, and operations of the school district's Human Resources Department
- Develop recommendations that would help the Human Resources department achieve greater operational efficiency and effectiveness, and enhance its strategic value to the district.

In response to this request, the Council assembled a Strategic Support Team of senior managers with extensive experience in human resources from other major urban school systems across the country. The team was composed of the following individuals. (Attachment A provides brief biographical sketches for each 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

Justo Avila
Chief of Human Resources
Los Angeles Unified School District

Amanda Bailey
Associate Vice President of Human Resources
Morehouse College

¹ The Council has conducted nearly 300 instructional, management, and operational reviews in over 50 big-city 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.)

Review of the Human Resources Operations of the Anchorage School District

Ann Chan
Assistant Superintendent, Academics Operations (Former)
Boston Public Schools

Karen Rudys
Assistant Superintendent, Human Resources
Albuquerque Public Schools

The team conducted its fieldwork for the project during a four-day site visit to Anchorage on October 13-16, 2015. The general schedule for the site visit is described below. (The Working Agenda for the site visit is presented in Attachment B.)

The team met with the superintendent, the board president, and board member liaison to the Council on the evening of the first day of the site visit to discuss the expectations and objectives for the review and to make final adjustments to the work schedule. The team used the second and third days to conduct interviews with staff members (a list of individuals interviewed is included in Attachment C), to review documents, reports, and data provided by the district (a list of documents reviewed by the team is presented in Attachment D), and to observe the district's Human Resources operations.

The final day of the visit was devoted to synthesizing and refining the team's findings and recommendations, and briefing the superintendent on those draft findings and proposals.

The Council sent a draft of this document to team members for their review in order to ensure the accuracy of the report and 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 efficiency and effectiveness of the district's Human Resources functions and to enhance their strategic value to the school system.

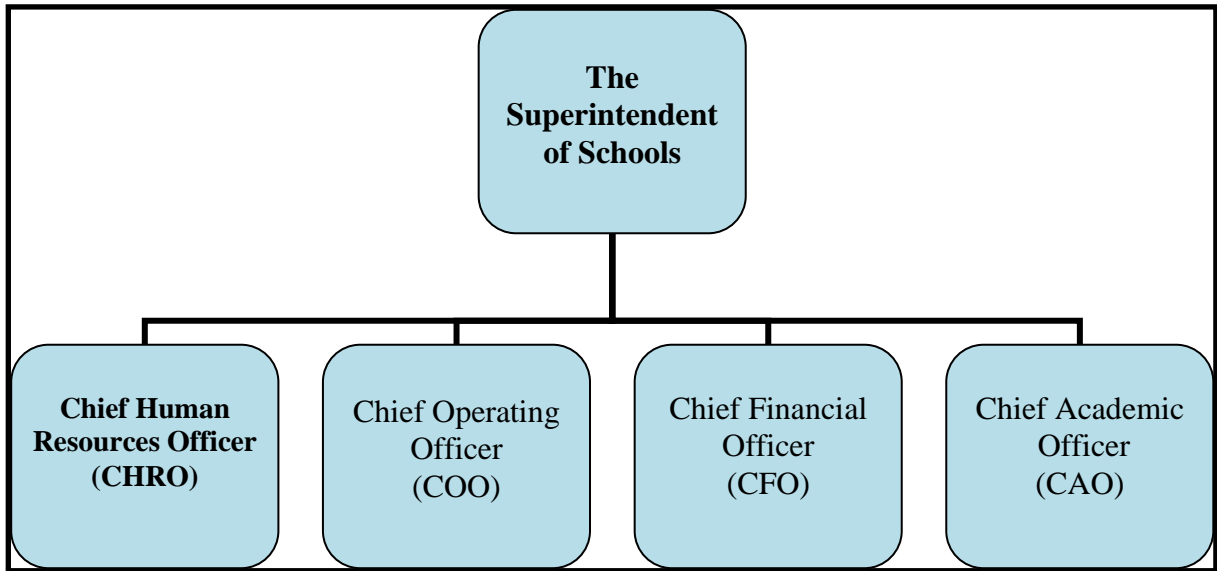
The Anchorage School District Human Resources Department

The Anchorage School District (ASD) is the largest public school system in Alaska and the 93rd largest school district in the United States. The district operates more than 100 schools with approximately 48,000 students and nearly 5,000 staff members.

ASD is a dependent school system, as it is a component unit of the municipality of Anchorage. The district is governed by a seven member Board of Education, which is elected at-large from the community. The ASD superintendent acts under the direction of the board and is responsible for running day-to-day district activities.

Exhibit 1 below shows the overall district organization and the direct reports to the superintendent, which include the Chief Human Resources Officer (CHRO), Chief Operations Officer (COO), the Chief Financial Officer (CFO), and the Chief Academic Officer (CAO).

Exhibit 1. ASD Organization Chart 2015-2016

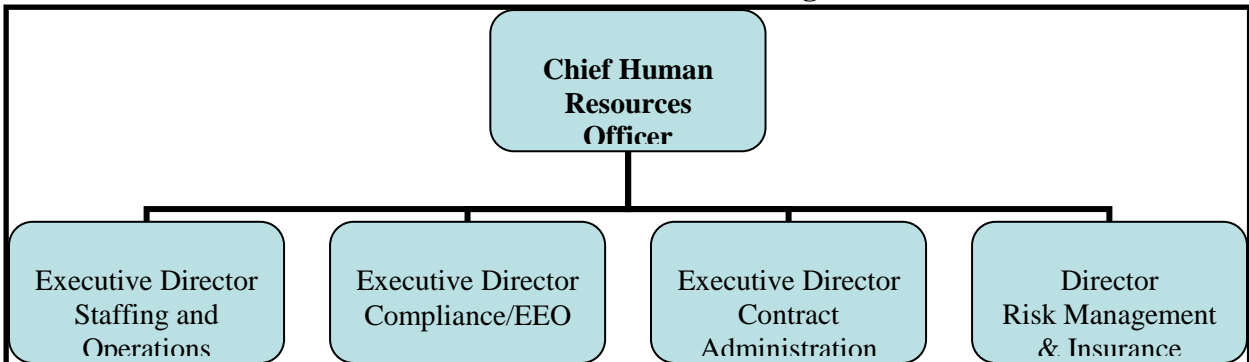


Source: Prepared by CGCS based on information provided by ASD

Exhibit 2 below displays the organization of the Human Resources (HR) Department. The Chief HR Officer has four direct reports, in addition to his administrative staff, and a total staff of 35. The direct reports include –

- The Executive Director of Staffing and Operations, with a staff of 20 including an Assistant Director, six specialists, and 13 administrative assistants.
- The Executive Director of Compliance/EEO, with a staff of three specialists and one administrative assistant.
- The Executive Director of Contract Administration, with a staff of two specialists and one administrative assistant.
- The Director of Risk Management and Insurance, with a staff of two claims adjusters and one medical claims technician.

Exhibit 2. Human Resources Organization Chart



Source: Prepared by CGCS based on information provided by ASD

Exhibit 3 below displays the Human Resources budget for the 2015-2016 fiscal year, according to the organizational units shown above.

Exhibit 3. Human Resources Budget – 2015-2016

Organizational Unit	Budget Amount
Human Resources Administration	\$ 296,999
Staffing and Operations	2,186,439
Compliance/EEO	471,460
Contract Administration	184,511
Risk Management & Ins.	929,113
Total Human Resources	\$ 4,068,522

Source: Prepared by CGCS based on information provided by the ASD

Findings and Observations

The Council’s Strategic Support Team findings and observations are organized into four general areas: Commendations, Leadership and Management, Organization, and Operations.

Commendations

- The recent turnover of a number of upper management positions across the district has created an opportunity for the administration to explore new approaches to continuing issues.
- The staff of the HR Department was found by the Council team to be hard working, dedicated, and responsive. For example –
 - The team was impressed with the professionalism of the staff of the Compliance/EEO Unit.
 - Work-load balances have improved in the Staffing and Operations Unit due to the restructuring and cross training of personnel, thereby reducing overtime at the start of school-year and eliminating work over the Labor Day weekend.
 - Front-line staff appears to operate with a sense of urgency.
- The HR Department has developed a number of innovations to improve instructional operations. For example –
 - The General Education to Special Education (GETS) program assists General Education teachers in transitioning to Special Education teachers through tuition assistance and other supports.
 - A substitute teacher pay-rate increase has increased the number of qualified staff in an expanded sub-pool.

Review of the Human Resources Operations of the Anchorage School District

- Support-services staff and instructional managers expressed a high level of confidence and support for the HR Department.²
- The Records Management Unit appeared to be efficient, orderly, and is in the process of digitizing the district’s archival files.
- The Payroll Unit, which reports through the Chief Financial Officer, appears to operate efficiently based on the low Payroll Unit overtime levels and the small number of payments that must be recalculated each pay period.
- HR Department processes and procedures are documented in operating manuals.
- The HR Department’s office space employs an “open concept” to facilitate staff communications.
- FAQs for certificated and classified staff positions are posted on the HR website.

Leadership and Management

- District staff members do not appear to reflect the diversity of the Anchorage community or the student body.
- The HR Department does not have a business plan with goals, objectives, benchmarks, milestones, and accountabilities that are aligned with the district’s overall strategic vision.
- The HR Department is not a data-driven organization. For example –
 - Data are not used to actuate decisions.
 - Basic statistical and management information is not readily available or regularly analyzed, such as data on–
 - Turnover rates by job classification
 - Absentee rates by location and job classification
 - Substitute usage and cost by job type and location
 - Vacancy rates by job classification and location
 - Number and location of out-of-field certified staff
 - The department maintains recruitment data that relates to field, source and educational level, but gender and ethnicity data, which should be used by HR to diversify district staff is maintained by EEO as a compliance function.

² The team was not able to determine why the same level of satisfaction was not reflected in the comments of school principals.

Review of the Human Resources Operations of the Anchorage School District

- Analytical tools and techniques (such as cost/benefit analysis, risk assessment, and business-case justifications) are not used.
- HR collects salary and benefits information, but the team did not see evidence that the department uses this information to establish compensation packages that would be competitive with external markets.
- Key Performance Indicators (KPIs) are not used to measure, benchmark, and compare the performance and effectiveness of the Department or its sub-units.
- The HR Department does not have standard-reporting mechanisms by which the superintendent or school board could evaluate its performance and direction. For example—
 - An annual HR performance report is not generated.
 - The HR Accountability Report, which typically contains substantial raw data on department operations, was not prepared for the 2014-15 school year.
- There are no service-level standards within the district; employee productivity is not measured; and there is no attempt to distinguish or identify efforts that add value to district operations.
- The team was presented with a draft Recruitment Plan for the current school year, but, the HR recruitment staff was not involved in its development and was unaware of its existence or content.
- The district has not adopted or deployed a succession plan for mission-critical positions, as previously recommended in a Council review of ASD.³
- The district has a professional development plan developed by its Professional Learning Department and programs for its certificated staff, but there is no comparable plan or programs available for classified support staff.
- The HR Department's communications with district staff members are inadequate. For example –
 - There is no HR communications plan to inform employees of HR services or district personnel policies.
 - The team heard no evidence of regularly scheduled labor-management meetings to resolve or mitigate issues before they become grievances.

³ *Review of the Organizational Structure and Staffing Levels of the Anchorage School District, 6/25/2012*

Review of the Human Resources Operations of the Anchorage School District

- The team heard no evidence that HR and the teachers' bargaining unit have collaborated on developing a program to support teachers who need and could benefit from improvement plans.
- The Department does not use customer surveys with new or continuing employees, or use exit interviews to evaluate employee satisfaction with HR services.
- The team heard that embedded organizational silos within HR impede communications and dampen the ability of staff to resolve known issues and challenges.
- The team was told that the CHRO does not regularly meet with school principals to address HR issues or processes that directly affect school-based leaders.
- School principals interviewed by the team indicated that communications from the HR Department can be confusing and that receiving responses to questions can be difficult.
- The personnel evaluation process does not always incorporate agreed upon performance expectations and does not contain linkages to professional growth strategies. For example, the management evaluation process does not tie individual performance to the district's strategic plan, goals, or activities.

Organization

- The HR Department has recently hired management personnel who did not have previous HR experience and there is no structured program in place to develop their HR expertise. This has resulted in a lack of strategic vision of what the HR Department might aspire to be and a lack of the specific skill sets needed to execute technical work on a daily basis.
- The Risk Management Unit, which is part of the HR Department, is not positioned in the organization to provide a strategic enterprise-level view of the district's risk exposures and tolerances.

Operations

- While general personnel policies are contained in the Anchorage Board of Education Policies (Sections 500 and 600), HR management identified a number of these policies that needed to be updated.
- The district has no position-control system to help ensure that only those positions that are budgeted are filled, as noted in a previous Council review of ASD.⁴
- The district's workforce planning process does not afford principals the opportunity to successfully dispute enrollment projections impacting their schools' staffing levels, which can result in the unnecessary displacement of teachers.

⁴ *Review of the Student Nutrition Department of the Anchorage School District, December 2011*

Review of the Human Resources Operations of the Anchorage School District

- The team heard a number of concerns relating to HR’s teacher recruitment efforts. For example--
 - HR does not use stakeholder groups to help determine the attributes, qualities, and characteristics by which to rank teacher candidates for interviews.
 - HR has not developed techniques to effectively deal with delays in the annual state and local budget processes that create challenges for the timely recruitment of the most desirable candidates, an issue previously identified in a Council review of ASD.⁵
 - School principals believe their exclusion from recruitment activities and the initial vetting of teacher candidates has negatively impacted the quality of the hiring pool.
 - Following school-level interviews, only HR personnel are authorized to communicate hiring decisions to candidates, which some principals feel compromises their authority and delays timely communication with qualified candidates that might prevent their accepting employment elsewhere.
 - HR has not established pipeline programs with local university partners to develop pre-service teachers in hard to staff areas.
 - Hiring decisions are not shared or discussed with stakeholder groups.
- The district has a limited orientation for on-boarding new teachers. (Principals claimed that new teachers are given a bundle of information and sent on their way and Principals are left responsible for filling gaps.)
- School principals interviewed by the team expressed dissatisfaction with the quality and skill levels of candidates in the classified employment pools.
- Both HR and some support departments claim to perform the recruitment, interviewing, and selection functions for classified staff, which may result in inefficient and redundant processes—or gaps.
- The HR Department has not fully utilized available technology to improve operational efficiency and effectiveness. For example--
 - Certificated personnel actions (“502 forms”) are computerized while actions involving classified positions are not.
 - The applicant tracking system does not automatically feed the HRIS system, which is creating bottlenecks in the on-boarding process for new hires.
 - The district does not have on-line employee self-service for routine changes in staff information; e.g., name, address, phone, e-mail, dependents, etc.

⁵ *Review of the Organizational Structure and Staffing Levels of the Anchorage School District, 6/25/2012*

- The HR Department uses a menu system to guide phone inquiries to the right areas, but the team did not see evidence that the system is capable of or used for monitoring or tracking call resolutions.

Recommendations

The Council offers the following recommendations and proposals to improve the HR Department's leadership and management, organization and operations, and its strategic value to the district:

1. Develop additional strategies and recruitment efforts to diversify the district's workforce to better reflect the makeup of the community.
2. Develop a strategic Business Plan for the Department, with the participation of staff and other stakeholders, which is specifically linked to the district's Strategic Plan, and contains measureable goals, objectives, timelines, and lines of accountability.
3. Create a data-driven organization that relies upon fact-based and analysis-centric justifications for decisions, including the use of tools and techniques such as--
 - a. Basic HR statistics, metrics, and management information, e.g., disaggregated turnover rates, absentee rates, substitute usage, vacancy rates, and recruitment data
 - b. Cost/benefit analysis, risk assessment, and business case justification
 - c. Root cause analysis to address operational problems
 - d. Salary surveys to measure competitiveness and equity
 - e. Key Performance Indicators (KPIs) and benchmarks to measure and compare performance and effectiveness.
4. Create regular, and standardized reporting mechanisms to keep the superintendent and school board informed as to the Department's direction, activities, progress, successes as well as shortcomings.
5. Establish departmental service-level standards and employee productivity measures.
6. Working with stakeholders, create a workforce planning/recruitment/selection/placement master plan that includes--
 - a. A personnel cycle calendar that provides an annual workforce forecasting process, the early identification of needs and allocations, and timely authorization for the issuance of new employment contracts

Review of the Human Resources Operations of the Anchorage School District

- b. Clearly defined procedures and processes for the recruitment, selection, and placement of all staff
 - c. A plan to build relationships and maintain pipeline programs with local university partners to increase the numbers of pre-service teachers in hard to staff areas
 - d. Processes for reporting hiring results to stakeholder groups.
7. Conduct succession planning for mission-critical positions.
8. Design and implement a districtwide professional development plan that engages all employees (certificated and classified) and includes--
- a. A comprehensive orientation and job specific on-boarding process for new hires
 - b. On-going professional development to enhance job skills and promotional opportunities for continuing employees
 - c. A process for analyzing and correlating employee evaluation data with school performance results to provide direction for professional development programs.
9. Set up a centralized tracking system to monitor participation in training provided to all staff.
10. Develop and execute an HR communication plan that provides for –
- a. Dissemination of federal and state laws, school board policies and administrative procedures relating to staffing formulas, recruitment, salary schedule placement, leave programs, required training, promotional opportunities, and employee benefits in a clear and user-friendly manner
 - b. Regular meetings with school principals to address their concerns
 - c. Labor-management meetings to resolve or mitigate issues before they become grievances
 - d. Collaboration with the teachers’ bargaining unit to develop a program to support teachers who may be in need of an improvement plan
 - e. Surveys of employee satisfaction and exit interviews
 - f. Regular department-wide staff meetings to facilitate internal communications.
11. Re-vamp employee evaluation instruments and processes to incorporate expectations, performance measures, and professional growth strategies and train supervisors on the effective use of evaluation procedures.

Review of the Human Resources Operations of the Anchorage School District

12. Ensure that HR functions have qualified people, with the applicable skill sets, in the appropriate positions.
13. Re-position the Risk Management unit so that it provides a strategic enterprise-level view of the district's risk exposures and tolerances.
14. Update personnel-related school board policies as appropriate.
15. Establish a districtwide automated position-control system.
16. Develop a comprehensive strategy for improving the quality and skills of candidates in the classified employment pools.
17. Review and evaluate district systems for recruiting, interviewing, and selecting classified staff, and eliminating inefficient and redundant processes.
18. More fully utilize available technology to improve operational efficiency and effectiveness. For example-
 - a. Computerize personnel actions ("502 forms") for classified positions.
 - b. Create an automated interface between the applicant-tracking system and the HRIS system.
 - c. Implement an on-line employee self-service application for routine changes and updates to staff information; e.g., name, address, phone, e-mail, dependents, etc.
 - d. Acquire and implement an automated call-management system for the HR Department that tracks call resolutions.

DUVAL COUNTY FINANCE REVIEW



Review of the Financial Operations of the Duval County Public Schools

December 2015

Nikolai Vitti, the Superintendent of the Duval County Public Schools (DCPS), requested that the Council of the Great City Schools (CGCS) provide a high-level management review of the school district's financial operations.¹ Specifically, he requested that the Council² —

- Review and evaluate the leadership and management, organization, and operations of the district's financial functions, with a particular focus on payroll, procurement, and P-card operations.
- Develop recommendations that would help the financial functions achieve greater operational efficiency and effectiveness.

In response to this request, the Council assembled a Strategic Support Team of senior managers with extensive experience in financial, payroll, and procurement operations from other major urban school systems across the country. The team was composed of the following individuals. (Attachment A provides brief biographical sketches of each team member.)

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

Maryanne Cox
Controller
Baltimore City Public Schools

¹ The Council has conducted nearly 300 instructional, management, and operational reviews in over 50 big-city 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.)

² The Council conducted a Management Assessment Review for DCPS in 2002, a Review of Financial Operations in 2006, and a Review of Facilities Operations in 2015.

Review of the Financial Operations of the Duval County Public Schools

Julie Davidson
Payroll Manager
Seattle Public Schools

Odalis J. Garces,
District Director - Payroll
Miami-Dade County Public Schools

Joseph Gomez
Assistant Superintendent Procurement Management Services (Retired)
Miami-Dade Public Schools

John McDonough
Interim Superintendent and Chief Financial Officer (Retired)
Boston Public Schools

Sheila Shirley
Chief Financial Officer
Charlotte-Mecklenburg Schools

The Council team conducted its fieldwork for the project during a four-day site visit to Jacksonville, Florida on December 1-4, 2015. The general schedule for the site visit is described below. (The working agenda for the site visit is presented in Attachment B.)

The team met on the first day of the site visit to discuss expectations and objectives for the review, and to make final adjustments to the work schedule. The team used the second and third days of its fieldwork to conduct interviews with staff members and others (a list of individuals interviewed is included in Attachment C), and to review documents, reports, and data provided by the district (a list of documents reviewed by the team is presented in Attachment D).³ The final day of the visit was devoted to synthesizing and refining the team's findings and to debriefing the Chief Financial Officer, the Assistant Superintendent of Operations, and the Assistant Superintendent of Strategic Planning on the team's preliminary conclusions.

The Council sent a draft of this document to team members for their review in order to ensure the accuracy of the report and 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 efficiency and effectiveness of the district's financial functions.

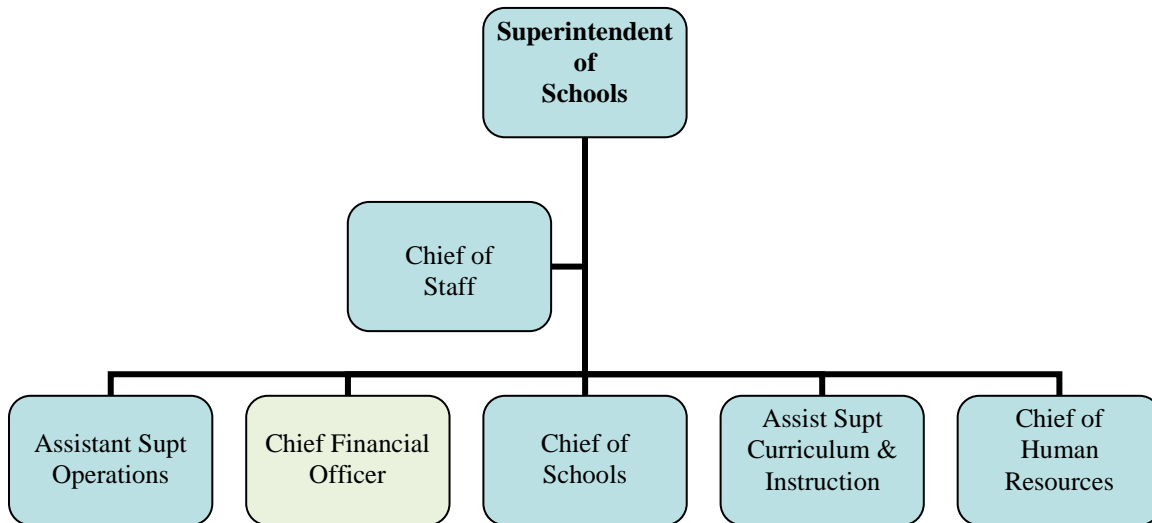
³ The Council's peer reviews are based on interviews of district staff and others, a review of documents provided by the district, a review of key performance indicator data, observations of operations, and the team's professional judgment. In conducting interviews, the teams must rely on the willingness of those interviewed to be factual and forthcoming, but cannot always judge the accuracy of their statements.

The Duval County Public Schools Financial Operations

The Duval County Public School District (DCPS) is the sixth largest public school system in Florida and the 22nd largest system in the United States. The district operates 160 schools with approximately 115,000 students and 13,000 full and part time staff members. The school district's 2015-16 budget for all funds totals some \$1.7 billion.

Exhibit 1 below shows the district's overall organizational structure and the primary direct reports to the superintendent, which include the Chief of Staff, the Assistant Superintendent for Operations, the Chief Financial Officer (CFO), the Chief of Schools, the Assistant Superintendent of Curriculum & Instruction, and the Chief of Human Resources.

Exhibit 1. DCPS Organization Chart (August 2014)

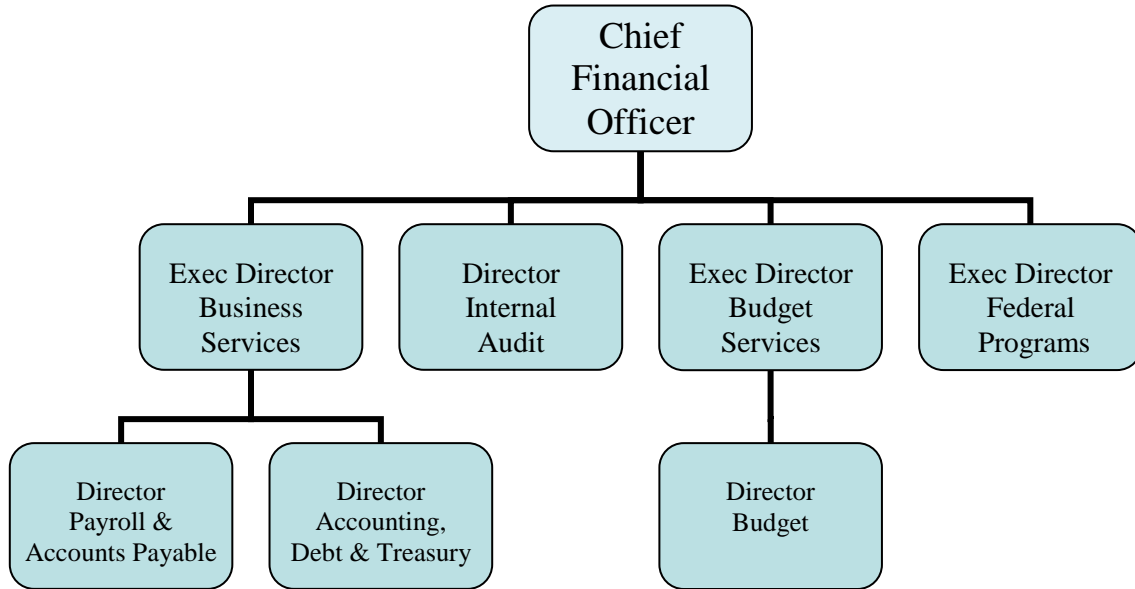


Source: Prepared by CGCS based on information provided by DCPS.

Other direct reports to the superintendent (not shown in Exhibit 1) include the Chief of Legal Services, the Assistant Superintendent of Strategic Planning and Partnerships, the Assistant Superintendent of Communications, the Chief of Police, and the Assistant Superintendent of Accountability and Assessment.

The Financial Division is headed by the Chief Financial Officer (CFO). The CFO's direct reports include the Executive Director of Business Services, the Director of Internal Audit, the Executive Director of Budget Services, and the Executive Director of Federal programs, as displayed in Exhibit 2 below.

Exhibit 2. Financial Division Organization Chart



Source: Prepared by CGCS based on information provided by DCPS

The Business Services Department of the Financial Division is headed by an Executive Director, and includes the district’s payroll, accounts payable, accounting, debt and treasury functions. Its stated mission is “to provide high quality fiscal services in a customer-oriented environment to schools, departments, and the public while providing accountability and compliance with federal, state and other regulatory agencies to facilitate a successful educational experience for students.” The Department has approximately 57 employees, including five in management and support, 21 in payroll, 14 in accounts payable, 11 in various accounting functions, four in treasury, and two in debt service.

The Internal Auditing Department, headed by a Director, provides an independent appraisal of school activities by reviewing operations and evaluating effectiveness of internal control procedures. Its stated purpose is to “provide assurance that the internal control process within each school is adequately designed and functioning effectively while evaluating the manner in which district school organizations comply with Board and Administrative policies and procedures, as well as state and federal guidelines.” The department has 15 positions.

The Budget Services Department “is committed to continually enhancing school performance through delivery of high quality district management, operational support and customer service.” The department, headed by an Executive Director and a Director, has a total of nine positions.

The mission of the Federal Programs Department is “to obtain and manage external funds from federal sources for the support of existing programs, development of new instructional techniques, evaluation of program effectiveness, and for other purposes that will improve student achievement in Duval County Public Schools.” The department is headed by an Executive Director and has a total of 18 positions.

Findings and Observations

The overall conclusion of the Council’s Strategic Support Team is that the “*Duval County Public School system is generally in sound financial condition, but there are operational concerns that need attention.*” Specifically, the team’s findings and observations are organized into four general areas: Commendations, Leadership and Management, Organization, and Operations. Please note that the footnotes contained herein are an integral part of this report.

Commendations

- The staff of the Financial Division appeared to be hard working and dedicated to their assigned tasks.
- The district has achieved both the American School Business Official’s (ASBO) and the Government Finance Officers Association’s (GFOA) certifications for its Comprehensive Annual Financial Report.
- The Business Services Department’s Monthly Financial Report and Analysis are considered to be of “Best Practice” quality in interim financial reporting.
- The district has established a model Investment Policy.
- The Business Services Department has created an extensive task list to assist in year-end closing.
- The district has achieved direct payroll deposit for over 96 percent of its employees.
- The Payroll and Accounts Payable units have prepared reports identifying their strengths, weaknesses, opportunities, and threats (S.W.O.T. reports), which also contain selected performance metrics.
- Vendors interviewed by the team expressed general satisfaction with the district’s bidding/RFP procedures and invoice-payment processes.
- The Internal Audit Department has conducted a district-level risk assessment to identify areas of significant exposure.
- The Internal Audit Director has developed and presented to the school board an Audit Plan identifying areas of focus for the current fiscal year and developed plans to expand the scope of internal auditing in future years.

- The school district, in cooperation with other local governmental agencies, has conducted a disparity study, which serves as the basis for its proactive Office of Equal Opportunity programs.⁴

Leadership and Management

- There appeared to be a weak “sense of urgency” in dealing with issues and challenges in the finance offices. For example --
 - There is an apparent lack of awareness of unfunded initiatives in the district, while the district has a critical deferred maintenance backlog of at least \$2 billion.
 - There seems to be an inability to enforce deadlines with other departments and schools, e.g., payroll-approval deadlines, receipt of goods documentation that enables the payment of vendors, and accounting information for the closing of financial books in a timely manner.⁵
 - Finance administrators were unaware of the potential financial implications of the Affordable Care Act, including the “Cadillac Tax” provisions.⁶
- Neither the Financial Division nor its individual departments have business plans with specific goals, objectives, timelines, resource allocations, accountabilities, and reporting that are linked to the district’s strategic plan.⁷
- There is no executive sponsor in the Financial Division for the district’s ERP system, a situation that contributes to the system’s under-utilization.
- The Budget Department’s functions are too narrowly defined, and it operates on a transactional rather than strategic level. For example --
 - The budget office does not participate in high-level resource-allocation discussions and budget priority deliberations.

⁴ Disparity studies are conducted to determine whether a district has a compelling interest in continuing a Minority and Women Business Enterprise (M/WBE) program. The study compares the actual number of minority and woman-owned business enterprises (M/WBE) that exist against the actual number of M/WBEs being utilized in district contracts. A disparity exists when there is underutilization of available M/ WBEs.

⁵ Internal control weaknesses relating to the recording of liabilities and the timely approval of payroll timesheets have been previously reported to DCPS in its auditor’s Management Letter Comments; however, these conditions continue to exist in the district.

⁶ The Patient Protection and Affordable Care Act (PPACA, as amended by the Health Care and Education Reconciliation Act of 2010), imposes an annual 40 percent excise tax on plans with annual premiums exceeding stated dollar limits starting in 2018, to be paid by insurers. (Federal legislation passed subsequent to the team’s field work may postpone the impact of this tax.)

⁷ The CFO advised the team that specific objectives and targets are included in the evaluations of each manager at the departmental level. The team, however, believes that this practice alone does not provide adequate transparency for aspirations and results.

Review of the Financial Operations of the Duval County Public Schools

- There appeared to be a lack of appreciation for the needed connection between the district's strategic plan and the annual budget at an operational level.
- The budget office does not provide its review and comments on interim financial reports before they are issued.
- The district's budget development process is merely a roll-over and add-on system, and does not systematically weigh alternatives, evaluate current programs, or vet competing priorities.
- The district takes a conservative approach to budgeting for its end-of-year balances. For example --
 - By policy, the district budgets a General Fund ending balance of five percent when only a three percent balance is required by state law.
 - The district's operating budget does not provide for the effects of short- and long-term personnel vacancies.⁸
- The annual budget lacks a degree of transparency because the budget department has discontinued the production of a detailed Budget Book and currently produces only a 20 to 30-page budget summary.
- The team noted several troubling weaknesses in the district's position control system. For example --
 - Management of the position control system resides in the Human Resources Department rather than in the Budget Department, which raises internal control issues.
 - The system allows multiple personnel to be assigned to a single position.
 - The system allows for the assignment of personnel to unfunded positions.
- Some employees seemed to lack the skills and training for their assigned positions. For example --
 - Based on team interviews, it appeared that only one of the buying staff members had obtained professional certifications for the position held.⁹
 - Accounts payable personnel did not appear to have a comprehensive grasp of their systems and procedures.

⁸ This issue was previously identified in the 2006 Review of the Financial Operations of the district conducted by the Council of the Great City Schools.

⁹ Professional-purchasing associations, such as the American Purchasing Society, offer certification programs for buyers to become Certified Purchasing Professionals (CPP) and Certified Professional Purchasing Managers (CPPM).

- The Financial Division has no overall training plan or programs for its staff.
- Organizational silos within the Financial Division limit communication and coordination among the various departments.

Organization

- The Board of Education does not have a Budget and Finance Committee to provide a focus on fiscal issues.
- The school board also does not have a designated Audit Committee with external members that have audit and financial expertise.¹⁰
- The Internal Audit Department reports to the CFO rather than directly to the Superintendent or a School Board Audit Committee.¹¹
- The district's Investment Committee does not have any external members that have investment expertise.¹²
- There is no IT governance structure or steering committee to establish priorities.¹³
- The programmatic and instructional monitoring functions of the Federal Programs Department might be more appropriately placed in the Curriculum and Instruction Division.
- The Budget Department appears to have excessive layers of supervision as shown in its organization chart, which indicates a single direct-reporting relationship from an Executive Director to a director and the director to a supervisor.
- Most areas of the financial organization appeared to be well staffed, however, the team observed that this may be due to an excessive number of manual procedures and processes used in its operations. For example --
 - The most recent KPI report¹⁴ of the Council of the Great City Schools indicated a ratio of payments-processed per payroll-FTE in the district was 632 to 1, compared to the median of 1,451 to 1 for all reporting districts (this could reflect extensive manual payroll processes in the district and/or be a sign of overstaffing).

¹⁰ This issue was previously identified in the 2006 Review of the Financial Operations of district conducted by the Council of the Great City Schools.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Managing for Results in America's Great City Schools: A Report of the Performance Measurement and Benchmarking Project, Results from Fiscal Year 2013-14, Council of the Great City Schools, October, 2015.

Review of the Financial Operations of the Duval County Public Schools

- The KPI for the Accounts Payable unit involving payments processed per month per FTE showed that the district was at 1,240, while the median of Council districts was 1,546¹⁵ (a possible indicator of lower productivity and/or overstaffing).
- There has been no review of the work-load impact of the use of P-cards on staffing levels of the Accounts Payable or Procurement Departments.
- It was reported to the team that school-based bookkeepers are stretched too thin without adequate staff resources, training, workspace, or backup.

Operations

- The team was informed by Financial Division staff that IT support for their business systems was inadequate, which was attributed to unfilled IT positions.
- The team noted several areas of particular concern in Accounts Payable Department operations. For example --
 - The system's automated Accounts Payable three-way-match process¹⁶ has not been fully implemented.
 - The team heard that some payments are directed by upper management without appropriate documentation, and it was unclear if subsequent supporting documentation is provided.
 - Not all accounts payable processes are adequately documented.
 - The Accounts Payable Department does not track purchase discounts taken and discounts lost.
 - Classroom-supply reimbursements to teachers are paid out of local school activity accounts rather than a central Payroll Department function, which increases the work-load at the school level and may provide weaker disbursement review, audit trail, and control.
- Procurement operations were lacking in several areas. For example --
 - There are no purchase-order approval thresholds or hierarchies that would provide greater scrutiny to higher-value procurements.¹⁷
 - There is no formal vendor-evaluation process and the district lacks an on-line system to track vendor performance.

¹⁵ Ibid.

¹⁶ Accounts Payable three-way-match processes rely on comparing purchases orders, invoices, and receiving documents prior to payment.

¹⁷ The purchase order approval process does not flow through the Business Services Executive Director, Chief Financial Officer, or Superintendent based upon increasing dollar thresholds--such review and approval occur at the time of vendor payment after the goods have been received or the work has been completed.

Review of the Financial Operations of the Duval County Public Schools

- There is no central, automated system to manage product warranties.
- No analysis is conducted to determine if purchasing decisions made centrally are more cost effective than those made at the local school level.
- P-card expenditures are not analyzed to determine if economies of scale are fully realized by utilizing pre-qualified vendors.
- The distribution of P-card expenditure statements has not been automated.
- Purchase orders are not analyzed to determine if use of the P-card process would have been more appropriate or cost effective.
- The following operational concerns were noted in the Payroll Department -
 - There was no automated time and attendance system resulting in excessive manual processes, such as paper payroll rosters, payroll bags, and leave slips.¹⁸
 - Inefficiencies in the payroll process result from the eight different payroll groups that the district has created, which require eight different payroll runs, eight separate positive pay files be sent to the bank, eight different wire transfers be made each pay period, and eight separate communications be made to school principals each pay period.
 - It was unclear if the district's disaster recovery plan could actually ensure that all employees would continue to be paid in the event of a significant disaster.
- The team was told that the scope of Internal Audit examinations is not expanded when fraud or mismanagement is detected.

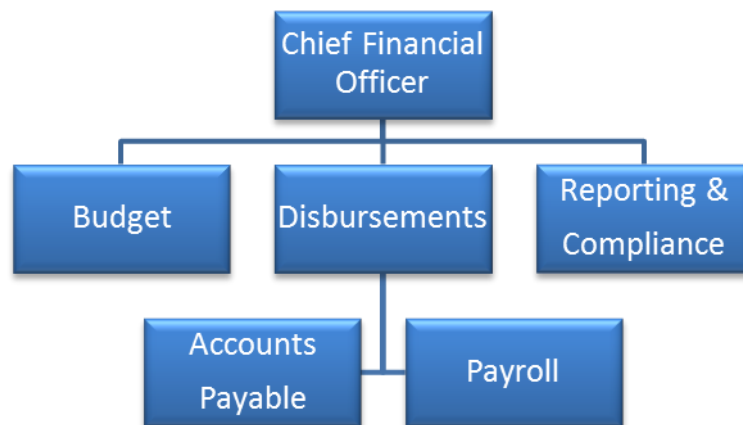
Recommendations

1. Establish a school board-level Budget and Finance Committee to provide a high level focus on the district's fiscal issues and empower it with the following responsibilities—
 - a. Review and approve a transparent annual budget development process that includes group priority-setting by the executive staff and the open discussion of augmentations and reductions options at the board level
 - b. Review and approve interim and longer-term financing mechanisms and debt service allocations
 - c. Review all interim and annual financial reports.

¹⁸ This issue was previously identified in the 2006 Review of the Financial Operations of the district by the Council of the Great City Schools.

2. Establish a School Board Audit Committee composed of board members and community leaders with experience in accounting, finance, or auditing and empower it with the following responsibilities—
 - a. Review and approve the Internal Auditor’s annual work plan based on a district-level risk assessment
 - b. Review and comment on all internal and external audit reports
 - c. Review and comment on all interim and annual financial reports.
3. Establish a direct reporting relationship between the Internal Auditor and the school board’s Audit Committee.
4. Establish an Investment Committee, with external members that have investment expertise, to recommend investment policies and monitor investment activities.
5. Establish an administrative IT governance structure to adopt technology priorities and guide systems development, and designate the CFO as the executive sponsor of the district’s ERP system.
6. Move the programmatic and instructional monitoring functions of the Federal Programs Department to the Curriculum and Instruction Division.
7. Re-organize the remaining Financial Division by function to include the Budget Department, the Disbursements Department (including Accounts Payable and Payroll), and the Reporting and Compliance Department (including the accounting functions, debt service, and treasury). Exhibit 3 below shows a proposed organization chart by function.

Exhibit 3. Proposed Functional Organization Chart



Source: Prepared by CGCS.

8. Chart the workflow and examine staffing levels in each unit of the new Finance Division to eliminate excessive layering and ensure they are right-sized.
9. Redefine the scope and responsibilities of the Budget Department to include a districtwide strategic vision of resources planning and allocation.
10. Consider re-establishing the annual Budget Book to provide greater detail and transparency to the district's annual budget.
11. Move the administration of the position control system to the Budget Department and correct system flaws that allow the assignment of multiple people to a single position and the staffing of unfunded positions.
12. Develop a business plan for the Financial Division and its departments with specific goals, objectives, timelines, resource allocations, accountabilities, and reporting calendar that are linked to the district's strategic plan.
13. Design and implement a division-wide staff training and development program, and encourage the pursuit of professional certifications by employees.
14. Examine the adequacy of resources provided for school-based bookkeepers and their training, workspaces, and backup provisions.
15. Breakdown internal silos and improve communications within the Financial Division by conducting regularly scheduled departmental meetings and cross-training staff members of various units.
16. Fill vacant IT positions that support the Financial Division with competent and committed staff.
17. Implement the ERP system's automated accounts payable three-way-match process.
18. Establish, document, and comply with standard operating procedures in accounts payable, and provide a mechanism for reporting process departures or violations.
19. Create a business process analysis capability in the Procurement Department to develop purchasing thresholds, vendor evaluation systems, automated product warranty controls, and analyses of cost effectiveness of various procurement tools and techniques such as P-cards, purchases orders, master contracts, pre-qualification of vendors, and decentralized decision making.
20. Automate the distribution of P-card expenditure statements.
21. Implement an automated time-and-attendance system and eliminate excessive manual processes, such as paper payroll rosters, payroll bags, and leave slips
22. Establish procedures to ensure that all schools/locations adhere to deadlines, including payroll (time and attendance) approvals.

Review of the Financial Operations of the Duval County Public Schools

23. Restructure the procedural aspect of certain off-cycle payments (e.g., teacher's supply payment) to be a central function, rather than a school-level activity.
24. Simplify payroll processes by reducing the number of payroll groups and computerizing work flows.
25. Establish Internal Audit protocols that automatically expand an audit's scope when fraud or mismanagement is detected.
26. Review and evaluate the adequacy of the district's disaster recovery plan, specifically as it relates to recovery of the payroll system.

**HILLSBOROUGH COUNTY TRANSPORTATION
REPORT**



Review of the Transportation Program of the Hillsborough County Public Schools

December 2015

Jeff Eakins, Superintendent of Schools of the Hillsborough County Public Schools (HCPS), requested that the Council of the Great City Schools (CGCS) provide a high-level review of the school district's transportation program. Specifically, he requested that the Council¹—

- Review and validate the Department of Transportation's (DoT) recent managerial and organizational changes
- Review and comment on the DoT's training and hiring practices
- Examine the DoT's interface with and support from the district's Human Resources Division in recruiting and onboarding new drivers
- Review the district's school bus replacement plan
- Develop recommendations that would help the district's transportation 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 transportation operations and human resources from other major urban 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 Palmer, Principal Investigator
Deputy Director of Transportation (Retired)
Los Angeles Unified School District

¹ The Council has conducted nearly 300 instructional, management, and operational reviews in about 50 big-city school districts over the last 15 years. The reports generated by these reviews are often critical but they have 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.)

Review of the Transportation Department of the Hillsborough County Public Schools

Nathan Graf
General Manager, Transportation Services
Houston Independent School District

Nicole Portee
Executive Director, Transportation Services
Denver Public Schools

Lynn Simpson
Executive Director, Transportation
Fulton County Schools

Patricia Snell
General Manager, Transportation Services
Broward County Public Schools

Susan Thompson
Chief Officer - Human Capital
Metropolitan Nashville Public Schools

The team reviewed documents provided by the district prior to a four-day site visit to Tampa, Florida, on December 6-9, 2015. The general schedule for the site visit is described below and the complete working agenda for the site visit is presented in Attachment B.

The team met with Superintendent Jeff Eakins and Chief Operating Officer Christopher Farkas during the evening of the first day to discuss expectations and objectives for the review, and to make final adjustments to the work schedule. The team used the second and third days of the site visit to conduct interviews with key staff members (a list of individuals interviewed is included in Attachment C), and to examine additional documents and data, (a complete list of documents reviewed is included in Attachment D).²

The final day of the visit was devoted to synthesizing and refining the team's findings and recommendations, and providing the Chief Operating Officer with a briefing on the team's preliminary conclusions.

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 HCPS transportation program.

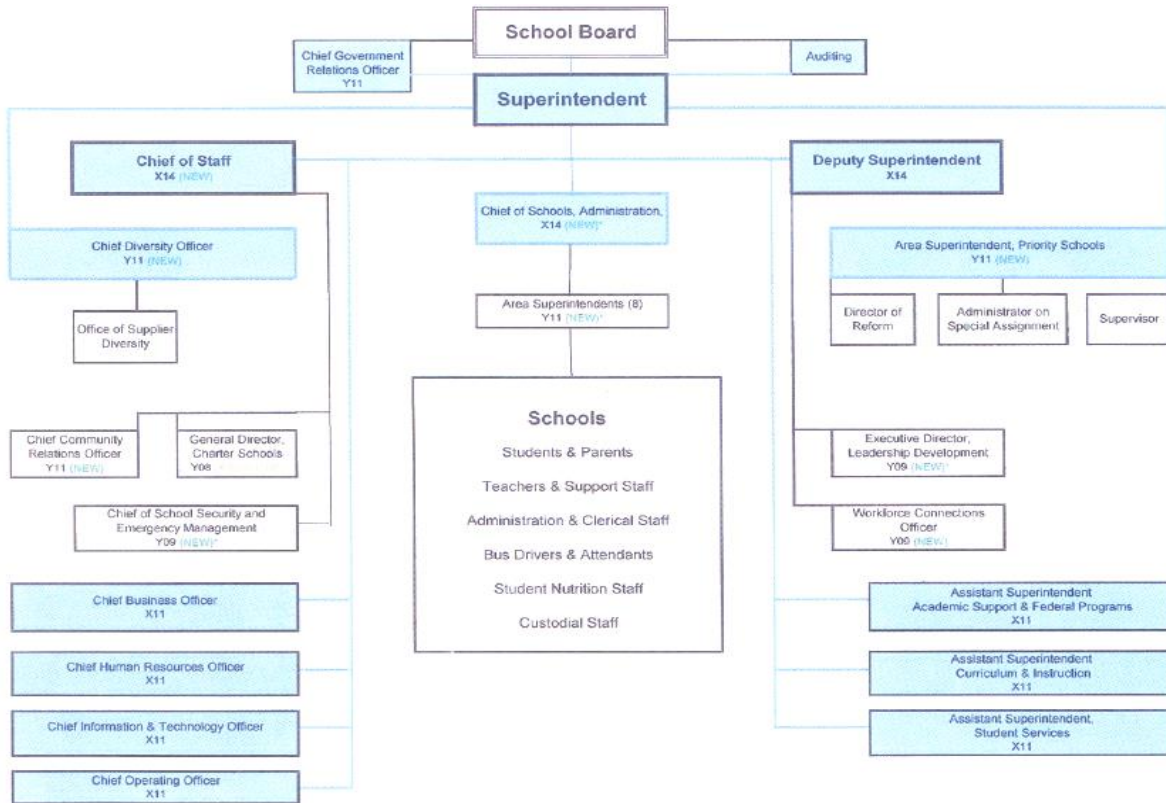
² The Council's reports are based on interviews with district staff and others, a review of documents, observations of operations, and professional judgment. The team conducting the interviews must rely on the willingness of those interviewed to be truthful and forthcoming, but cannot always judge the accuracy of statements made by interviewees.
Council of the Great City Schools

Hillsborough County Public Schools

HCPS is the eighth largest school district in the nation currently and currently has an increasing enrollment of over 212,000 students. Hillsborough County encompasses a large geographic area spanning over 1,000 square miles, which creates unique logistical challenges for the transportation program of the school district.

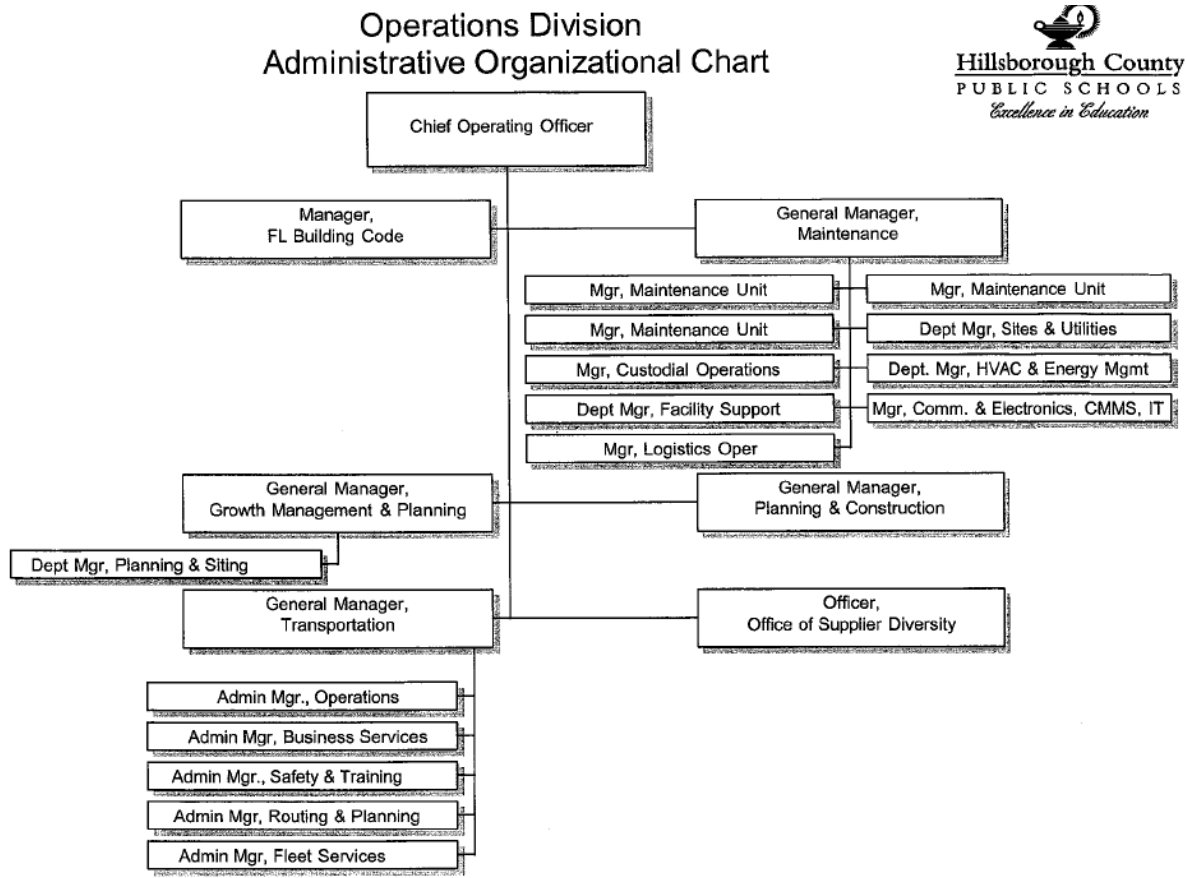
HCPS is governed by an elected seven-member school board that appoints the Superintendent of Schools. The Superintendent is responsible for the effective operation of the school system, including implementation of the district’s strategic plan and the efficient management of the district’s resources. An abridged overview of the superintendent’s administrative organization is displayed below in Exhibit 1.

Exhibit 1. Superintendent’s Administrative Organization Chart



The Chief Operations Officer (COO), who is a direct report to the Superintendent and Chief of Staff, is responsible for the Building Code, Energy Conservation, Growth Management, Maintenance, Planning and Construction, and Transportation. The organizational structure of the Chief Operations Officer’s unit is shown below in Exhibit 2.

Exhibit 2. Chief Operations Officer’s Organization Chart



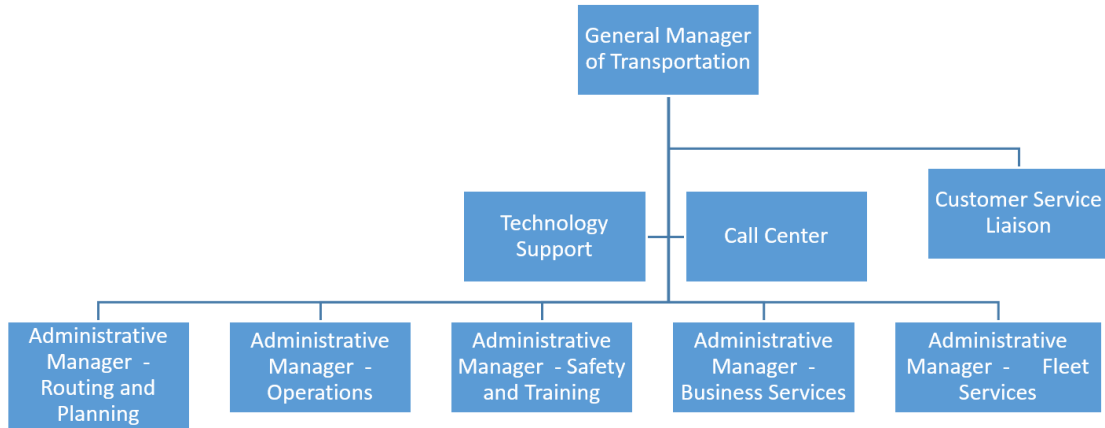
The Transportation Department

The DoT is responsible for the daily transportation of over 90,000 students (45.5 percent of the district’s total enrollment) on 988 district-operated bus routes, which travel over 17 million miles annually. In addition to yellow school buses, the DoT maintains over 600 white-fleet vehicles. As result of a recent school board-approved reorganization,³ the General Manager of the DoT now has eight direct reports: Administrative Manager – Routing and Planning, Administrative Manager – Operations, Administrative Manager – Safety and Training, Administrative Manager – Business Services, Administrative Manager – Fleet Services, and three support functions: Technology, Call Center, and Customer Service.

Exhibit 3 below shows the department’s organizational structure.⁴

³ The DoT reorganization plan was approved by the Board of Education on November, 17, 2015.

Exhibit 3. Transportation Department Organization Chart



Prior to this review, three other studies of the district’s transportation department had been conducted during the past nine years, including--

- Council of the Great City Schools (2006)
- Management Partnership Services, Inc. (MPT) (2007)
- School Bus Consultants (SBC) (multiple contracts) (2014)⁵

Exhibit 4 shows (with an “X”) several critical areas identified in these studies that have not yet been fully addressed by the district.

Exhibit 4. Previous Transportation Department Studies

Partial Listing of Areas Identified Requiring Attention	Findings and Recommendations Contained in the CGCS 2006 Study	Findings and Recommendations Contained in the MPT 2007 Study	Not Completed as Reported in the SBC 2014 Progress Report	Status at the Time of the 2015 CGCS Review
Driver Shortage	X	X	X	Still Severe
Compensation	X	X	X	Some Progress
Fleet Replacement		X	X	In Progress
Courtesy Riders	X	X	X	Currently \$7.9M Non-Reimbursed Liability
Buses not Parked in Compounds	X	X	X	Still Severe
Bell Schedules and Tiering	X	X	X	Not Fully Leveraged
Garage Facilities	X	X	X	Still Severely Lacking

Source: Studies’ described above and Board Reports

⁵ In 2014, SBC was contracted to evaluate the district’s progress in implementing MPT’s *School Improvement Plan*’s recommendations, to conduct a fleet replacement analysis, and conduct a cost-benefit analysis of introducing alternative-fueled buses into the fleet.

Findings

The findings of the Council's Strategic Support Team are organized into five general areas: Commendations, Leadership and Management, Organization, Operations, and Human Resources Division Support for Bus Driver Onboarding and Retention. These findings are followed by a set of recommendations for the district.

Commendations

- The district's administration is acutely aware of the transportation issues identified in this report and has been proactive in attempting to bring attention and resolution to these issues.
- HCPS has selected a General Manager for the DoT who has introduced a number of initiatives that are changing the culture, improving the morale, and moving the department forward. For example --
 - *Driver of the Month* and *Driver of the Year* recognition awards have been instituted
 - DoT staff participated in the area Christmas parade by decorating a school bus in a Christmas theme and walking the parade route
 - Drivers were surveyed to identify problem areas issues, and route-bidding was reintroduced
 - Professional development classes for department employees were instituted that will include life skills training such as résumé writing and household budgeting
 - The Council of the Great City Schools' *Managing for Results* Key Performance Indicators (KPI) have been introduced to benchmark district transportation operations⁶
 - The *Driver's Handbook* is being updated
 - Scorecards are being used to measure performance and accountability
 - On-time arrival of buses is being tracked at all schools.
- The DoT has begun to use metrics to assess performance, drive improvements, and hold employees accountable.

⁶ The Council's Managing for Results system is a Performance Measurement and Benchmarking Project that identifies performance measures, key indicators, and best practices that can guide the improvement of non-instructional operations in urban school districts across the nation.

Review of the Transportation Department of the Hillsborough County Public Schools

- According to the Human Resources Division Manager, Risk Management and Safety unit, there has been a downward trend in district vehicles involved accident claims.⁷ (Estimated costs have gone from \$30,000 to \$15,000 per accident claim) since 2000 due, in part, to –
 - Proactive defensive driving instruction
 - Improved accident investigation
 - Cameras on school buses
 - Field inspectors at accident sites.
- The DoT instituted several practical initiatives to reduce operating costs. For example --
 - A maximum deadhead⁸ travel distance for park-outs⁹ has been implemented for this school year
 - Discussions with public transportation providers are taking place in an effort to provide more transportation options
 - Stronger controls of overtime are now in place
 - Outsourcing certain repair services (air conditioning, engine, and transmission) have allowed mechanics to focus on the timely repair of vehicles.
- Driver trainers have trained over 775 new district bus drivers since 2011.¹⁰
- The DoT is leveraging the use of mass communications opportunities. For example –
 - Blackboard Connect is a commercial product that is now being used to notify parents of bus delays
 - Local television, radio, and social media are used for driver recruitment.
- The Department’s General Manager participates on the district’s Claims Settlement Committee to provide input and expertise.
- New bus drivers receive 70 hours of training, which greatly exceeds the state minimum of 28 hours of training.¹¹

⁷ Per the HCPS Manager, Risk Management and Safety, the DoT accounts for approximately 80 percent of vehicle liability claims against the district.

⁸ The term “deadhead” refers to a bus’s traveling without passengers.

⁹ A “park-out” is a bus not parked overnight in a secured parking facility or compound that is designed for buses.

¹⁰ Source: Spreadsheet provided by HCPS Driver Trainers.

¹¹ Florida requires a minimum of 20 hours of classroom and 8 hours of behind-the-wheel training for new bus drivers.

- The district’s acquisition of the AppliTrack software has helped streamline and track the employment application process.

Leadership and Management

- The COO and General Manager have taken significant steps to address the culture and move the department forward (as noted above), while the staff has taken a decidedly “wait and see” attitude to changes.
- It was apparent to the team that the district has done little to implement many key recommendations contained in prior studies (see Exhibit 4 above), particularly those related to driver shortages. Exhibit 5 below displays a multi-year trend in ongoing bus-driver shortages.

Exhibit 5. HCPS Bus Driver Shortages¹²

School Year	Start of School Year		End of School Year	
	Authorized Positions	Vacancies	Authorized Positions	Vacancies
2012-2013	1108	109 (10%)	1108	127 (11%)
2013-2014	1109	169 (15%)	1229	228 (19%)
2014-2015	1229	270 (22%)	1234	215 (17%)
2015-2016	1234	219 (18%)		

Source: HCPS Driver Allocation Reports

- The team found no evidence of succession planning within the department to handle retirements, promotions, or resignations of key department staff.
- The DoT operates without adequate awareness of, or accountable for, a department budget. As a result, the team was unable to verify that department budgets are aligned to an approved Strategic Plan or to department needs.
- The team was told that a considerable amount of management time is spent responding to complaints sent to school board members.
- Poor intra- and inter-departmental communication is an issue identified by staff at all levels of the DoT.
- The decreasing number of fleet mechanics and supervisors, and inadequate shop facilities, equipment, technology, and training may impact the condition of the fleet over time. To illustrate –

¹² The methodology to determine the correct number of positions needed is currently under review by the DoT.
Council of the Great City Schools

Review of the Transportation Department of the Hillsborough County Public Schools

- Due to vacancies, the current bus-to-mechanic ratio is 46:1¹³
- The time to repair and place buses back into service is extended.
- The team was told that there are no school board-level operations committees or sub-committees with a dedicated focus on non-instructional operational issues, such as transportation.
- While the district has adopted a bus-replacement plan, it remains to be seen if there is a long-term commitment to it.¹⁴
- The team identified a number of management “best practices” that are not being followed. For example–
 - Commitments for DoT services occur without DoT knowledge or collaboration, resulting in unnecessary costs
 - Employees are encouraged to bypass the organizational chain of command and discuss concerns and grievances with high-level district administrators and school board members
 - Board of Education policy permits school board members to have direct communications with employees, bypassing the office of the superintendent.
- The newly assigned Administrative Manager for Routing and Planning faces immediate challenges, including –
 - There has not been an adopted routing timeline involving key departments (SPED, Choice, Magnets, IT, etc.) for at least the last four years
 - Significant shortcomings in the routing software system that could impact a smooth school opening
 - School boundary changes that are not finalized until June, which is well after the fall routing process has begun
 - The length of time that it takes to add a regular education stop after school starts
 - Possible understaffing.¹⁵

¹³ Based on the 2013-2014 CGCS *KPI Report*, the median ratio for Florida’s reporting districts is 21:1.

¹⁴ In FY2014-15, HCPS failed to procure 100 new school buses as planned. However, at the next (FY2015-16) 100 bus-purchase cycle, the Board of Education on September 29, 2015, approved the purchase of 200 buses.

¹⁵ Based on the 2013-2014 CGCS *KPI Report*, HCPS exceeds the Florida and national medians for Routes per Planner.

- It was reported to the team that the DoT was a “dumping ground” for poor performing district employees.
- The team saw no evidence that customer satisfaction surveys were used to measure performance or improve service.
- The team heard that a new phone system had been installed at the DoT’s call center, but that existing stations do not have voice mail.
- The team was told that there was –
 - Weak monitoring of charter buses and their drivers
 - A lack of ongoing safety meetings with fleet staff
 - Little monitoring or reviewing of hazardous walk-zone criteria, resulting potentially in a loss of state reimbursements
 - A lack of accountability for job performance.
- Conflicting information from DoT and Safety was presented regarding the timeliness of incident/accident/crash reviews.

Organization

- DoT organizational charts reviewed by the team focused on operational functions, but not organizational depth. As a result –
 - Roles, responsibilities,, and reporting relationships are not clearly defined
 - The number of positions allocated to each function was not available for review.
- It was reported to the team that there is a significant lack of field supervisors to monitor daily school bus field operations.¹⁶
- The team was told that the DoT uses only two (2) Commercial Driver License (CDL) testers, which is low, compared to the number of drivers that need to be tested.¹⁷

¹⁶ Based on the 2013-2014 CGCS *KPI Report*, HCPS drivers per supervisor is 113.11, which far exceeds the national median of 43.32.

¹⁷ After the team’s site visit, the DoT added three (3) additional CDL testers.

Operations

- The district's ERP system contains data on all district employees, but it was not clear to the team that the Human Resources Division staff knew how to use and/or had interest in using these data to help DoT measure performance or drive improvements.
- The DoT implementation of an upgrade to its routing software has been hindered by a lack of support from IT.
- Drivers reported to the team that it takes an inordinate amount of time to dispatch school police to locations when students are unruly.
- The team was told that there is a lack of school-based support for drivers experiencing student discipline incidents on buses, which is contributing to low driver morale and high driver attrition.
- There are in excess of 13,000 courtesy-transported students, which --
 - Exposes the district to unnecessary liability when providing non-mandated services
 - Incurs a significant cost¹⁸ in that buses and available seats are dedicated to this non-required and non-reimbursed service.
- There is inadequate and unsecured bus parking, which has resulted in –
 - Buses parked overnight throughout the district without sufficient control or security
 - Drivers parking their take-home buses on their personal property
 - Additional district liability and worker compensation exposure
 - Service delays when park-out buses are not operable
 - Additional costs for driver time and mileage when buses are shuttled to garage facilities for repairs and preventive maintenance
 - Drivers reporting that some of the newer buses cannot be secured and are being vandalized

¹⁸ Based on the 2013-2014 CGCS *KPI Report*, the HCPS average cost per transported student is \$606.00/yr. This amount multiplied by the reported 13,000 courtesy rider population results in an unfunded/non-reimbursed cost of \$7.9M.

- Some school-site principals not allowing drivers, who park their buses at school sites overnight, to park on campus during the middle of the day (during the driver’s mid-day split shift).

Human Resources Support for Bus Driver Onboarding and Retention

- HCPS has difficulty recruiting and retaining bus drivers, because its often part-time employment and salary levels may not be competitive.
- There have been a number of studies over the past nine years that have offered reasonable and appropriate recommendations to manage the driver shortage issue, but the team found little evidence of a concerted or sustained effort to implement these recommendations.
- There are different units involved in the recruitment, onboarding, and retention of DoT employees. As a result –
 - There is no one department that has ownership of the complete recruitment, onboarding, or retention process
 - There is no clear plan for attracting and retaining drivers
 - It is unclear who in HR is “dedicated” to resolving the DoT driver shortage. To illustrate–
 - The team was informed that there were at least two groups in HR charged with this responsibility
 - The team was told that HR has a “lower” commitment to the recruitment of classified staff than certificated staff.
- It was unclear to the team whether HR provides much value-add to resolving the driver shortage since HR staff could not describe what value the division brings to the process.
- HR staff members were unclear about the meaning of position control and who owned it.
- There is an aspiration on the part of some HR staff to expand services such as recruiting and onboarding, and to provide exit interviews of classified employees, but it was unclear to the team if the staff had the capacity or knowledge about how to proceed to implement that aspiration.
- The team found very few channels for or expectations of collaboration between HR and DoT.
- HR and DoT claim that the other is responsible for the length of time it takes to fill positions – no one owns the process on either side. Both groups often claim that the applicants are

responsible for causing problems when trying to fulfill the requirement to provide proof of “lifetime” driving history and record.¹⁹

- There appears to be competing departments and functions in HR, which result in little clear or regular workflow, a lack of ownership, a lack of priorities, redundancies, added time to complete tasks, and extended time to complete the hiring process.
- HR does not appear to be conducting any ongoing market-driven salary studies, which are needed to keep the district competitive. For example, the Office of the Chief Operating Officer conducted its own salary study prior to the DoT’s hiring a new Administrative Manager – Fleet Services.
- The district does not conduct exit interviews or track reasons why employees voluntarily separate from service. DoT employees attributed the significantly high driver turnover rate²⁰ to –
 - The low starting bus-driver salary (\$12.21/hr.)²¹
 - Drivers being required to start at step-one regardless of their past experience, which impacts the DoT’s ability to attract seasoned drivers²²
 - The number of years needed to reach the top step on the salary schedule (30 steps)²³
 - Higher paid driving opportunities in other school districts in the region
 - The lack of support from school-site administrators regarding student discipline
 - The slow response time from school police to assist with unruly students.
- HR staff members interviewed by the team were unable to provide a written process (i.e., flow chart) describing the steps necessary to onboard a school bus driver. Exhibits 6 and 7 compare the onboarding process HR diagramed on a white board during our interview process with a flowchart provided by the DoT. The sequence of steps differed as well as did descriptions of areas of responsibility.

¹⁹ The team was told that many applicants have driving histories from other states and countries, and the applicant must secure these histories for review and approval prior to onboarding.

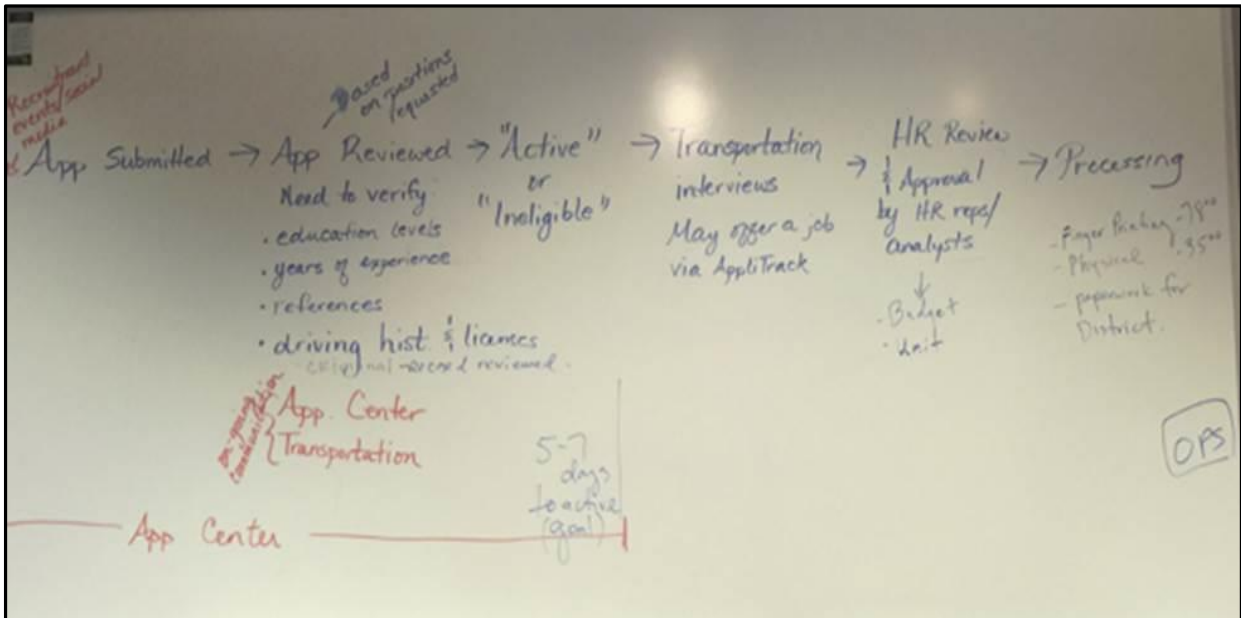
²⁰ Substantiated by the number of new drivers trained since 2008 and the ongoing driver shortage (Exhibit 5).

²¹ The day after the team’s site visit, the Board of Education approved salary increases for the entire bargaining unit. Starting bus driver salary was raised to from \$12.21/hr. to \$12.71/hr.

²² The day after the team’s site visit, the Board of Education approved an MOU with the Hillsborough School Employees Federation that modified this practice allowing up to seven (7) years of experience credit to employees after they pass probation. One year of experience credit equates to a one-step increase on the salary schedule.

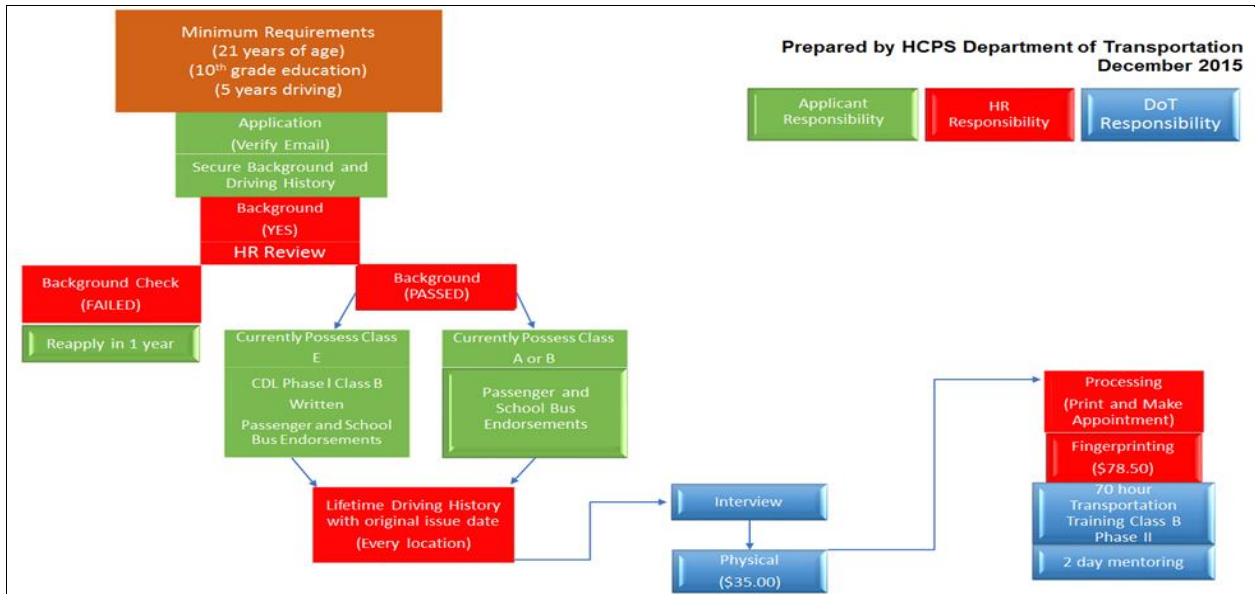
²³ The day after the team’s site visit, the Board of Education approved changes in the salary schedule by eliminating Steps 1 and 2, thus reducing the maximum number of steps from 30 to 28. The highest hourly salary for a bus driver is now \$22.12/hr.

Exhibit 6. Bus Driver Onboarding Process Diagrammed By HR Staff²⁴



Source: HR Division Staff

Exhibit 7. Bus Driver Onboarding Process Diagrammed By DoT Staff



Source: Department of Transportation

²⁴ HR staff was provided an opportunity to submit a more polished document but failed to do so.

Recommendations

1. Create an effective communication system throughout the organization that includes channels up and down the system and regular meetings with stakeholders at each level with specific agendas, documented minutes of discussions, and follow-up activities so employees know—
 - a. The department’s goals and objectives and how they will be achieved
 - b. How they will be held accountable for and be evaluated in the process
 - c. That managers and supervisors are held accountable to ensure that information is decimated down through the organization and feedback is passed-up the organization.
2. Convene ongoing meetings with appropriate department heads to review and prioritize items listed in Exhibit 4 that have not started or are not completed. Use the previous studies’ recommendations and the recommendations in this study as a “road map” to develop business plans, cost/benefit analysis, timelines, and to assign project owners to move the recommendations forward.
3. Develop a comprehensive and definitive departmental business plan with goals and objectives, benchmarks, performance measures, accountabilities, and costs that support the district’s strategic plan and include timelines and process descriptions for, at least, the following activities –
 - a. Annual route planning
 - b. Receipt of student data (SPED and Regular Education/Choice)
 - c. Identification of all new or moved program placements
 - d. Summer routing and program placement decisions
 - e. Budget development
 - f. Bus driver and field supervisor positions needed
 - g. Training and route planning positions needed
 - h. Fleet replacement
 - i. Training and professional development
 - j. Technology and program initiatives
 - k. Defined performance measures, including KPIs and industry standards, for all major functions of the department

Review of the Transportation Department of the Hillsborough County Public Schools

1. Manager accountability
 - m. Employee performance appraisal and evaluation.
4. Charge the General Manager as the person responsible and accountable for the financial management of the district's Transportation Department.
5. Review legal requirements and industry standards for mechanic/vehicle ratios and develop a business plan to bring HCPS fleet services to appropriate staffing and supervision levels.
6. Phase-out transportation for "courtesy" riders, except where there is an overriding safety concern. When this is the case, use a descriptive term such as "hazardous condition" when transportation is provided and ensure that funds are available to supplement state funding to support this transportation.
7. Prioritize funding for bus replacement for at least the next eight (8) years using Capital Millage Dollars, Community Investment Tax Dollars, Sale of Bus Funds, and, if needed, General Fund Non-Recurring Dollars.
8. Establish school board policy to ensure that they are focused at the policy level and not micro-managing day-to-day operations of the transportation department.
9. Implement programs to measure customer satisfaction, including customer surveys, and to help identify issues and priorities. (At a minimum, input from parents, school administrators, customers of fleet services, teachers on field trips, athletic directors, and coaches should be solicited.)
10. Establish an annual interdepartmental routing-timeline committee that would set appropriate and acceptable deadlines for the submission of data and the completion of tasks to ensure the timely and accurate routing of students in the summer and fall. (This committee should include key department heads from IT, Special Education, Student Assignment (Choice/Magnet), transportation, and Boundary/Demographics.)
11. Require IT to prioritize the upgrade to the DoT routing software to ensure that full "stress" testing has taken place well-before the commencement of the fall routing process.
12. Evaluate the current DoT telephone system(s) and upgrade, where necessary, to ensure that all stations can transfer calls, receive voicemail, conduct conference calls, and forward incoming calls after hours.
13. Ensure that monitoring of the following is taking place --
 - a. Charter school transportation compliance
 - b. Annual evaluation of hazardous walk-zone transportation for state reimbursement opportunities

- c. Timely review and follow-up on school bus accidents.
14. Ensure the department complies with the school board-approved organizational structure so that driver needs are supported.
 15. Review and revise job descriptions to reflect actual duties that need to be performed and assign staff with the right skill sets, in appropriate numbers, to ensure that the day-to-day functions are performed timely and effectively.
 16. Review the department's field supervision staffing levels to ensure acceptable field-operations oversight for —
 - a. Observing and supervising drivers while they are on the road
 - b. Monitoring driver check-in/check-out and bus inspections
 - c. Improving communications opportunities among transportation, parents, and school site staff.
 17. Monitor response times of school police and DoT field staff to calls from drivers needing assistance and establish criteria for the types of calls to be handled by school police and types of calls to be handled by DoT staff.
 18. Establish uniform definitions and protocols when drug testing is required.
 19. Divest the District of the risks and liabilities associated with park-outs.
 20. Conduct an employee classification and compensation study that analyzes job classifications, salaries, and benefit structures in comparison to other similar organizations, so the department can compete for and retain employees.
 21. Continue investing in opportunities to make the district a more attractive employer by —
 - a. Reducing the number of steps in the salary schedule
 - b. Accelerating starting-step placement by factoring-in prior experience at the time of onboarding²⁵
 - c. Allowing retired drivers to work at school-startup periods and on high driver absentee days²⁶

²⁵ The current CBA credits up to seven (7) years previous experience only after the completion of probation.

²⁶ These days are typically paydays, Monday, Friday, and the day before and after holidays.

- d. Creating professional development opportunities, and create pipelines for career development within the organization.
22. Explore the feasibility of the district's recovering the cost of training from drivers that voluntarily resign within their first year (or 18 months) of employment.
 23. Require the DoT to become the "owner" and the Human Resources Division to become the primary "supporter" of recruitment and onboarding of bus drivers and the overall driver shortage. Together, they should–
 - a. Maintain and track the number of driver vacancies at all times, which drive recruiting and training efforts and position control
 - b. Study the successes of peer districts' onboarding and training methods, and identify and adopt processes that can be implemented at HCPS
 - c. Create a flowchart and realistic timeline that reduces the number of steps required from recruitment to onboarding. (Redundancies should be identified and eliminated, the number of "hands" involved in the process should be reduced, and opportunities for "fast-tracking" should be implemented)²⁷
 - d. Identify the department that "owns" each step (The majority of steps should be owned by the DoT²⁸)
 - e. Appoint one individual from each organization (DoT and HR) who will have the authority and be held accountable for the timely completion all processes within their organizations. Together, these two individuals should be charged with the responsibility of ensuring that the DoT is fully staffed. Bi-weekly status reports should be forwarded to the Chief HR Officer and DoT General Manager
 - f. Track all costs associated with recruiting, training, and onboarding for purposes of future budgeting justifications.
 - g. Evaluate the benefit of the district's covering the costs of candidate physicals and fingerprinting. Recover this cost through payroll deductions only from applicants who are hired during their first 120 (or 180) days of employment
 - h. Establish exit interview protocols for DoT employees who voluntarily separate from HCPS, and identify and track the causes in order to identify opportunities for changes in policy or practice

²⁷ For example, candidates can be trained and tested while waiting for background information to be received. Additionally, determine if fingerprinting and physicals can be conducted much earlier in the process.

²⁸ The team recommends that the majority of background checks be evaluated by DoT.

Review of the Transportation Department of the Hillsborough County Public Schools

- i. Plan and staff recruitment opportunities and fairs by leveraging mass communication opportunities and social media. Consider using Blackboard Connect to invite parents to join the “team”
 - j. Design strategies to assist applicants who are not computer savvy to be able to navigate the required on-line application process.
24. Develop succession planning within the DoT to ensure knowledge transfer and the orderly transition of responsibilities.

PALM BEACH TRANSPORTATION REPORT



Review of the Transportation Department, School District of Palm Beach County

Winter 2016

Dr. Robert Avossa, Superintendent of the School District of Palm Beach County, requested that the Council of the Great City Schools (CGCS) provide a high-level review of its Transportation Services Department and develop recommendations that would help the department achieve renewed credibility and improve its overall operations in order to become more effective.¹ Specifically, he requested that the Council—

- Review and evaluate the leadership management, organization, and operations of the district’s Department of Transportation Services (the department).
- Develop recommendations that would help build a customer friendly, cost-effective, and efficient student transportation program that would be better able to respond to changing demands and challenges.

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.)

Project Staff

Robert Carlson, Project Director
Director, Management Services
Council of the Great City Schools

Richard Jacobs, Principal Investigator
Director of Transportation (Retired)
Boston Public Schools

James Beekman
General Manager Transportation
Hillsborough County Public Schools

¹ The Council has conducted nearly 300 instructional, management, and operational reviews in over 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 E lists the reviews that the Council has conducted.)

Review of the Transportation Services Department of the School District of Palm Beach County

Nathan Graf
General Manager, Transportation Services
Houston Independent School District

David Palmer
Deputy Director, Transportation (Retired)
Los Angeles Unified School District

Steve Simmons
Director, Transportation Services
Columbus City Schools

Lynn Simpson
Executive Director, Transportation
Fulton County Schools

Madeline Minichiello
Route Manager
Broward County Public Schools

Patricia Snell
GM, Transportation Services
Broward County Public Schools

The team reviewed documents provided by the district prior to a four-day site visit to Palm Beach County, Florida on October 20-23, 2015. (The complete working agenda for the site visit is presented in Attachment B.)

The team met with Superintendent Robert Avossa and Chief Operating Officer Michael Burke during the evening of the first day of the site visit to discuss expectations and objectives for the review and to make final adjustments to the work schedule. The team used the second and third days of the site visit to conduct interviews with key staff members (a list of individuals interviewed is included in Attachment C), examine additional documents and data, (a complete list of documents reviewed is included in Attachment D), and observe department operations.²

The final day of the visit was devoted to synthesizing and refining the team's findings and recommendations, and providing the Chief Operating Officer with a briefing on the team's preliminary observations and proposals.

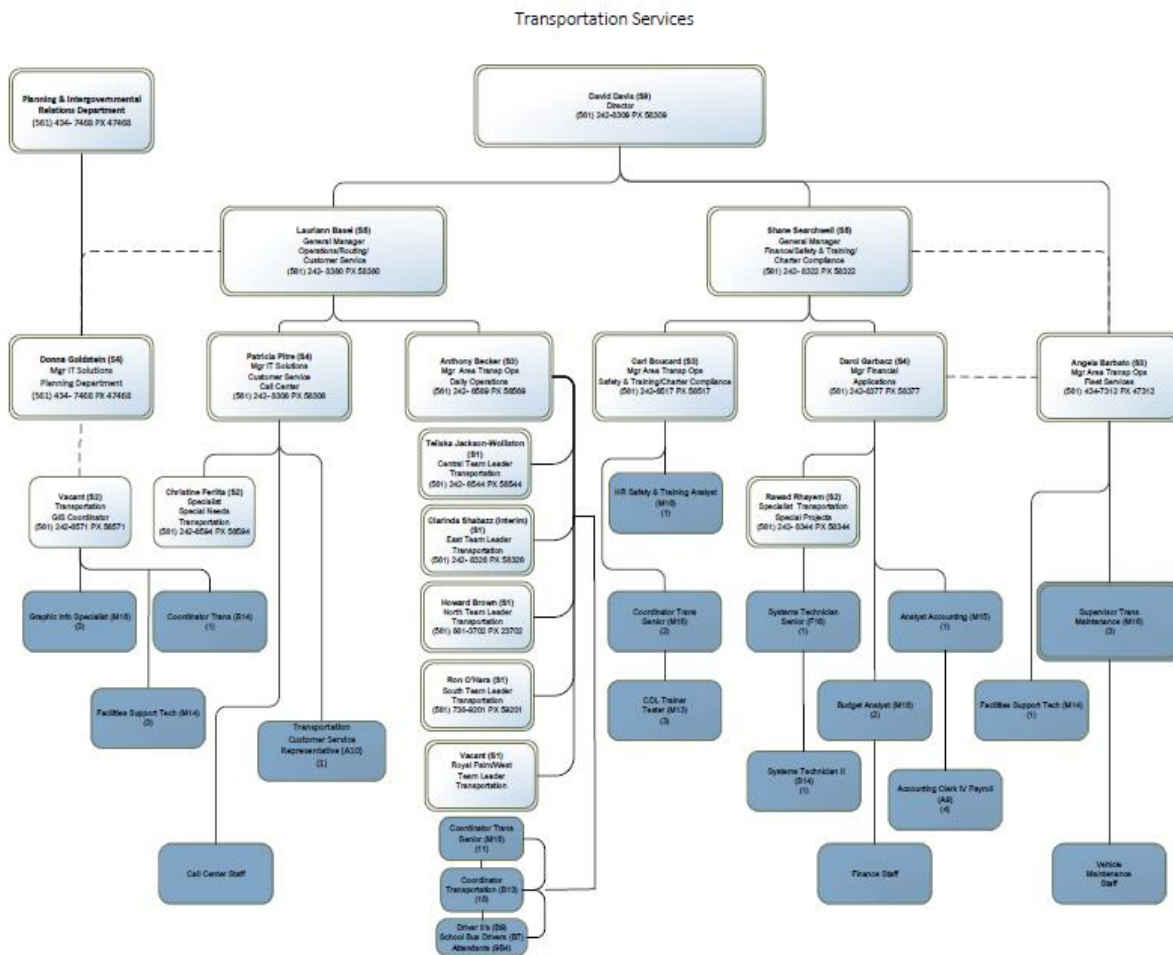
The Council sent the draft of this document to team members for their review in order to affirm the accuracy of the report and to obtain their concurrence with the final recommendations. This management letter contains the findings and recommendations that were designed by the team to help the district's Department of Transportation Services achieve improved management, greater effectiveness, renewed department credibility, and sustainability.

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.

Transportation Department

The Transportation Services Department reports to the Chief of Support Operations who is a direct report to the district’s Chief Operating Officer. The Department Director has three direct reports: the General Manager for Operations, Routing and Customer Service; the General Manager for Finance, Safety & Training and Charter Compliance; and the Manager of Area Transportation Operations and Fleet Services, who is also an indirect report to the Manager of Financial Applications. Exhibit 1 presents the department’s organizational structure.

Exhibit 1. Transportation Department Organization Chart



The Transportation Services Department operates with a total FY 2016 budget of \$54,339,928, which includes \$46,419,787 in General Funds and \$7,900,141 in a Capital Maintenance Transfer. The department also employs 1,125.8 FTEs, who are located across six transportation facilities. Exhibit 2 displays the budget and staffing levels of the department and changes that have taken place since FY 2015.

Exhibit 2. Transportation Services Department Fund 2015-16 Budget & Staffing Levels

General Fund Account	Budget			Staffing Levels (FTE)		
	FY 2015	FY 2016	Change	FY 2015	FY 2016	Change
511000 Administration	\$ 1,247,940	\$ 1,082,637	\$ (165,303)	16.0	14.0	(2.0)
516000 Other Support	22,145,614	23,119,495	973,881	1,045.8	1,092.8	47.0
518000 Temporary	829,261	759,261	(70,000)			
519990 Overtime	1,969,411	1,283,919	(685,492)			
575000 Other Personnel		59,904	59,904			
521000 Benefits	11,443,606	11,773,005	329,399			
530000 Purchased Services	847,893	878,459	30,567			
540000 Energy Services	7,108,266	7,958,766	850,500			
550000 Materials & Supplies	109,708	148,866	39,158			
560000 Capital Outlay	40,029	53,195	13,166			
570000 Other Expenses	(612,800)	(697,720)	(84,920)			
TOTAL	\$ 45,128,928	\$ 46,419,787	\$ 1,290,859	1,061.8	1,106.8	45.0
Capital Maintenance Transfer						
Account	FY 2015	FY 2016	Change	FY 2015	FY 2016	Change
511000 Administration	\$ 76,970	\$ 78,466	\$ 1,496	1.0	1.0	
516000 Other Support	530,090	644,048	113,958	14.0	18.0	4.0
519990 Overtime		40,000	40,000			
521000 Benefits	198,575	254,058	55,483			
530000 Purchased Services	2,387,230	3,094,609	707,379			
550000 Materials & Supplies	3,900,000	3,788,960	(111,040)			
TOTAL	\$ 7,092,865	\$ 7,900,141	\$ 807,276	15.0	19.0	4.0
TOTAL - ALL FUNDS	52,221,793	54,319,928	\$ 2,098,135	1,076.8	1,125.8	49

The Transportation Services Department operates approximately 649 daily bus routes and provides services for some 58,000 eligible students at 177 schools. Additionally, the department provides services for approximately 15,000 field trips as well as transportation for after-school activities and tutorial programs each year. Bus travel spans 2,386 square miles each day, including over 18,624 stops, with vehicles operating over 12.5 million miles per year.

The Transportation Services Department maintains 1,824 district vehicles, which include 854 school buses and 970 service vehicles operated by school police, school food services, maintenance and plant operations, information technology, and a myriad of other district departments. All vehicle purchases and sales are coordinated through the Department which also maintains its own tire repair, body, upholstery shops and wrecker services. Moreover, the department is responsible for all fuel purchases at eight refueling locations, and the administration of federal drug and alcohol testing programs for employees in safety-sensitive positions and employees who operate district-owned vehicles. The department is responsible for providing countywide emergency transportation for natural-disaster evacuations in collaboration with the county’s Palm Tran and the Emergency Operations Center (EOC).

Findings and Observations

The Strategic Support Team findings, observations and recommendations are organized into four general areas—

- Commendations

- Organization
- Leadership and Management
- Operations

Commendations

- The Superintendent took rapid, remedial actions in response to the unacceptable service levels provided by the transportation department at the opening of the 2015 school year, including—
 - Assigning additional staff to the transportation function
 - Revising the 2015 routing plan
 - Increasing recruitment, hiring, and training efforts.

These remedial actions resulted in an on-time performance (as of 10/22/2015) of approximately 90 percent (up from 70 percent on-time performance during the first week of school). This improvement is approaching the median on-time performance of 99.64 percent that was reported by member school districts in the Council's Key Performance Indicators Report, 2015.³

- The individual assigned to lead the department after the 2015 school opening has proven to be an asset, with a strong sense of the operational excellence. He has also brought much-needed stability and capacity for operational improvement.
- The department has a Call Center that is well supervised under the leadership of the Manager of Customer Service, who provided the team with substantial data and is focused on acquiring an Automated Call District system and improving the process of resolving customer complaints.
- Area team leaders and line staff remain committed to their work. They are hopeful that new leadership in key positions will be stabilized so they can move forward in their work to improve transportation services for students and other stakeholders in the school district.
- The department scored in the top quartile in some of the Council's Key Performance Indicators, 2015, including—
 - Operating cost per mile
 - Cost per student
 - Miles between accidents⁴
- The managers and staff of Area Transportation Operations and Fleet Services are clearly

³ The Council's *Managing for Results*, is a Performance Measurement and Benchmarking Project that identifies performance measures, key indicators, and best practices to guide improvement of non-instructional operations in urban school districts across the nation.

⁴ The department did not report, however, on time performance and reported an average fleet age of 8.6 years, which is just above the median of 8.5. The data reported for efficient fleet utilization was well below the norm and appeared to be the result of inaccurate reporting data.

Review of the Transportation Services Department of the School District of Palm Beach County

focused on fleet replacement, routing software, and GPS and digital camera purchases that would improve efficiencies and departmental effectiveness.

Organization

- The Transportation Services Department has not been properly organized with clearly defined operational responsibilities and reporting lines. For example--
 - An employee from the Planning and Intergovernmental Relations unit was named the Project Lead and charged with selecting and implementing the district's new routing software system. The department was not at the forefront of the process.
 - Prior to the opening of this school year, the routing function was physically moved from the Transportation Services Department to a newly created GIS Routing Department that did not report to the Transportation Director.
 - The responsibilities for recruiting, on-boarding, and retaining bus drivers are split between the Human Resources and Transportation Departments, which may explain why candidates get "lost" in the hiring process.
- The constant shifting of personnel over the last several years and the failure to align job descriptions and qualifications with the actual day-to-day activities has contributed to a lack of accountability and confusion.
- Local school administrators are frustrated because they do not have a designated person in the department who they can work with to resolve transportation related issues.

Leadership and Management

- The policies of the Board of Education are only moderately clear about the line relationship between the board and superintendent. The Board through policy, for example, delegates "supervision of instruction" to the superintendent without making clear that all administrative function flows through the superintendent. The lack of clarify regarding operational authority could invite micromanagement by individual board members and compromise management's ability to make decisions that are in the best interests of the entire district. For example—
 - Supervision of instruction in the district is vested in the superintendent, who serves as secretary and executive officer of the school board and recommends to the school board any action needed. (Policy 1.012.2)
 - Board policy encourages members "to visit the schools and departments in order to be better informed concerning all phases of the school district" (Policy 1.011.4) may have resulted in an accelerated rollout of an untested routing system
 - Any request for data or other information from a school board member on topics other than school board agenda items or which requires significant staff work to prepare should have the concurrence by vote or consensus of a majority of school board

members before staff time is employed. (Policy 1.0911.5)

- The Transportation Services Department has not developed a business plan that would achieve its vision, mission, goals, and objectives and support the district's strategic plan.
- The team did not see a concerted effort to address the reasons why the Transportation Services Department has consistency ranked at the bottom of the district's quality surveys since 2010.
- There is a "friends and family" culture⁵ in the transportation department, a serious lack of communications, and "embedded silos" that undermine the chain of command from line staff to area managers, to department directors, to Chief of Support Operations, and to the Chief Operating Officer.
- It was not clear to the team what authority the Manager of Financial Applications has that would allow for allocating program costs for all budget items.
- It does not appear that the Department Director is involved in negotiating the Collective Bargaining Agreement with district drivers or has even made suggested modifications to the agreement.
- The team found no evidence that the district is seeking Medicaid reimbursement for eligible transportation services.

Operations

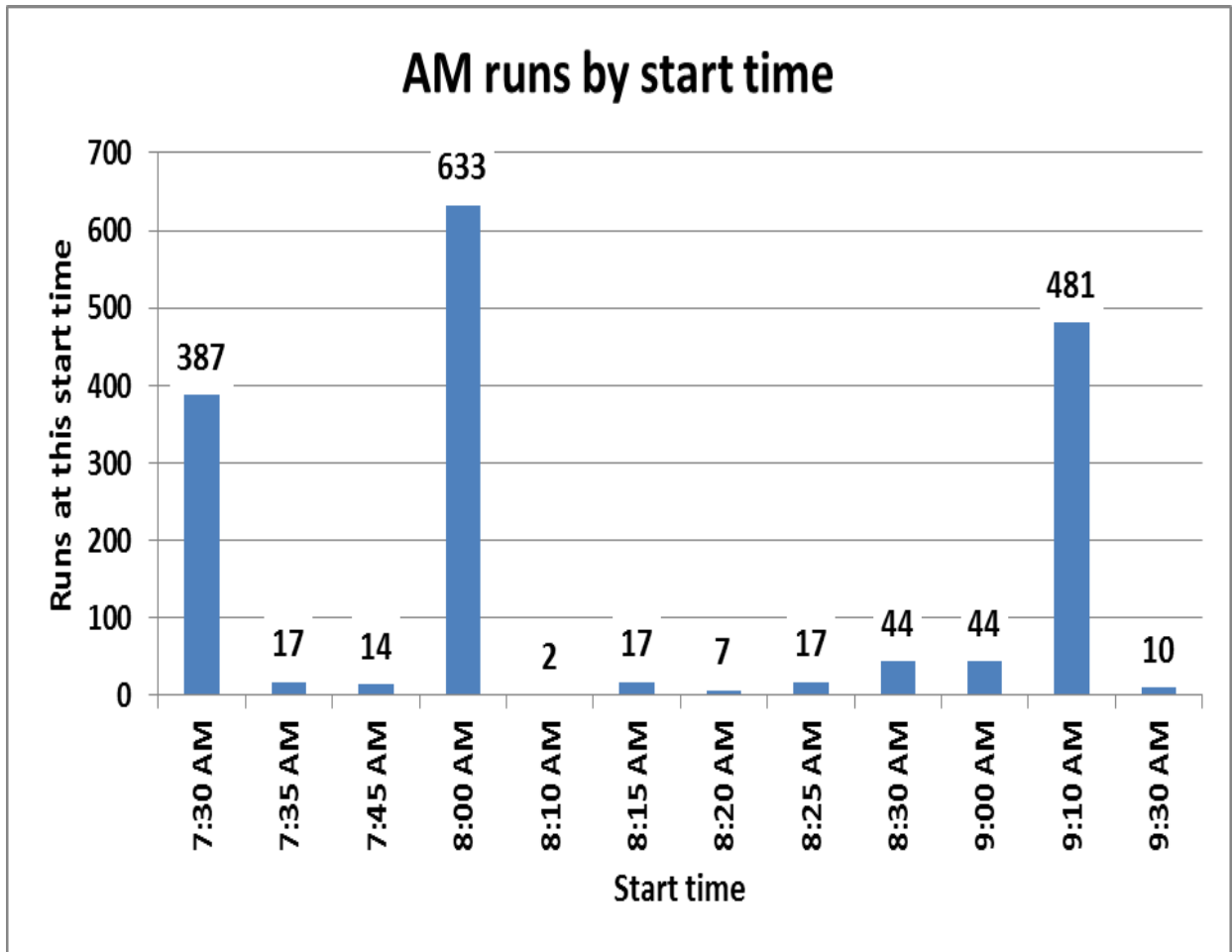
- Supervisors are required to drive routes on a daily basis because the Transportation Services Department does not have sufficient staff assigned to its field operations.
- The system the department uses to identify and track bus drivers' on-time arrival can be easily circumvented because it can't ensure that dispatchers and call center staff are aware of routes that may be running late due to bus changes.
- The team could not validate that all requests or complaints are followed up on and closed by the department's Call Center. All calls should be routinely tracked for resolution.
- The practice of allowing parents to use the district's website to select a bus stop may result in the selection of a stop that does not comply with the state's administrative code requiring a safe walk-to-stop route.⁶
- The department does not receive student assignment information during its annual planning cycle in order for it to program efficient and safe routes for special education students. For example, the Department received assignment information for half of these students during July and August, 2015, which caused significant problems integrating these students into

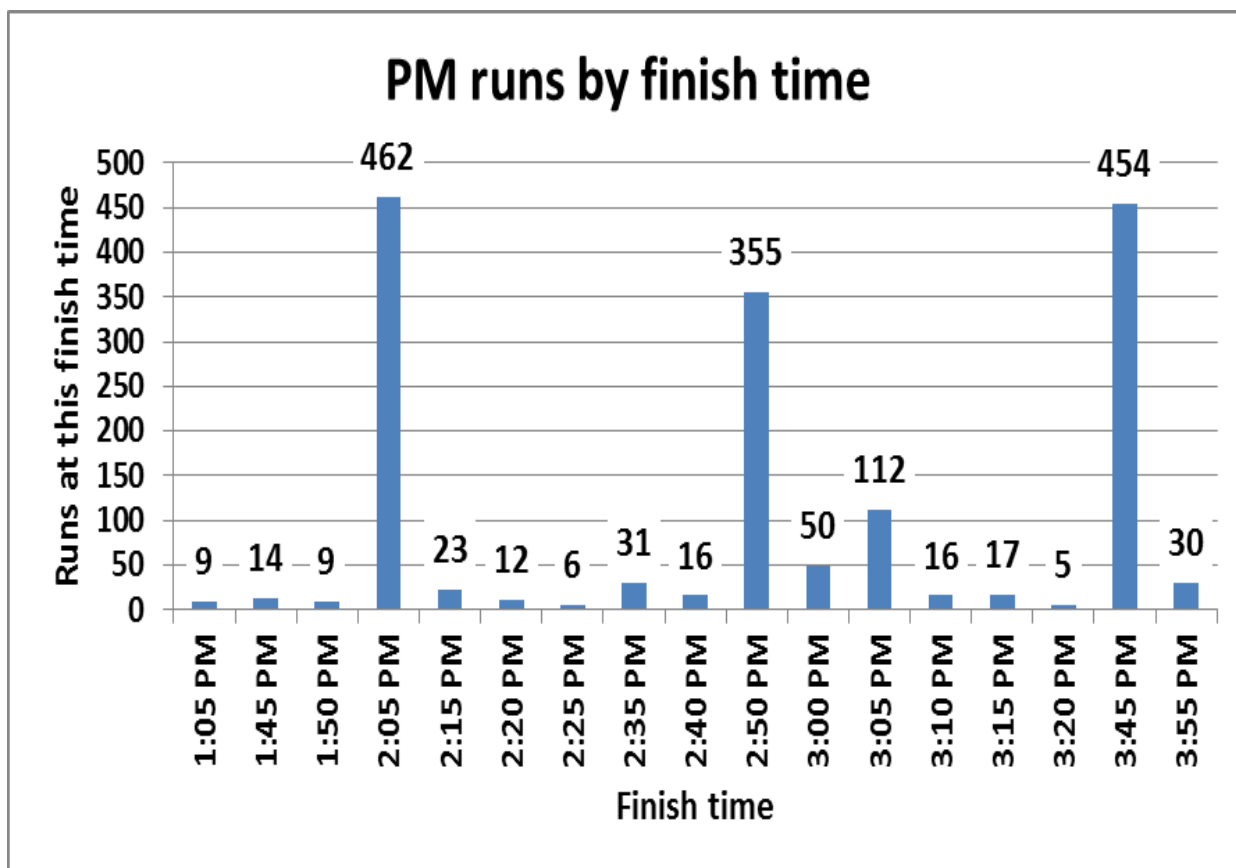
⁵ "Friends and Family" was a term the team repeatedly heard to describe the importance personal relationships play in either getting or failing to get things accomplished or to secure promotions.

⁶ State Code 6-A3001 Basic Principles for Transportation of Students.

the routing plan for the current school year.

- The team saw no evidence that the department has a formalized routing and planning methodology that utilizes standard routing procedures or best practices.
- The current schedule of school hours and bell times, and the reluctance to integrate special education and general education students within trips, has resulted in the district’s running two bus fleets, i.e., one dedicated to general education and the other to special education students, which is resulting in operating 19 more routes than were required in 2014.
- While the district appears to employ a “three tier” bell system, the reality is that it can’t maximize the benefits of a true three tier system because (1) multiple school bell times are scheduled during the day and (2) the “windows” between the tiers are not uniform because the length of the school day can vary by up to an hour. (The charts below illustrate the unequal assignment of schools to tiers and lack of conformity to the length of the school day.)





- The department uses a “mirror” routing system (the same drivers are used for morning and afternoon routes), which has the advantages of school and student familiarity with drivers, but it is not an efficient routing strategy and results in using more vehicles than necessary.
- The average walk-to-stop distances are higher in grades K-5 than they are in the upper grades. (The table below shows the straight line distance to stop by grade in miles.)

Grade	District to AM Stop	District to PM Stop
KG	0.62	0.61
1	0.61	0.59
2	0.60	0.59
3	0.61	0.61
4	0.61	0.61
5	0.63	0.62
6	0.39	0.36

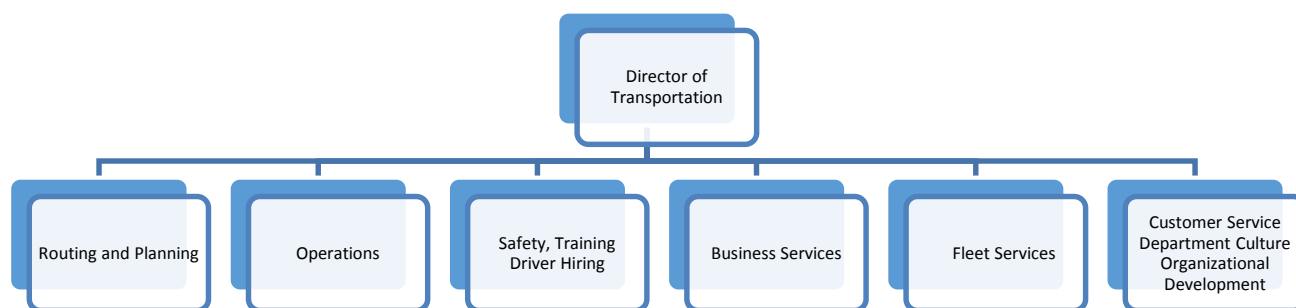
Review of the Transportation Services Department of the School District of Palm Beach County

7	0.37	0.35
8	0.35	0.33
9	0.37	0.34
10	0.37	0.34
11	0.37	0.34
12	0.39	0.36

- The department does not leverage its current software package to maximize its ability to measure and track metrics, performance, and compliance.
- It was reported that bus driver candidates get “lost” in the hiring process in the DoT, and at the time of the team visited, there may have been a backlog of 24 drivers awaiting hire.⁷
- The department maintains a 24 percent spare bus ratio, which is well above the Great City Schools median of 15 percent, but apparently close to the norm among large Florida districts. The high spare factor may be related to the age of the district fleet, along with challenges posed by the extensive up keep required to maintain air conditioning and some model diesel engines.
- Interviews with fleet services staff members indicate that they are clearly focused on fleet improvements and the 100 percent availability of buses, but they also recognize that the shortage of buses could be a problem if driver staffing were at 100 percent.

Recommendations

1. Flatten the Transportation Services Department organization by expanding the director’s span of control with clearly defined operational responsibilities. (A proposed high level organizational chart is provided below.)



⁷ The Team relayed this information to senior staff for follow up.

Review of the Transportation Services Department of the School District of Palm Beach County

2. Establish a function in the Transportation Service Department dedicated solely to driver recruitment, safety, and training, and assign a manager to the position with the skill set necessary to coordinate all activities associated with the process.
3. Revise all job descriptions to reflect actual duties and assign staff with the right skill sets and in appropriate numbers so that day-to-day functions are performed effectively in the new organization.
4. Conduct an Employee Classification and Compensation Study that analyzes job classifications, salaries, and benefit structures in comparable organizations so the department can compete for and retain employees, particularly bus drivers.
5. Reorganize the operations function so schools have a specific contact person who is empowered to resolve transportation issues at the local school level.
6. Establish school board policy to ensure that board members are focused at the policy level and not micro-managing day-to-day operations.
7. Develop a comprehensive departmental business plan with goals and objectives, benchmarks, performance measures, accountabilities, and costs that support the district's strategic plan and include timelines and process descriptions for these activities –
 - a. Annual route planning
 - b. Receipt of student data (SPED and general education)
 - c. Identification of all new or moved program placements
 - d. Summer routing and program placement decisions
 - e. Budget development
 - f. Fleet replacement
 - g. Training and professional development
 - h. Technology and program initiatives
8. Assign the Manager of the Customer Service/Departmental Culture and Organizational Development with responsibilities to--
 - a. Address the causes of poor performance ratings seen in the quality surveys, ratings that the department has received in recent years.
 - b. Develop managerial strategies and training programs so employees learn to work as teams within the organization.
9. Create communication channels up and down the organization and schedule regular meetings with stakeholders at each level--meetings with specific agendas, documented minutes of discussions, and follow up activities so employees know—
 - a. The department's goals and objectives and how they will be achieved
 - b. How the department will be held accountable for and be evaluated.

10. Charge the Manager of Business Services with preparing, overseeing, and managing the department's budget and require collaboration with the district's Budget Office on—
 - a. Submitting an annual budget request that is supported by actual historical expenditures and projections for future program adjustments.
 - b. Providing monthly expenditure projections, compared with the approved budget.
 - c. Compiling transportation cost impact statements for all proposed programmatic changes or initiatives.
 - d. Maintaining a fully transparent transportation budget allowing for accurate allocation of program costs (general, SPED, white fleet) and for all budget line items (driver wages, administrative costs, fleet costs, etc.).
 - e. Capturing Medicaid reimbursements for eligible transportation services.
11. Schedule on-going meetings with appropriate department heads and driver representatives to resolve labor-related issues and compile recommendations for changes in the driver Collective Bargaining Agreement that would strengthen management rights and improve operational performance.
12. Assign sufficient staff to the department's field operations so supervisors can perform their appropriate functions, including—
 - a. Observing and supervising drivers while they are on the road
 - b. Monitoring bus inspection and report check-in/check-out processes
 - c. Identifying and tracking on-time arrival to ensure that dispatchers and call center staff are aware of routes that may be running late.
 - d. Improving communications among area managers, the Call Center, and drivers so there is accurate information regarding route delays in order for parents and school staff to be notified when delays occur and problems can be resolved in a timely manner.
13. Upgrade the department's telephone and communication system to include an Automated Call Distribution System to ensure all service requests or complaints are followed up on and closed satisfactorily by the department. Specific functions to be considered in the upgrade include the ability to--
 - a. Create voice menus that route calls to appropriate departments
 - b. Establish priority queuing
 - c. Monitor calling queue and open lines as necessary
 - d. Track and monitor all ingoing and outgoing calls
 - e. Add available agents during peak periods or during emergencies
 - f. Compile management reports such as calls received, average wait time, abandoned calls, etc.
14. Eliminate the use of any system that allows parents to choose bus stops that do not ensure a

safe walk path.

15. Create an interdepartmental Department of Transportation Services and special education committee and require that it provide the superintendent and Chief Operating Officer with strategies, actions, and timelines to--
 - a. Ensure that all special education assignments are transmitted to the department in a timely manner during both the school year and in anticipation of summer sessions and the new school year.
 - b. Establish clear criteria for determining whether a student requires both curb-to-curb service and assignment to a vehicle that is only transporting other disabled students.
 - c. Integrate special needs students with their non-disabled peers and design routes to accommodate both corner and curb-to-curb stops to the extent possible.

16. Optimize the department's current routing technology and use "routing best practices" to develop a comprehensive and uniform approach to route planning that includes—
 - a. Setting ridership goals
 - b. A uniform application of walk-to-stop distance
 - c. Assigning vehicles to garages to minimize deadhead time
 - d. Constructing routes based on current, actual, and expected ridership
 - e. Scheduling arrival and departure routes as separate rider groups
 - f. Optimizing trip pairings by assigning routes by proximity rather than mirror "in and out" on the same bus
 - g. Gauging actual route times *versus* planned times, and adjust routing software as necessary throughout the school year.
 - h. Producing routes that can be reviewed, bid, and dry run--so adjustments can be made and parents and schools can be notified well before the opening of school.

17. Develop school bell schedules that will result in maximum utilization of the bus fleet for the 2017-2018 school year. This would entail--
 - a. Aligning starting times so that an equal number of buses can be scheduled on each of the three bell tiers.
 - b. Require a combination of changes that may include an elementary, middle or high school assigned to any of the tiers, changes in the length of school day, and adjustments to the early release schedules.

18. Conduct a comprehensive fleet spare-vehicle evaluation to determine reasons for a relatively high spare factor and determine cost benefit or operational value of reducing the spare factor.

19. Update the School Bus Acquisition and Replacement plan to address the district's aging bus fleet with a special focus on--
 - a. Extending lease financing terms to a minimum of seven years with the potential of ten years and using the capital budget as a basis for the long term debt service
 - b. Reviewing bus routes to determine if there may be excess capacity on any of the 77 and 84 passenger vehicles in the fleet.

Review of the Transportation Services Department of the School District of Palm Beach County

- c. Integrating SPED students or SPED routes into the general education fleet.
- d. Using smaller school buses equipped with flat floor lift stations and integrating child safety restraint seats that can be reconfigured as routing requirements change.
- e. Increasing use of alternative fueled vehicles that can be more cost effective over the life of a bus given the long expected usable life of buses in the district application.
- f. Operating needs of the department based on actual ridership and enrollment trends.

BIRMINGHAM MEMO



1301 Pennsylvania Avenue, NW, Suite 702
Washington, DC 20004

January 28, 2016

Memorandum To: Dr. Kelley Castlin-Gacutan
Superintendent
Birmingham City Schools

From: Robert Carlson
Director, Management Services
Council of the Great City Schools

CC: Michael Casserly
Executive Director
Council of the Great City Schools

I had a productive meeting and discussion with Sharon Roberts, the district's Chief Financial Officer. Thank you for scheduling that; I appreciate the time she made available.

We also had a Conference Call with Fred Schmitt, the retired Chief Financial Officer for the Norfolk Public Schools, who is the Principal Investigator for the Council's Strategic Support Team, which will be reviewing the district's budget and its budgetary operations. We apologize for having to cancel the recently scheduled review, but the recent winter storm created severe travel problems for critical members of the team. I know you understand.

On the basis of this morning's discussions, we think there are two equally important steps you could take which would be the foundation for preparing the FY 2017 budget and developing a longer term strategy to improve your overall financial status.

The first step would be to develop a framework for sound fiscal management, beginning with the creation of "expenditure controls" to ensure that the district does not need to draw down on its fund balance (or reserves) or incur a budget deficit. To effectively control expenditures, you, as superintendent, need to be confident that the financial system (chart of accounts) is capable of accurately capturing "how" much of the district's resources are being

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expended. As you build confidence in the system, you can then explore “where” you are disbursing funds from the initial budget development all the way through to final disbursement.

Acquisition processes and personnel management are critical to effective expenditure control because their associated costs consume the bulk of all district expenditures. It is our understanding that the Chief Financial Officers has already taken steps to bring the acquisition of goods and services under control and we applaud her for this effort.

As noted in the Council’s June 2015 review of the district’s financial operations, however, the current position-control system, which resides in the Human Resources Department, is underutilized and not capable of controlling these costs. You should not need to wait for the Council’s Strategic Support Team’s visit next month to move the position control system to the Business and Finance Department (which was recommended during our June visit and is considered a “best practice”), where the ERP system could be leveraged to create a robust and accurate method of controlling personnel costs at both the program and organizational levels. This approach can also be used to control expenditures in other cost centers.

The importance of achieving “expenditure control” rests in its ability to create a reliable database for understanding “how” district resources have been expended and at what level, so you and the Board of Education can take the second step, namely making informed decisions about “where” resources should be targeted, repurposed, reprogrammed, or reallocated (i.e., “resource control”) in order to achieve maximum benefits and avoid misdirected allocations. This will be the focus of the Strategic Support Team work during its visit next month. We will do a deep dive into where resources have and continue to be expended and will formulate recommendations to help you in this effort. In the meantime, please consider moving the position control system organizationally.

Please let me know if you would like us to proceed or if additional information may be required in order to do so.

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HISTORY OF STRATEGIC SUPPORT TEAMS

History of Strategic Support Teams of the Council of the Great City Schools

The following is a history of the Strategic Support Teams provided by the Council of the Great City Schools to its member urban school districts over the last 15 years.

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
	Information Technology	2016
	Human Resources	2016
Anchorage		
	Finance	2004
	Communications	2008
	Math Instruction	2010
	Food Services	2011
	Organizational Structure	2012
	Facilities Operations	2015
	Special Education	2015
	Human Resources	2016
Atlanta		
	Facilities	2009
	Transportation	2010
Austin		
	Special Education	2010
Baltimore		
	Information Technology	2011
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010
	Human Resources	2014
	Financial Operations	2015
Boston		
	Special Education	2009
	Curriculum & Instruction	2014
	Food Service	2014
	Facilities	2016

Bridgeport		
	Transportation	2012
Broward County (FL)		
	Information Technology	2000
	Food Services	2009
	Transportation	2009
	Information Technology	2012
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	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		
	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012
	Bilingual Education	2014
Christina (DE)		
	Curriculum and Instruction	2007
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000

	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
Columbus		
	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		
	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
	Special Education	2015
	Bilingual Education	2015
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
Guilford County		
	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
Hillsborough County		
	Transportation	2005
	Procurement	2005
	Special Education	2012
	Transportation	2015
Houston		
	Facilities Operations	2010
	Capitol Program	2010
	Information Technology	2011
	Procurement	2011
Indianapolis		
	Transportation	2007
	Information Technology	2010
	Finance and Budget	2013
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006

	Facilities operations	2015
	Budget and finance	2015
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 study	2009
Memphis		
	Information Technology	2007
	Special Education	2015
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		

	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
Nashville		
	Food Service	2010
	Bilingual Education	2014
Newark		
	Curriculum and Instruction	2007
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
	Curriculum and Instruction	2012
Orange County		
	Information Technology	2010
Palm Beach County		
	Transportation	2015
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003
	Human Resources	2004
	Budget	2008
	Human Resource	2009
	Special Education	2009
	Transportation	2014
Pittsburgh		
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
Portland		
	Finance and Budget	2010
	Procurement	2010

	Operations	2010
Prince George's County		
	Transportation	2012
Providence		
	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	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

2015-2016

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

**AWARD FOR EXCELLENCE IN FINANCIAL
MANAGEMENT**



1301 Pennsylvania Avenue, NW, Suite 702
Washington, DC 20004

The Council of the Great City Schools

Award for Excellence in Financial Management

- ✓ While organizations such as GFOA and ASBO provide standards for excellence in financial reporting and budget presentation, there are no national standards for recognizing excellence in financial accountability and controls that are needed to safeguard and protect the financial integrity of a school district.
- ✓ Unlike the GFOA and ASBO awards, which focus on data content and format, the *CGCS Award for Excellence in Financial Management* focuses on policies, procedures and outcomes across a broad range of financial areas.
- ✓ A rigorous “Best of Financial Management Practices Peer Review” process assesses a district’s financial management practices; and “Key Performance Indicators” are used as an evaluative research and objective analytical baseline to demonstrate the efficient and effective use of financial resources.
- ✓ The Council recognizes the Office of Program Policy Analysis and Governmental Accountability (OPPAGA) in Florida and The Stupski Foundation for sharing criteria used for this award.

For Service or More Information Contact:



Robert Carlson

Director, Management Services

Office > (202) 393-2427 Cell > (202) 465-1897 Email > rcarlson@cgcs.org



1301 Pennsylvania Avenue, NW, Suite 702
Washington, DC 20004

Award for Excellence in Financial Management

About the Program

The Council of the Great City Schools' (CGCS) established the *Award for Excellence in Financial Management* in 2008 to recognize Council member districts that support the highest standards in financial accountability and controls that are needed to safeguard and protect the financial integrity of the district. These efforts reflect an extraordinary dedication to excellence in financial management and demonstrate outstanding stewardship of taxpayer dollars with the ultimate beneficiaries being the children of their districts.

Review Process

Council member school districts participating in the awards program complete an assessment form and supply supporting documentation to demonstrate they comply with a series of management practices that represent the highest standards in financial accountability and control in nine categories. After a preliminary review, a panel of highly respected subject-matter experts from major urban school systems across the country is chosen to review the assessment form and supporting documentation. The review process also entails a site visit to interview the district's administrative staff and review any additional documentation that may be required.

Review Period

Applicants must email the official assessment form and supporting documentation to Robert Carlson, Director of Management Services at rcarlson@cgcs.org by February 28, 2016. The program staff will provide participants with notification of award or reasons for denial.

For Service or More Information Contact:



Robert Carlson

Director, Management Services

Office > (202) 393-2427 Cell > (202) 465-1897 Email > rcarlson@cgcs.org

Financial Management Practices

A. GENERAL FINANCIAL MANAGEMENT STANDARDS	YES	NO	Documentation¹
1. Mandatory Structure, Staffing and Training Practices			
1.a. The Financial Services Department has an approved organizational structure with functions appropriately segregated to control for each of the following --			
• Budgeting			
• Expenditure control and reporting			
• Financial Reporting			
• Procurement, receipt of goods and services, and accounts payable			
• Salary setting, attendance reporting and payroll processing			
• Risk Management and Treasury functions			
1.b. The position descriptions for financial services positions contain appropriate education and experience requirements.			
1.c. Financial services units are appropriately staffed to ensure effective delivery of financial services.			
Recommended Structure, Staffing and Training Practices			
1.d. Financial services staff are cross-trained for critical accounting processes.			
1.e. Financial services staff and decentralized managerial and accounting staff receive periodic training and professional development.			
1.f. District staff periodically analyzes cost savings of alternative financial delivery, e.g., outsourcing of selected functions.			
1.g. Staff receive periodic communications to emphasize goals and objectives			
1.h. Other Structure, Staffing and Training Practices of the Department (Enumerate and document)			
2. Mandatory Policies and Procedure Practices			
2.a. Written procedures have been developed for each of the following--			
• Identification and description of principal accounting records			
• Standard accounting and journal entries including requirements for support documentation			
• Identification of positions that approve accounting and journal entries prior to entry			
• Instructions for determining cut-off and closing of accounts for each accounting period.			
2.b. The district has approved ethics policies for district financial staff.			
2.c. The district periodically evaluates and updates its Procedures Manuals for each financial area			
Recommended Policies and Procedure Practices			

¹ Supporting documentation (e.g., policies, procedures, etc.) is required to substantiate the practice.

2.d. The district has established written procedures for confidential reporting of alleged improprieties.			
2.e. Other Policies and Procedure Practices of the Department (Enumerate and document)			
3. Mandatory Financial Systems and Reporting Practices			
3.a. The district's financial components have integrated software systems that minimize manual processes for each of the following functions--			
• Efficient decentralized and one-time data entry			
• Capital projects tracking by and across fiscal years			
• Automated reconciliations between control accounts and subsidiary records			
• Direct deposit program for payrolls			
• Availability of a position control system for full-time positions reconciled to the approved budget			
• The capacity to generate a variety of ad-hoc analyses and simulations.			
3.b. The accounting system facilitates accountability for restricted sources of funds through fund/grant/project control.			
3.c. District financial staff provide the board and district management with monthly and annual financial reports in an easy-to-understand summary format.			
3.d. District financial staff provide effective information to the board and management on funding sources, budget limitations, and financial impacts relating to major program and contract proposals.			
Recommended Financial Systems and Reporting Practices			
3.e. The district uses computerized requisition control procedures and minimizes multiple non-originator approvals of requisitions within defined dollar thresholds.			
3.f. District staff analyze financial accounting, control, and reporting procedures to minimize duplication of efforts and non-value added activities.			
3.g. District managers receive periodic (at least monthly) reports and can electronically view data showing budget vs. expenditure information for their area of responsibility.			
3.h. District financial staff analyze contract proposals and other financial negotiations, especially those involving significant dollar limitations to the district.			
3.i. District financial staff analyze major expenditures in cost and report findings to management.			
3.j. Other Financial Systems and Reporting Practices of the Department (Enumerate and document)			
B. INTERNAL CONTROL STANDARDS	YES	NO	Documentation
4. Mandatory Internal Control Practices			
4.a. The district has an Internal Audit function or Inspector General which examines both central office and school based financial operations.			
4.b. The district takes steps to resolve or correct, and prevent the reoccurrence of any significant weakness in internal, controls, fraud, mismanagement, or financial misstatement identified by the district's external auditor, any federal or state audit, internal audit, law enforcement agency, or other review group.			
4.c. The district has established significant controls over receipting processes for each of the following functions--			

• Timely depositing and recording of collections			
• Recording of collections to the correct accounting codes			
• Compliance with federal, state, and local (if applicable) laws, rules, and policies			
4.d. The district has established effective controls over payroll processes for each of the following functions--			
• Appropriate and timely reporting of federal and state payroll taxes			
• Appropriate and timely reporting of other payroll deductions, e.g., insurance premiums			
• Proper charging of salary costs to the correct account codes			
4.e. The district has established effective controls over accounts payable for each of the following functions--			
• Payments are for authorized purposes, have sufficient budgetary authority with pre-purchase order verification of funds availability			
• Payments are supported by evidence that goods and services were received			
• Payments are supported by original vendor invoices			
• Disbursements are charged to the proper account codes			
4.f. The district has instituted procedures to minimize the incidence of check fraud through each of the following measures--			
• Use of check stock with security features			
• Positive pay			
• The securing of check stock			
4.g.. The district has written policies and procedures with instructions on employee responsibilities for P-card transactions with written acknowledgements signed by employee.			
Recommended Internal Control Practices			
4.h.. Vendor invoices and potential upcoming payments are systematically aged and periodically reviewed to maintain a reasonable vendor paying cycle.			
4.i. The district has a contract with a Bad Check Collection Agency			
4.j. The district has a systematic processes to identify duplicate invoicing			
4.k. The district utilizes electronic procedures for the payment of significant vendor, deduction, and retirement transactions, including the use of appropriate controls.			
4.l. The district uses automatic pay-deposit for its payrolls.			
4.m. The district has a comprehensive ethics policy.			
4.n. Other Internal Control Practices of the Department (Enumerate and document)			
C. BUDGET, STRATEGIC PLANNING AND MANAGEMENT STANDARDS	YES	NO	Documentation
5. Mandatory Budget Practices			
5.a. The district produces and adopts an annual budget that provides useful and understandable information to board members and stake-holders.			
• Budgets are prepared and adopted pursuant to applicable state law and local ordinances (if fiscally dependent).			
• District staff use appropriate revenue-estimating practices, including prior-year comparisons, program and enrollment criteria, and formal historic trend analyses.			

<ul style="list-style-type: none"> • The district uses an annual and long-range (three-five years) budget planning process and timeline that is clearly communicated to involved stakeholders, including a clear statement of program and financial assumptions and proposed policies. 			
<ul style="list-style-type: none"> • The district systematically reviews and analyzes interim fiscal year expenditure activity and school and departmental budget amendments and prepares formal budget amendments for board approval at least on a quarterly basis. 			
<ul style="list-style-type: none"> • The district prepares, adopts, and formally updates on an annual basis a five-year capital spending plan, providing both revenue estimates and proposed capital projects, including the effects of proposed capital projects on the operating budget. 			
5.b. The district allocates resources to schools based upon objective district wide program and enrollment criteria adopted by the board and available for review by all stakeholders.			
5.c. Schools and department level budgets and expenditure data are available to all stakeholders in an understandable format.			
Recommended Budget Practices			
5.d. The district's strategic plan for improving student achievement and performance is clearly present in district budget planning.			
5.e. The district permits schools and departments to effect budget amendments online (within fund and designated programs) up to defined dollar thresholds using automated procedures with embedded decision rules.			
5.f. The district successfully participates in juried budget presentation reviews, such as the Government Finance Officers Association (GFOA) Outstanding Budget Presentation Award or the equivalent program administered by the Association of School Business Officials (ASBO).			
5.g. Other Budget Practices of the Department (Enumerate and document)			
6. Mandatory Strategic Planning Practices			
6.a. The district's strategic plan includes a provision for maintaining adequate levels of unreserved fund balance adopted by the board.			
Recommended Strategic Planning Practices			
6.b. The district's strategic plan objectives can be tied to specific departments or projects and provide guidance for budget decisions.			
6.c. School principals and the district budget officials include relevant stakeholder and community input when developing school-level and district plans and budgets.			
6.d. The district has incorporated review of school-level and departmental performance measures and results as a component of district-wide budgetary decision making.			
6.e. The budget document includes a discussion of how the Strategic Plan relates to budget.			
6.f. Evidence that results relating to performance measures is included in the departmental section of the budget document.			
6.g. Other Strategic Planning Practices of the Department (Enumerate and document)			
D. INTERNAL AND FINANCIAL (External) AUDITING STANDARDS	YES	NO	Documentation
7. Mandatory Internal and Financial (External) Auditing Standards			
7.a. The district has established an internal audit function with its primary mission that (1) provides assurance that the internal control processes in the district are adequately			

designed and functioning effectively and (2) offers recommendations and counsel to management that will improve performance where appropriate.			
<ul style="list-style-type: none"> Employees performing the internal audit functions have adequate education and technical training necessary to ensure that due professional care is exercised in the performance of their audits 			
<ul style="list-style-type: none"> For the purposes of safeguarding cash and the protection of employees, armored car services are used for the collection of funds from sites. 			
<ul style="list-style-type: none"> Internal auditors are not limited in their access to records or on the scope of their activities 			
<ul style="list-style-type: none"> Audit programs are used by the internal auditors for each activity reviewed to document nature, timing, and extent of their audit work. 			
<ul style="list-style-type: none"> Internal auditors are functionally independent of the activities they are auditing. 			
<ul style="list-style-type: none"> Reports are issued by the internal auditors that document the scope of their work, findings management response. 			
7.b. The district ensures that it receives an annual external audit and uses the auditor management internal control findings to improve its operations.			
<ul style="list-style-type: none"> Audit reports have been filed with appropriate oversight bodies in accordance with applicable state, federal, and local (if fiscally dependent) filing requirements 			
<ul style="list-style-type: none"> Audit reports indicate that the audits were completed in accordance with Government Auditing Standards. 			
7.c. The district provides for timely follow-up of findings identified in the external audit.			
<ul style="list-style-type: none"> Procedures have been established to provide for the timely review of findings included in the external audit, development of a corrective action plan, and assurance that corrective actions are implemented. 			
<ul style="list-style-type: none"> The district performs timely follow-up of findings, develops corrective action plans, and ensures that corrective actions are implemented. 			
<ul style="list-style-type: none"> Audit findings and corrective actions are presented to the board, its designee, or the audit committee (if established) for review and approval. 			
7.d. The district obtains and reviews financial information relating to school internal accounts, direct service organizations (DSOs), charter schools, and submits summary information to the School Board for action.			
<ul style="list-style-type: none"> The district has policies and procedures to administer the school and activity funds, commonly called the school internal accounts. 			
1) The district has adopted policies and procedures for governing the receipt and disbursement of funds in the school internal accounts.			
2) The district provides for an annual audit of the school internal accounts.			
<ul style="list-style-type: none"> The charter agreement between the district and each charter school requires each charter school to provide for an annual audit of its records and specific time frames for completion of the audits. 			
Recommended Internal and Financial (External) Auditing Practices			

7.e. The district has established an external audit committee comprised of knowledgeable non-district persons, along with school board members, that meets quarterly to approve the annual audit plan, to review and receive internal audit reports, and provide resulting recommendations to the board.			
7.f. The organizational structure of the district provides that employees performing the internal audit function report directly to the district school board, or its designee (which can be the Superintendent), or the audit committee (if established) to ensure broad audit coverage and adequate consideration of, and action on the findings and recommendations of the internal auditors.			
7.g. Section of the auditing firm must be done pursuant to an RFP. Plan for the external auditor firm rotation every five years. If the RFP is in excess of 5 years, the partner and manager must rotate.			
7.h. The recommended external auditor meets with the school board or the audit committee prior to the start of the audit to have the audit plan, timeline, and costs reviewed and approved. Allow school board members (audit committee) to discuss areas of concern			
7.i. The district publishes an audited Comprehensive Annual Financial Report (CAFR) within six months of the conclusion of its fiscal year.			
7.j. The district successfully participates in a juried review of its CAFR such as the Excellence in Financial Reporting Award of the Government Finance Officers Association (GFOA) or the equivalent program administered by the Association of School Business Officials (ASBO).			
7.k. Audits of the school internal accounts are presented to the school board (or audit committee) in session and are filed as part of the public record.			
7.l. Corrective action plans are developed to timely correct audit findings noted in their audit reports for school internal accounts.			
7.m. Multi-year, risk based, audit programs; are prepared for the school board (or audit committee) for review and approval. A budget for the proposed costs are defined and year one's budget is approved.			
7.n. Other Internal and Financial (External) Auditing Practices of the department (Enumerate and document)			
E. TREASURY STANDARDS	YES	NO	Documentation
8. Mandatory Treasury Practices			
8.a. The district has appropriate written policies and procedures for cash management (if its financial functions include cash management) that include each of the following--			
<ul style="list-style-type: none"> • Central authority over payment activities is established including opening bank accounts, determining payment methods, segregation of duties, set-up and origination of electronic payments, security administration over banking systems, etc. 			
<ul style="list-style-type: none"> • The district maintains its cash deposits in qualified public depositories with collateral held by independent third party institutions at adequate margin levels either through a statewide or program. 			
<ul style="list-style-type: none"> • All collections are timely deposited and invested with adequate dual control utilized and deposited manually. 			
<ul style="list-style-type: none"> • District staff that do not have the ability to execute transactions or update accounting records perform bank reconciliations. 			

	<ul style="list-style-type: none"> When corrections to accounting records are required they are performed in a timely manner by staff not preparing bank reconciliations. 			
	<ul style="list-style-type: none"> Appropriate management staff periodically review bank reconciliations and investigate un-reconciling items. 			
	<ul style="list-style-type: none"> The district has prepared and utilizes a cash budget, forecasting its incoming revenue receipts and cash disbursements on a daily/weekly basis depending on volume and major investments with anticipated cash flow requirements. 			
	<ul style="list-style-type: none"> Banking agreements should be reviewed by District's attorney to clearly delineate responsibilities and liabilities, especially as it relates to fraudulent transactions, whereby shifting of liabilities from the bank to the District should be avoided 			
	<ul style="list-style-type: none"> Discrepancies are investigated timely and when bank fraud or errors are determined they are reported promptly to bank and to appropriate management staff 			
	<ul style="list-style-type: none"> Banking contracts are periodically analyzed to review terms and fee schedules. 			
8.b.	The district has written investment guidelines when it invests its surplus cash (if a district function) that include each of the following--			
	<ul style="list-style-type: none"> The district's investment policy provides specific direction regarding the use of derivatives and other synthetic investments as well as authorized investments types, and maturities and concentration limits. with maturities greater than six months. 			
	<ul style="list-style-type: none"> The district periodically reports to the board the results of its investing activities at least on a quarterly basis. 			
	<ul style="list-style-type: none"> District staff analyzes the credit, concentration and interests rate risk of the investment versus its projected returns. 			
Recommended Treasury Practices				
8.c.	Banking services contracts are periodically negotiated to protect the school district and ensure that their terms and conditions are more beneficial than those previously offered.			
8.d.	Banking contracts are rebid or compared to recent contracts of comparable governmental entities at least every five years with district responsibilities and liabilities clearly delineated and communicated to appropriate staff.			
8.e.	The district has established an investment advisory committee comprised largely of informed non-district persons to advise the district on investment policies and to review investment activities.			
8.f.	District staff is knowledgeable and receive training at least annually on treasury practices such as investments, cash management, and banking services.			
8.g.	The district annually reviews all recommended bank products and services to ensure new technologies and solutions, such as automatic account reconciliation services, are being considered for adoption by Treasury staff			
8.h.	Bank fees and charges are itemized and invoiced, rather than offset with compensating balances.			
8.i.	Other Treasury Practices of the Department (Enumerate and document)			
F. CAPITAL ASSET MANAGEMENT STANDARDS				Documentation
9. Mandatory Capital Asset Management Practices				

9.a. The district has established written policies and procedures and periodically updates them to provide for effective management of capital assets.			
• The district is compliant with the provisions of GASB 34.			
• The district has implemented effective procedures to ensure that capital outlay purchases appropriately capitalized that include each of the following--			
1) District capitalization thresholds are consistent with federal requirements for assets purchased with federal funds and state requirements for all other assets.			
2) The district reconciles capital asset expenditures with additions to capital assets.			
• The district has established effective policies and procedures for the disposal of excess, surplus, and salvage capital assets.			
• The district maintains detailed subsidiary records of capital assets.			
• The district physically safeguards and tags capital assets.			
• The district has established and carries out appropriate procedures to follow up on missing capital items.			
• The district appropriately accounts for capital assets acquired with federal and restricted source funds.			
Recommended Capital Asset Management Practices			
9.b. The district annually conducts a physical inventory of capital assets using cost-effective methods, such as bar-coding.			
9.c. Other Capital Asset Management Practices of the Department (Enumerate and document)			
G. DEBT MANAGEMENT STANDARDS	YES	NO	Documentation
10. Mandatory Debt Management Practices			
10.a. The district has established written policies and procedures regarding the issuance of debt and periodically updates them to provide for effective debt management (if this is a district function) that include each of the following--			
• The district tracks debt services requirements and ensures timely payment.			
• The district is knowledgeable about debt service reporting requirements, e.g., continuing financial disclosures pursuant to Securities and Exchange Commission requirements, and has established procedures to ensure adequate and timely reporting.			
• The district complies with federal (Internal Revenue Service) arbitrate requirements..			
• The district complies with bond covenants.			
• The district employs debt affordability periodic reviews that include targeted projected maximum annual debt service payments as a percentage of projected revenues and targeted debt amortization percentages.			
Recommended Debt Management Practices			
10.b. The district's debt management practices are consistent with rating agency's analysis of debt affordability.			
10.c. The district maintains a balance in its reserves for debt services equivalent to at least one year's debt services in advance.			

10.d. The district maintains contact with credit-rating agencies and bond insurers to provide continuing financial information about its credit-worthiness.			
10.e. Other Debt Management Practices of the Department (Enumerate and document)			
H. RISK MANAGEMENT STANDARDS			Documentation
11. Mandatory Risk Management Practices			
11.a. The district has established written policies and procedures regarding the issuance and types of insurances purchases, the funding and administration of any and all self-insurance program, and the contract terms for all insurance contracts.			
<ul style="list-style-type: none"> • The district's policies require clear and complete contract terms for all insurance contracts. 			
<ul style="list-style-type: none"> • District staff and/or consultant hired by the district analyzes current insurance plans including deductible amounts, co-insurance levels, and types of coverage provided. Said analysis should include data obtained from contiguous and comparable size districts. 			
<ul style="list-style-type: none"> • The district has developed an adequate insurance/self insurance program consisting of liability, property, casualty, employee and public officials bonds, errors and omission, and workers compensation. 			
<ul style="list-style-type: none"> • District policy requires the periodic bidding and evaluating the types and number of companies and benefits offered to employees (tax shelter annuities, etc.) 			
<ul style="list-style-type: none"> • The staff analyzes or employs or engages a consultant to ensure federal requirements and risk management best practices are being complied with by the district with regard to actuarial projections for self-funded healthcare programs, Federal Healthcare requirements, Section 125 IRS requirements, department eligibility audits, etc.. 			
Recommended Risk Management Practices			
11.b. The district effectively links Strategic and Risk Management.			
11.c. The district effectively defines its appetite and tolerance for risk.			
11.d. The district's risk management approach results in silo elimination and increased coordination and accountability			
11.e. The district's workers' compensation program utilizes a managed care component.			
11.f. District staff perform necessary risk analyses to ascertain risks for which the district must be protected and makes recommendations regarding retaining such risks through self insurance, transferring such risks through the purchase of appropriate insurance products, or determine the risks to be too great for either and recommends disbanding the program(s) which is creating the risk issue.			
11.g.. Risk management staff is knowledgeable about insurance plan design and alternative coverage and the district engages a suitable insurance broker and consultant to provide appropriate technical support for determination of needed coverage and financial services in conjunction with seeking competitive proposals through the issues of a Request for Proposal (RFP), Broker Selection, or renewal negotiations for insurance contracts/third party claims administration contracts/Broker selection contracts.			
11.h. The district periodically benchmarks the costs of its insurance coverage against contiguous and comparable size districts and reports the results of such comparisons to the board.			
11.i. The district periodically analyzes the cost-benefits of self-insurance versus fully-insured coverage.			

11.j. Other Risk Management Practices of the Department (Enumerate and document)			
I. PURCHASING STANDARDS	YES	NO	Documentation
12. Mandatory Purchasing Practices			
12.a. The district has established written policies and procedures to take maximum benefit of competitive bidding, volume discounts, and special pricing agreements that include each of the following--			
<ul style="list-style-type: none"> • The district procedures include a repetitive purchasing report to enable the development of term bids to maximize economies of scale. 			
<ul style="list-style-type: none"> • Procurement cards with appropriate dollar, transaction, and merchant controls are used for small dollar purchases. 			
<ul style="list-style-type: none"> • Pcards are utilized to return a rebate on purchased amount where appropriate and advantageous to the district for large volume vendors, 			
<ul style="list-style-type: none"> • Effective quotation procedures are used for purchases above the procurement card threshold, but less than dollar limits for formal bidding. 			
<ul style="list-style-type: none"> • If permitted by state law, the district utilizes state bids, the bids of other school districts or local governments, purchasing consortiums such as US Communities, if advantageous to the district. 			
Recommended Purchasing Practices			
12.b. The district restricts the submission of requisitions to centralized purchasing to those not permitted to be effected by the procurement card or other purchasing delegated authority.			
12.c. The district implements a periodic cost savings report to the Board and senior management reflecting the efforts and value-added impact of the purchasing department			
12.d. The Board has a policy that during the bidding process, a code of silence should exist between the Board, staff, and potential vendors to eliminate the possibility of a bid protest			
12.e. The district maximizes the use of technology to reduce the mailing costs of bids, proposals, and vendor applications on the internet			
12.f. The district has an electronic requisitioning system to ensure budgeted funds are available prior to encumbrances.			
12.g. The district uses an electronic requisition process.			
12.h. The district has implemented an automated procurement process for contract purchases			
12.i. The district has an e-procurement system to leverage strategic sourcing opportunities			
12.j. Other Purchasing Practices of the Department (Enumerate and document)			

SUBCOMMITTEE ON AUDIT

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on Audit

2015-2016

Subcommittee Goal

To review and report on Council budgetary matters, and ensure the proper management of Council revenues.

Chair

Kaya Henderson, District of Columbia Chancellor

Members

Paul Cruz, Austin Superintendent
Michael Hanson, Fresno Superintendent
Jumoke Hinton Hodge, Oakland School Board
Barbara Jenkins, Orange County Superintendent
Felton Williams, Long Beach School Board

Ex Officio

Richard Carranza, San Francisco Superintendent

2014-2015 AUDIT REPORT

INDEPENDENT AUDITOR'S REPORT

FOR

FISCAL YEAR 2014-2015

ENDING JUNE 30, 2015



Financial Statements and Supplemental Information

For the Year Ended June 30, 2015

(With Summarized Financial Information for the Year Ended June 30, 2014)



**and
Report Thereon**



COUNCIL OF THE GREAT CITY SCHOOLS

TABLE OF CONTENTS
For the Year Ended June 30, 2015

	<i>Page</i>
Independent Auditor's Report.....	1-2
Financial Statements	
Statement of Financial Position	3
Statement of Activities	4
Statement of Cash Flows.....	5
Notes to Financial Statements.....	6-14
Supplemental Information	
Supplemental Schedule of Project Revenue and Expenses	15



Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT

To the Board of Directors of the
Council of the Great City Schools

Report on the Financial Statements

We have audited the accompanying financial statements of the Council of the Great City Schools (the Council), which comprise the statement of financial position as of June 30, 2015, and the related statements of activities and cash flows for the year then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Council of the Great City Schools as of June 30, 2015, and the changes in its net assets and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Continued

Other Matters

Report on Summarized Comparative Information

We have previously audited the Council's 2014 financial statements, and we expressed an unmodified audit opinion on those audited financial statements in our report dated January 29, 2015. In our opinion, the summarized comparative information presented herein as of and for the year ended June 30, 2014, is consistent, in all material respects, with the audited financial statements from which it has been derived.

Report on Supplemental Information

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The supplemental schedule of project revenue and expenses on page 15 is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

Raffa, P.C.

Raffa, P.C.

Washington, DC
February 11, 2016

COUNCIL OF THE GREAT CITY SCHOOLS
STATEMENT OF FINANCIAL POSITION
June 30, 2015
(With Summarized Financial Information as of June 30, 2014)

	2015	2014
ASSETS		
Cash and cash equivalents	\$ 2,976,020	\$ 4,069,729
Accounts receivable	66,926	60,453
Grants, contributions and contracts receivable, net	400,061	1,102,435
Prepaid expenses	150,633	137,919
Investments	6,073,711	5,941,375
457(b) and 457(f) plan assets	412,598	354,253
Furniture and equipment, net	20,164	24,531
Deposits	26,944	26,944
TOTAL ASSETS	\$ 10,127,057	\$ 11,717,639
LIABILITIES AND NET ASSETS		
Liabilities		
Accounts payable	\$ 241,083	\$ 374,341
Accrued expenses	152,211	114,472
Deferred compensation plan liability	412,598	354,253
Deferred membership dues	451,693	426,593
Deferred sponsorships and other	173,345	87,970
Deferred rent liability	-	18,559
TOTAL LIABILITIES	1,430,930	1,376,188
Net assets		
Unrestricted	6,930,560	6,004,158
Temporarily restricted	1,765,567	4,337,293
TOTAL NET ASSETS	8,696,127	10,341,451
TOTAL LIABILITIES AND NET ASSETS	\$ 10,127,057	\$ 11,717,639

The accompanying notes are an integral part of these financial statements.

COUNCIL OF THE GREAT CITY SCHOOLS

STATEMENT OF ACTIVITIES

For the Year Ended June 30, 2015

(With Summarized Financial Information for the Year Ended June 30, 2014)

	<u>Unrestricted</u>	<u>Temporarily Restricted</u>	<u>2015 Total</u>	<u>2014 Total</u>
REVENUE AND SUPPORT				
Grants and contracts	\$ 224,242	\$ 593,303	\$ 817,545	\$ 4,125,125
Membership dues	2,740,360	-	2,740,360	2,524,579
Sponsorships	1,200,100	25,000	1,225,100	1,057,000
Registration fees	515,925	-	515,925	444,171
Interest and dividends	479,849	6,000	485,849	229,638
Royalties and other income	50,643	-	50,643	46,958
Net assets released from restriction:				
Satisfaction of program restrictions	<u>3,196,029</u>	<u>(3,196,029)</u>	<u>-</u>	<u>-</u>
TOTAL REVENUE AND SUPPORT	<u>8,407,148</u>	<u>(2,571,726)</u>	<u>5,835,422</u>	<u>8,427,471</u>
EXPENSES				
Program services	6,255,010	-	6,255,010	5,150,422
Management and general	852,122	-	852,122	1,114,175
Fundraising	<u>21,681</u>	<u>-</u>	<u>21,681</u>	<u>45,075</u>
TOTAL EXPENSES	<u>7,128,813</u>	<u>-</u>	<u>7,128,813</u>	<u>6,309,672</u>
Change in net assets before net gains (losses) on investments	1,278,335	(2,571,726)	(1,293,391)	2,117,799
Net gains (losses) on investments	<u>(351,933)</u>	<u>-</u>	<u>(351,933)</u>	<u>458,418</u>
CHANGE IN NET ASSETS	926,402	(2,571,726)	(1,645,324)	2,576,217
NET ASSETS, BEGINNING OF YEAR	<u>6,004,158</u>	<u>4,337,293</u>	<u>10,341,451</u>	<u>7,765,234</u>
NET ASSETS, END OF YEAR	<u>\$ 6,930,560</u>	<u>\$ 1,765,567</u>	<u>\$ 8,696,127</u>	<u>\$ 10,341,451</u>

The accompanying notes are an integral part of these financial statements.

COUNCIL OF THE GREAT CITY SCHOOLS

STATEMENT OF CASH FLOWS

For the Year Ended June 30, 2015

(With Summarized Financial Information for the Year Ended June 30, 2014)

Increase (Decrease) in Cash and Cash Equivalents

	2015	2014
CASH FLOWS FROM OPERATING ACTIVITIES		
Change in net assets	\$ (1,645,324)	\$ 2,576,217
Adjustments to reconcile change in net assets to net cash provided by (used in) operating activities:		
Depreciation	6,763	7,793
Realized gains on sales of investments	(60,291)	(2,701)
Unrealized losses (gains) on investments	412,224	(455,717)
Change in provision for doubtful accounts	2,000	50,000
Changes in assets and liabilities:		
Accounts receivable	(6,473)	(11,200)
Grants, contributions and contracts receivable	700,374	622,497
Prepaid expenses	(12,714)	(76,646)
Deposits	-	(4,169)
Accounts payable	(133,258)	107,845
Accrued expenses	37,739	(29,290)
Deferred membership dues	25,100	4,727
Deferred sponsorships and other	85,375	(38,070)
Deferred rent liability	(18,559)	(16,487)
NET CASH PROVIDED BY (USED IN) OPERATING ACTIVITIES	(607,044)	2,734,799
CASH FLOWS FROM INVESTING ACTIVITIES		
Purchases of furniture and equipment	(2,396)	(6,530)
Purchases of investments	(1,196,266)	(1,980,805)
Proceeds from sales of investments	711,997	252,127
NET CASH USED IN INVESTING ACTIVITIES	(486,665)	(1,735,208)
NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS	(1,093,709)	999,591
CASH AND CASH EQUIVALENTS, BEGINNING OF YEAR	4,069,729	3,070,138
CASH AND CASH EQUIVALENTS, END OF YEAR	\$ 2,976,020	\$ 4,069,729

The accompanying notes are an integral part of these financial statements.

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS For the Year Ended June 30, 2015

1. Organization and Summary of Significant Accounting Policies

Organization

The Council of the Great City Schools (the Council) is a coalition of 67 of the nation's largest urban public school systems. Founded in 1956 and incorporated in 1961, the Council is located in Washington, DC, where it works to promote urban education through legislation, research, media relations, instruction, management, technology and other special projects designed to improve the quality of urban education. The Council serves as the national voice for urban educators, providing ways to share promising practices and address common concerns. These activities are funded primarily through membership dues, grants, contracts and sponsorships.

Cash and Cash Equivalents

The Council considers money market and sweep funds to be cash equivalents.

Accounts Receivable and Grants, Contributions and Contracts Receivable

Accounts receivable and grants, contributions and contracts receivable are stated at net realizable value. Receivables that are past due are individually analyzed for collectibility. When all collection efforts have been exhausted, the account is written off against an allowance account. Management provides an allowance for those receivables it believes to be uncollectible.

Investments

Investments consist of mutual funds, money market funds and investments in the deferred compensation plans. These investments are recorded in the accompanying statement of financial position at fair value based on quoted market prices. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. For disclosure of the inputs used to measure fair value and related valuation techniques, see Note 4. Interest and dividend income is recorded as earned. Unrealized gains or losses are determined by comparison of cost to fair value at the beginning and end of the reporting period. Realized gains or losses on sales of investments are recorded on the trade date of the transactions. All such gains and losses are included in investment income in the accompanying statement of activities and considered non-operating revenue. Interest and dividends are shown as a separate line item in the accompanying statement of activities and considered to be operating revenue.

Fair Value Measurements

Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) Topic 820, *Fair Value Measurements and Disclosures*, defines fair value, establishes a framework for measuring fair value in accordance with generally accepted accounting principles in the United States of America (GAAP) and requires disclosures about fair value measurements for assets and liabilities measured at fair value on a recurring basis. The ASC emphasizes that fair value is a market-based measurement, not an entity-specific measurement, and therefore, a fair value measurement should be determined based on the assumptions that market participants would use in pricing the asset or liability. As a basis for considering market participant assumptions in fair value measurements, the ASC established a fair value hierarchy based upon the transparency of the inputs to the valuation of an asset or liability. These inputs may be observable, whereby

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS

For the Year Ended June 30, 2015

1. Organization and Summary of Significant Accounting Policies (continued)

Fair Value Measurements (continued)

market participant assumptions are developed based on market data obtained from independent sources, and unobservable, whereby assumptions about market participant assumptions are developed by the reporting entity based on the best information available in the circumstances.

The three levels of the fair value hierarchy are described as follows:

Level 1 – Inputs based on quoted prices (unadjusted) in active markets for identical assets or liabilities accessible at the measurement date.

Level 2 – Inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly or indirectly, such as quoted prices for similar assets or liabilities in active markets.

Level 3 – Unobservable inputs for the asset or liability, including the reporting entity's own assumptions in determining the fair value measurement.

As of June 30, 2015, the Council's assets that are measured at fair value on a recurring basis are described in Note 4 of these financial statements.

Furniture and Equipment and Accumulated Depreciation

Furniture and equipment are stated at cost and are depreciated using the straight-line method over estimated useful lives of three to seven years, with no salvage value. The cost of furniture and equipment retired or disposed of is removed from the accounts along with the related accumulated depreciation, and any gain or loss is reflected in income or expense in the accompanying statement of activities. Expenditures for major repairs and improvements are capitalized; expenditures for minor repairs and maintenance costs are expensed when incurred.

Classification of Net Assets

The net assets of the Council are reported as follows:

- Unrestricted net assets represent the portion of expendable funds that are available for support of the Council's operations.
- Temporarily restricted net assets represent funds that are restricted by donors for specific programs or use in future periods.

Revenue Recognition

The Council reports cash and other assets received as restricted support if they are received with donor stipulations that limit the use of the donated assets. When a donor-imposed restriction expires, that is, when a stipulated time restriction ends or purpose restriction is accomplished, temporarily restricted net assets are reclassified to unrestricted net assets and reported in the accompanying statement of activities as net assets released from restrictions.

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS
For the Year Ended June 30, 2015

1. Organization and Summary of Significant Accounting Policies (continued)

Revenue Recognition (continued)

Unrestricted grants are reported as revenue in the year in which payments are received and/or unconditional promises are made. Revenue recognized on grants that have been committed to the Council, but have not been received, is reflected as part of grants, contributions and contracts receivable in the accompanying statement of financial position.

Contract revenue is recognized as costs are incurred on the basis of direct costs plus allowable indirect expenses at a provisional rate. Revenue recognized on contracts for which billings have not been presented to or collected from the awarding agency is included in grants, contributions and contracts receivable in the accompanying statement of financial position.

Membership dues are recognized in the year to which the membership dues relate. Membership dues paid in advance of the membership period are reported as deferred membership dues in the accompanying statement of financial position.

Sponsorship and registration fees received for conferences and meetings are deferred upon receipt and are recognized as revenue in the year in which the conferences or meetings are held.

Functional Allocation of Expenses

The costs of providing various programs and other activities have been summarized on a functional basis in the accompanying statement of activities. Accordingly, certain costs have been allocated among the programs and supporting services benefited based on direct costs.

Estimates

The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

2. Grants, Contributions and Contracts Receivable

As of June 30, 2015, grants, contributions and contracts receivable consist of unconditional promises to give, sponsorships for conferences that have already taken place and work conducted by the Council under the strategic support teams initiative. All amounts are due to be collected within one year. The Council has established an allowance for doubtful accounts of \$102,000. Grants, contributions and contracts receivable consists of the following:

Grants receivable	\$	16,498
Strategic support teams		163,842
Sponsorships receivable		253,000
Other receivables		<u>68,721</u>
Total	\$	502,061
Less: Allowance for Doubtful Account		<u>(102,000)</u>
Grants, Contributions and Contracts Receivable, Net	\$	<u>400,061</u>

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

**NOTES TO FINANCIAL STATEMENTS
For the Year Ended June 30, 2015**

3. Investments

Investments, at fair value, consisted of the following as of June 30, 2015:

Equity mutual funds	\$ 3,529,897
Bond mutual funds	2,499,022
Money market funds	<u>44,792</u>
Total Investments	<u>\$ 6,073,711</u>

Investment returns are summarized as follows for the year ended June 30, 2015:

Interest and dividends	\$ 485,849
Realized gains	60,291
Unrealized losses	<u>(412,224)</u>
Total Investment Returns	<u>\$ 133,916</u>

For the year ended June 30, 2015, investment fees incurred were \$48,099 and are included in management and general in the accompanying statement of activities.

4. Fair Value Measurements

The following table summarizes the Council's investments measured at fair value on a recurring basis as of June 30, 2015, aggregated by the fair value hierarchy level within which those measurements were made:

	Total Fair Value	Quoted Prices in Active Markets for Identical Assets/ Liabilities (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Assets:				
Investments:				
Mutual funds:				
Equity funds:				
Large growth	\$ 875,577	\$ 875,577	\$ -	\$ -
Moderate allocation	502,690	502,690	-	-
Large value	456,291	456,291	-	-
Foreign large value	397,445	397,445	-	-
Diversified emerging markets	329,361	329,361	-	-
Small cap growth	298,895	298,895	-	-
Small value	189,919	189,919	-	-
Mid cap growth	144,099	144,099	-	-
Mid cap value	132,675	132,675	-	-

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS
For the Year Ended June 30, 2015

4. Fair Value Measurements (continued)

<i>(Continued)</i>	<u>Total Fair Value</u>	<u>Quoted Prices in Active Markets for Identical Assets/ Liabilities (Level 1)</u>	<u>Significant Other Observable Inputs (Level 2)</u>	<u>Significant Unobservable Inputs (Level 3)</u>
Assets:				
Investments:				
Mutual funds:				
Equity funds:				
Commodity broad basket	\$ 112,878	\$ 112,878	\$ -	\$ -
Real estate	<u>90,067</u>	<u>90,067</u>	<u>-</u>	<u>-</u>
Total Equity Funds	<u>3,529,897</u>	<u>3,529,897</u>	<u>-</u>	<u>-</u>
Bond funds:				
World bond	1,315,636	1,315,636	-	-
Intermediate term	949,599	949,599	-	-
Nontraditional	131,673	131,673	-	-
High yield	90,602	90,602	-	-
Intermediate government	<u>11,512</u>	<u>11,512</u>	<u>-</u>	<u>-</u>
Total Bond Funds	<u>2,499,022</u>	<u>2,499,022</u>	<u>-</u>	<u>-</u>
Money market funds	<u>44,792</u>	<u>44,792</u>	<u>-</u>	<u>-</u>
Subtotal	<u>6,073,711</u>	<u>6,073,711</u>	<u>-</u>	<u>-</u>
457(b) and 457(f) plan assets:				
457(b) plan assets:				
Cash surrender value of life insurance policy	183,603	-	183,603	-
Fixed income	24,488	-	24,488	-
Exchange-traded funds	120,957	120,957	-	-
Mutual funds	1,473	1,473	-	-
457(f) plan assets:				
Exchange-traded funds	71,458	71,458	-	-
Mutual funds	<u>7,913</u>	<u>7,913</u>	<u>-</u>	<u>-</u>
Subtotal 457(b) and 457(f) Plan Assets	<u>409,892</u>	<u>201,801</u>	<u>208,091</u>	<u>-</u>
Total Investments and 457(b) and 457(f) Plan Assets, Measured at Fair Value	6,483,603	<u>\$ 6,275,512</u>	<u>\$ 208,091</u>	<u>\$ -</u>
Interest-bearing cash deposits	<u>2,706</u>			
Total Investments and 457(b) and 457(f) Plan Assets	<u>\$ 6,486,309</u>			

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS
For the Year Ended June 30, 2015

4. Fair Value Measurements (continued)

The Council used the following methods and significant assumptions to estimate fair value for assets recorded at fair value:

Mutual funds and exchange-traded funds – Valued at quoted market prices for identical assets in active markets.

Cash surrender value of life insurance policies – Cash surrender value of life insurance policies is based upon the reserve value, which is the face amount of the contracts discounted at a specific rate of interest according to the insured's life expectancy.

Money market funds – Valued at the net asset value of shares held, as reported in the active market in which the individual security or fund is traded.

Fixed income – Represents securities that are generally not traded on a daily basis. The fair value estimates of such investments are based on observable market information, rather than on market quotes. Accordingly, the estimates of fair value for such investments, as provided by the pricing service, are included in Level 2.

5. Furniture and Equipment and Accumulated Depreciation

The Council held the following furniture and equipment as of June 30, 2015:

Furniture and equipment	\$ 459,548
Less: Accumulated Depreciation	<u>(439,384)</u>
Furniture and Equipment, Net	<u>\$ 20,164</u>

Depreciation expense was \$6,763 for the year ended June 30, 2015.

6. Temporarily Restricted Net Assets

As of June 30, 2015, temporarily restricted net assets are available for the following projects which are part of the categorical grants program:

Gates Foundation Project	\$ 1,606,533
Wallace Foundation Project	132,536
University of Chicago Project	<u>26,498</u>
Total	<u>\$ 1,765,567</u>

7. Commitments and Contingencies

Operating Lease

The Council leases office space under a noncancelable operating lease which expired on July 14, 2015. The lease calls for monthly payments of \$20,782 in the first year and \$22,212 in the second year, with annual increases thereafter equal to 2.5% of the previous year's payment for the remainder of the lease. On November 5, 2014, the Council entered into an amended agreement

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS
For the Year Ended June 30, 2015

7. Commitments and Contingencies (continued)

Operating Lease (continued)

to extend the lease through June 30, 2016, for a monthly payment of \$23,875. The Council is also required to pay its pro rata share of increases in real estate taxes and operating expenses. Under GAAP, all fixed rent increases are recognized on a straight-line basis over the term of the lease.

As of June 30, 2015, the Council is scheduled to make future minimum lease payments of \$280,844 during the year ending June 30, 2016. Rent expense totaled \$288,682 for the year ended June 30, 2015.

Concentration of Cash

The Council maintains its cash and cash equivalents with certain commercial financial institutions, which aggregate balance, at times, may exceed the Federal Deposit Insurance Corporation (FDIC) insured limit of \$250,000 per depositor per institution. As of June 30, 2015, the Council had approximately \$3,015,000 composed of demand deposits, which exceeded the maximum limit insured by the FDIC by approximately \$2,289,000. The Council monitors the creditworthiness of these institutions and has not experienced any credit losses on its cash and cash equivalents.

Employment Agreement

The Council entered into an employment agreement with its Executive Director that expires in June 2018. Under the terms of the agreement, the Council is to pay the Executive Director amounts for compensation, benefits and allowances, unless the Council terminates the agreement for cause. If the Council terminates the agreement for reasons other than cause, the Executive Director is entitled to receive severance pay equal to six months of his then-current annual compensation.

8. Functional Expenses

The costs of providing various programs and other activities have been allocated among the programs based on direct costs and an allocated portion of shared costs. The Council's program service expenses were as follows for the year ended June 30, 2015:

Categorical Grants	\$ 3,171,029
Meetings and Conferences	1,433,099
Legislative Advocacy	507,584
Public Advocacy	451,251
Strategic Support Teams	271,515
Member Services	129,960
KPI and Common Core Project In-Kind	91,686
Policy Research	78,755
Urban Deans	30,009
Curriculum and Instruction	28,794
Exxon Mobil Bernard Harris Scholarship	25,000
KPI Business Plan	19,057
Special Projects Account	17,134
Shirley Schwartz Urban Impact Award	137
Total Program Services	<u>\$ 6,255,010</u>

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS For the Year Ended June 30, 2015

9. Pension Plans

The Council sponsors a defined contribution pension plan, which is available to all full-time employees who have completed one year of service. The Council contributes 5% of each eligible employee's gross salary into the plan annually. For the year ended June 30, 2015, pension expense totaled approximately \$131,131.

In addition, the Council offers its Executive Director an opportunity to defer his compensation pursuant to Sections 457(b) and 457(f) of the Internal Revenue Code (the IRC). The funds are funded by voluntary employee salary deferrals in accordance with regulations established under Sections 457(b) and 457(f) of the IRC. As of June 30, 2015, the 457(b) plan had assets of \$332,494 and the 457(f) plan had assets of \$80,104, which represent the cumulative amount of contributions to the plans and accumulated earnings and losses since inception.

10. Income Taxes

The Council is exempt from the payment of taxes on income other than net unrelated business income under Section 501(c)(3) of the IRC. No provision for income taxes is required for the year ended June 30, 2015, as the Council had no net unrelated business income.

The Council follows the authoritative guidance relating to accounting for uncertainty in income taxes included in ASC Topic 740, *Income Taxes*. These provisions provide consistent guidance for the accounting for uncertainty in income taxes recognized in an entity's financial statements and prescribe a threshold of "more likely than not" for recognition and derecognition of tax positions taken or expected to be taken in a tax return. The Council performed an evaluation of uncertain tax positions for the year ended June 30, 2015, and determined that there were no matters that would require recognition in the financial statements or that may have any effect on its tax-exempt status. As of June 30, 2015, the statute of limitations for tax years ended June 30, 2012, through June 30, 2014, remains open with the U.S. federal jurisdiction or the various states and local jurisdictions in which the Council files tax returns. It is the Council's policy to recognize interest and/or penalties related to uncertain tax positions, if any, in income tax expense. As of June 30, 2015, the Council had no accruals for interest and/or penalties.

11. Summarized Financial Information

The financial statements include certain prior year summarized comparative information in total but not by net asset class and functional area. Such information does not include sufficient detail to constitute a presentation in conformity with GAAP. Accordingly, such information should be read in conjunction with the Council's financial statements for the year ended June 30, 2014, from which the summarized information was derived.

12. Subsequent Events

In preparing these financial statements, the Council has evaluated events and transactions for potential recognition or disclosure through February 11, 2016, the date the financial statements were available to be issued. Except for the subsequent event disclosed below, there were no other subsequent events that require recognition or disclosure in the financial statements.

Continued

COUNCIL OF THE GREAT CITY SCHOOLS

NOTES TO FINANCIAL STATEMENTS
For the Year Ended June 30, 2015

12. Subsequent Events (continued)

On December 21, 2015, the Council entered into a non-cancelable operating lease for a new office space for its headquarters in Washington, DC. The lease term is for the period July 1, 2016 through June 30, 2027. The lease provides for 12 months of rent abatement. In addition, the lease calls for a monthly base rent of \$29,717 and contains a fixed escalation clause for increases in the annual minimum rent. Additionally, under the terms of the lease, the Council received an allowance of \$721,491 for building improvements as an incentive to enter into the lease agreement.

SUPPLEMENTAL INFORMATION

COUNCIL OF THE GREAT CITY SCHOOLS
SUPPLEMENTAL SCHEDULE OF PROJECT REVENUE AND EXPENSES
For the Year Ended June 30, 2015

	Meetings and Conferences	Exxon Mobil Bernard Harris Scholarship	Strategic Support Teams	Special Projects Account	Southern Education Foundation Project	Hewlett Foundation Project	KPI Business Plan	Helmley Foundation Grant	Urban Deans	Shirley Schwartz Urban Impact Award	Gates Foundation Project	KPI and Core Project In-Kind	University of Chicago Grant	Wallace Foundation Project	Total
REVENUE AND SUPPORT															
Sponsorships	\$ 1,154,500	\$ 25,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 600	\$ -	\$ -	\$ -	\$ -	\$ 1,180,100
Grants and contracts	-	-	224,242	-	17,000	-	-	-	-	-	299,805	-	26,498	250,000	817,545
Registration fees	515,925	-	-	-	-	-	-	-	-	-	-	-	-	-	515,925
Royalties and other income	-	-	-	-	-	-	50,243	-	-	-	6,000	-	-	-	56,243
Membership dues	-	-	-	-	-	-	-	-	10,000	-	-	-	-	-	10,000
TOTAL REVENUE AND SUPPORT	1,670,425	25,000	224,242	-	17,000	-	50,243	-	10,000	600	305,805	-	26,498	250,000	2,579,813
EXPENSES															
Outside services	193,755	20,000	134,655	200	26,445	106,374	19,057	73,187	4,961	-	1,016,643	-	-	83,648	1,678,925
Salaries and fringe benefits	131,799	-	-	-	22,163	146,149	-	58,879	22,928	-	775,874	91,686	-	230,320	1,479,798
Travel and meeting expenses	942,405	462	32,171	16,934	12,313	6,977	-	14,296	1,711	-	96,692	-	-	45,036	1,168,997
Expenses allocated to projects	100,000	4,538	104,689	-	6,078	64,900	-	13,491	-	-	287,235	-	-	54,330	635,261
Copying and printing	46,927	-	-	-	-	-	-	-	-	137	18,185	-	-	3,126	68,375
Postage and shipping	15,679	-	-	-	-	-	-	-	272	-	1,214	-	-	-	17,165
Telephone	2,534	-	-	-	1	32	-	107	137	-	2,165	-	-	1,004	5,980
General supplies	-	-	-	-	-	-	-	-	-	-	378	-	-	-	378
Dues, subscriptions and publications	-	-	-	-	-	-	-	40	-	-	3,747	-	-	-	3,787
TOTAL EXPENSES	1,433,099	25,000	271,515	17,134	67,000	324,432	19,057	160,000	30,009	137	2,202,133	91,686	-	417,464	5,058,666
CHANGE IN NET ASSETS	237,326	-	(47,273)	(17,134)	(50,000)	(324,432)	31,186	(160,000)	(20,009)	463	(1,896,328)	(91,686)	26,498	(167,464)	(2,478,853)
Excess Cost (Revenue) Transferred to Completed Programs	(300,000)	-	-	-	-	-	-	-	-	-	-	91,686	-	-	(208,314)
PROJECT BALANCES, BEGINNING OF YEAR	687,723	-	34,834	203,131	50,000	324,432	(35,638)	160,000	18,144	19,926	3,502,861	-	-	300,000	5,265,413
PROJECT BALANCES, END OF YEAR	\$ 625,049	\$ -	\$ (12,439)	\$ 185,997	\$ -	\$ -	\$ (4,452)	\$ -	\$ (1,865)	\$ 20,389	\$ 1,606,533	\$ -	\$ 26,498	\$ 132,536	\$ 2,578,246



February 11, 2016

To the Audit Committee of the
Council of the Great City Schools

Professional standards require us to advise those charged with governance of the following matters relating to our recently completed audit of the Council of the Great City Schools (the Council) as of and for the year ended June 30, 2015. The matters discussed herein are those that we have noted as of February 11, 2016, and we have not updated our procedures regarding these matters since that date. This letter is solely for the internal use of the Audit Committee, the Board of Directors, and management and is not intended to be and should not be used by anyone other than these specified parties.

ITEMS TO BE COMMUNICATED

AUDITOR'S RESPONSE

The Auditor's Responsibility under Auditing Standards Generally Accepted in the United States of America. The auditor is responsible for obtaining reasonable assurance about whether the financial statements that have been prepared by management with the oversight of those charged with governance are free of material misstatements, whether caused by error or fraud. An audit in accordance with generally accepted auditing standards (GAAS) provides reasonable, rather than absolute, assurance or guarantee of the accuracy of the financial statements and is subject to the inherent risk that errors or fraud, if they exist, have not been detected. Such standards also require the auditor to obtain a sufficient understanding of the organization's internal controls to plan the audit for the purpose of determining the auditor's procedures and not to provide any assurance concerning such internal controls.

Communicated in our engagement letter dated June 29, 2015, and our opinion on the financial statements. Our audit of the financial statements does not relieve management or those charged with governance of their responsibilities.

Planned Scope and Timing of the Audit. The auditor should communicate with those charged with governance an overview of the planned scope and timing of the audit.

A discussion was held with the Treasurer/Secretary of the Board of Directors regarding the planned scope and timing of the audit, the intention of which was to assist those charged with governance in understanding better the consequences of our audit work on their oversight responsibilities, along with assisting us in understanding the Council and its environment.

ITEMS TO BE COMMUNICATED

AUDITOR'S RESPONSE

Qualitative Aspects of Significant Accounting Practices. Management is responsible for the selection and use of appropriate accounting policies. The auditor should advise those charged with governance about the appropriateness of accounting policies and their application and disclosures.

The significant accounting policies are described in the notes to the financial statements. The application of significant existing policies was not changed during the year. We have reviewed the accounting policies and disclosures that management has identified to be the most critical and concur with management's assessment. We noted no significant transactions entered into by the Council during the year that were unusual or transactions for which there is a lack of authoritative guidance.

Management Judgments and Accounting Estimates. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ markedly from management's current judgments.

We believe that the Council's allocation of expenses and allowance for doubtful accounts represent particularly sensitive accounting estimates. We have evaluated the key factors and assumptions used to develop these estimates and believe they are reasonable in relation to the financial statements taken as a whole.

Significant Difficulties Encountered. The auditor should inform those charged with governance of any significant difficulties encountered in dealing with management related to the performance of the audit.

We are pleased to inform you that there were no significant difficulties encountered during the course of the audit. All records and information requested by Raffa were freely available for inspection. Management and other personnel provided full cooperation.

Corrected and Uncorrected Misstatements and Financial Statement Disclosures. The auditor is required to accumulate all known and likely misstatements identified during the audit, other than those that we believe are trivial, and to communicate such misstatements to the appropriate level of management. The auditor should also communicate with those charged with governance corrected and uncorrected misstatements and the effect that these misstatements have on the financial statements.

During our audit, no material corrected misstatements were brought to the attention of management by us.

There were also no waived audit adjustments.

ITEMS TO BE COMMUNICATED

AUDITOR'S RESPONSE

Disagreements with Management. The auditor should discuss with those charged with governance any disagreements with management, whether or not satisfactorily resolved, about matters that, individually or in the aggregate, could be significant to the Council's financial statements or the auditor's report.

We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations. The auditor must inform those charged with governance of the representations required from management.

We have requested certain representations from management in the management representation letter. This letter is attached.

Management's Consultation with Other Accountants. When the auditor is aware that management has consulted with other accountants about accounting and auditing matters, the auditor should discuss with those charged with governance his or her views about significant matters that were the subject of such consultation.

We are not aware of any consultations by management with other accountants on the application of generally accepted accounting principles.

Significant Issues Discussed with Management prior to Our Retention. The auditor should communicate with those charged with governance any significant issues that were discussed or were the subject of correspondence with management prior to our retention.

There were no major accounting or other issues of concern discussed with management prior to our being retained as auditor for the 2015 audit.

Independence. GAAS requires independence for all audits. Relevant matters to consider in reaching a conclusion about independence include circumstances or relationships that create threats to auditor independence and the related safeguards that have been applied to eliminate those threats or reduce them to an acceptable level.

We are not aware of any circumstances or relationships that would impair our independence.

Material Alternative Accounting Treatments Discussed with Management. The auditor must inform those charged with governance of discussions with management regarding alternative accounting treatments.

During the past year, there were no discussions with management concerning material alternative accounting treatments.

ITEMS TO BE COMMUNICATED

AUDITOR'S RESPONSE

Other Significant and Relevant Issues Arising from the Audit. The auditor must inform those charged with governance of findings or issues arising from the audit that are, in the auditor's professional judgment, significant and relevant to those charged with governance regarding their oversight of the financial reporting process.

There were no other issues arising from the audit that we consider significant and relevant to those charged with governance.

Internal Control Matters. The auditor must communicate, in writing, to management and those charged with governance all significant deficiencies and material weaknesses identified during the audit.

We did not identify any deficiencies in internal control that we consider to be material weaknesses.



MEMBER DISTRICTS

Albuquerque
Anchorage
Arlington, TX
Atlanta
Austin
Baltimore
Birmingham
Boston
Bridgeport
Broward County
Buffalo
Charleston County
Charlotte-Mecklenburg
Chicago
Cincinnati
Clark County
Cleveland
Columbus
Dallas
Dayton
Denver
Des Moines
Detroit
Duval County
El Paso
Fort Worth
Fresno
Guilford County
Hillsborough County
Honolulu
Houston
Indianapolis
Jackson
Jefferson County, KY
Kansas City
Long Beach
Los Angeles
Miami-Dade County
Milwaukee
Minneapolis
Nashville
New Orleans
New York City
Newark
Norfolk
Oakland
Oklahoma City
Omaha
Orange County, FL
Palm Beach County
Philadelphia
Pittsburgh
Portland
Providence
Richmond
Rochester
Sacramento
San Antonio
San Diego
San Francisco
Santa Ana
Seattle
Shelby County
St. Louis
St. Paul
Toledo
Washington, D.C.
Wichita

Council of the Great City Schools®
1301 Pennsylvania Avenue, NW, Suite 702, Washington, DC 20004
(202) 393-2427 (202) 393-2400 (fax) www.cgcs.org

February 11, 2016

Raffa, PC
1899 L ST NW, Suite 900
Washington, DC 20036

This representation letter is provided in connection with your audit of the financial statements of Council of Great City Schools (the Council), which comprise the statement of financial position as of June 30, 2015, and the related statements of activities and cash flows for the year then ended, and the related notes to the financial statements, for the purpose of expressing an opinion as to whether the financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement. An omission or misstatement that is monetarily small in amount could be considered material as a result of qualitative factors.

We confirm, to the best of our knowledge and belief, as of **February 11, 2016**, the following representations made to you during your audit.

Financial Statements

- 1) We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated June 29, 2015, including our responsibility for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP.
- 2) The financial statements referred to above are fairly presented in conformity with U.S. GAAP.
- 3) We acknowledge our responsibility for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.
- 4) We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.
- 5) Significant assumptions we used in making accounting estimates, including those measured at fair value, are reasonable.
- 6) Related-party relationships and transactions have been appropriately accounted for and disclosed in accordance with U.S. GAAP.
- 7) All events subsequent to the date of the financial statements and for which U.S. GAAP requires adjustment or disclosure have been adjusted or disclosed.
- 8) The effects of all known actual or possible litigation, claims, and assessments have been accounted for and disclosed in accordance with U.S. GAAP.
- 9) Material concentrations have been appropriately disclosed in accordance with U.S. GAAP.

- 10) Guarantees, whether written or oral, under which the Organization is contingently liable, have been properly recorded or disclosed in accordance with U.S. GAAP.

Information Provided

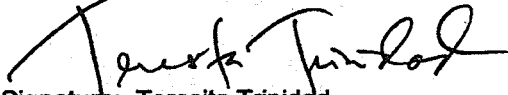
- 11) We have provided you with:
- a) Access to all information, of which we are aware, that is relevant to the preparation and fair presentation of the financial statements, such as records, documentation, and other matters.
 - b) Additional information that you have requested from us for the purpose of the audit.
 - c) Unrestricted access to persons within the Council from whom you determined it necessary to obtain audit evidence.
 - d) Minutes of the meetings of the governing board or summaries of actions of recent meetings for which minutes have not yet been prepared.
- 12) All material transactions have been recorded in the accounting records and are reflected in the financial statements.
- 13) We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- 14) We have no knowledge of any fraud or suspected fraud that affects the Council and involves:
- a) Management,
 - b) Employees who have significant roles in internal control, or
 - c) Others where the fraud could have a material effect on the financial statements.
- 15) We have no knowledge of any allegations of fraud or suspected fraud affecting the Council's financial statements communicated by employees, former employees, grantors, regulators, or others.
- 16) We have no knowledge of any instances of noncompliance or suspected noncompliance with laws and regulations whose effects should be considered when preparing financial statements.
- 17) We have disclosed to you all known actual or possible litigation, claims, and assessment whose effects should be considered when preparing the financial statements.
- 18) We have disclosed to you the identity of the Council's related parties and all the related-party relationships and transactions of which we are aware.
- 19) The Council has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral.
- 20) We are responsible for compliance with the laws, regulations, and provisions of contracts and grant agreements applicable to us.
- 21) The Council of the Great City Schools is an exempt organization under Section 501(c)(3) of the Internal Revenue Code. Any activities of which we are aware that would jeopardize the Council's tax-exempt status, and all activities subject to tax on unrelated business income or excise or other tax, have been disclosed to you. All required filings with tax authorities are up-to-date.

22) We acknowledge our responsibility for presenting the Schedule of Project Revenue and Expenses in accordance with U.S. GAAP, and we believe the Schedule of Project Revenue and Expenses, including its form and content, is fairly presented in accordance with U.S. GAAP. The methods of measurement and presentation of the Schedule of Project Revenue and Expenses have not changed from those used in the prior period, and we have disclosed to you any significant assumptions or interpretations underlying the measurement and presentation of the supplementary information.



Signature: Michael Casserly

Title: Executive Director



Signature: Teresita Trinidad

Title: Director of Finance and Administration

2015-2016 BUDGET

**GENERAL OPERATIONS
BUDGET REPORT**

FOR

SECOND QUARTER ENDING

DECEMBER 31, 2015

COUNCIL OF THE GREAT CITY SCHOOLS
FY 2015-16 Membership Dues

STATUS OF MEMBERSHIP DUES AS OF March 09, 2016

DISTRICT	NOT PAID	PAID	Date Rec'd FY15-16	Date Rec'd FY14-15	Date Rec'd FY13-14	Date Rec'd FY12-13	
1 Albuquerque		\$42,345	8/20/2015	7/21/2014	7/22/2013	6/19/2012 ***	
2 Anchorage		\$37,054	6/8/2015 ***	6/3/2014 ***	7/2/2013	6/14/2012 ***	
3 Arlington		\$42,345	9/8/2015	NEW			
4 Atlanta		\$37,054	8/4/2015	8/11/2014	7/16/2013	6/15/2012 ***	
5 Austin		\$42,345	10/22/2015	3/2/2015	6/11/2013 ***	6/14/2012 ***	
6 Baltimore		\$42,345	8/24/2015	7/23/2014	8/13/2013	7/18/2012	
7 Birmingham		\$37,054	6/10/2015 ***	6/30/2014 ***	5/30/2013 ***	2/27/2013	
8 Boston		\$42,345	7/5/2015	8/11/2014	8/7/2013	8/24/2012	
9 Bridgeport		\$29,938	8/20/2015	6/26/2014 ***	6/17/2013 ***	3/20/2012 ***	
10 Broward County		\$54,696	3/8/2016	9/23/2014	8/2/2013	9/6/2012	
11 Buffalo		\$37,054	9/9/2015	8/18/2014	8/6/2013	10/24/2012	
12 Charleston County		\$37,054		5/7/2015	8/6/2013	3/13/2013	
13 Charlotte-Mecklenburg		\$47,637	6/8/2015 ***	6/13/2014 ***	6/7/2013 ***	6/19/2012 ***	
14 Chicago	\$44,696			2/17/2015	10/4/2013	11/14/2012	
15 Cincinnati		\$37,054	12/7/2015	2/10/2015	10/23/2013	7/12/2012	
16 Clark County		\$54,696	9/17/2015	7/31/2014	2/11/2014	7/24/2012	
17 Cleveland		\$37,054	7/21/2015	6/30/2014 ***	6/17/2013 ***	7/30/2012	
18 Columbus		\$37,054	7/24/2015	8/29/2014	7/22/2013	9/12/2012	
19 Dallas	\$47,637			7/21/2014	7/19/2013	6/19/2012 ***	
20 Dayton		\$37,054	?????	9/18/2014	4/4/2014	8/24/2012	
21 Denver		\$42,345	7/13/2015	8/4/2014	7/22/2013	7/12/2012	
22 Des Moines*		\$29,938	10/27/2015	6/17/2014 ***	7/16/2013	7/18/2012	
23 Detroit	\$37,054			11/21/2014	5/23/2014	1/3/2013	
24 Duval County		\$47,637	8/20/2015	8/4/2014	9/3/2013	8/8/2012	
25 El Paso		\$42,345	8/6/2015	2/17/2015	4/22/2014	not a member	
26 Fort Worth		\$42,345	7/31/2015	2/25/2015	10/7/2013	8/31/2012	
27 Fresno		\$42,345	7/14/2015	9/3/2014	8/27/2013	8/24/2012	
28 Greensboro(Guilford Cty)		\$42,345	11/5/2015	10/3/2014	10/23/2013	8/14/2012	
29 Hawaii		\$47,637	7/6/2015	11/25/2014	new	not a member	
30 Hillsborough County (Tampa)		\$54,696	8/4/2015	7/23/2014	7/22/2013	7/24/2012	
31 Houston		\$54,696	6/5/2015 ***	7/7/2014	7/19/2013	8/14/2012	
32 Indianapolis		\$37,054	1/12/2016	7/7/2014	11/6/2013	7/12/2012	
33 Jackson. MS		\$37,054	2/24/2016	8/11/2014	2/10/2014	did not pay	
34 Jefferson County		\$42,345	8/7/2015	8/4/2014	8/13/2013	8/6/2012	
35 Kansas City, MO		\$37,054	7/28/2015	9/15/2014	3/19/2014	8/31/2012	
36 Long Beach		\$42,345	8/25/2015	8/11/2014	9/10/2013	8/1/2012	
37 Los Angeles		\$54,696	3/2/2016	8/8/2014	3/13/2014	3/15/2013	
38 Miami-Dade County		\$54,696	7/28/2015	8/4/2014	7/22/2013	8/24/2012	
39 Milwaukee		\$42,345	6/3/2015 ***	6/23/2014 ***	7/31/2013	6/19/2012 ***	
40 Minneapolis	\$37,054			9/18/2014	11/6/2013	9/25/2012	
41 Nashville		\$42,345	8/4/2015	7/23/2014	8/1/2013	7/24/2012	
42 New Orleans	\$37,054			did not pay	did not pay	did not pay	
43 New York City		\$54,696	1/19/2016	10/1/2014	2/24/2014	1/18/2013	
44 Newark		\$37,054	3/8/2016	2/6/2015	11/26/2013	12/16/2013	
45 Norfolk		\$37,054	2/17/2016	9/15/2014	4/4/2014	2/27/2013	
46 Oakland		\$37,054	7/28/2015	6/19/2014 ***	7/16/2013	9/17/2012	
47 Oklahoma City		\$37,054	8/20/2015	8/12/2014	did not pay	8/14/2012	
48 Omaha		\$37,054	6/5/2015 ***	6/20/2014 ***	6/25/2013 ***	7/13/2012	
49 Orange County, FL		\$47,637	5/20/2015 ***	6/2/2014 ***	6/4/2013 ***	7/31/2012	
50 Palm Beach County		\$47,637	7/21/2015	2/10/2015	2/18/2014	9/12/2012	
51 Philadelphia		\$47,637	9/17/2015	2/12/2015	10/4/2013	9/28/2012	
52 Pinellas County		\$23,818	3/2/2016				
53 Pittsburgh		\$37,054	6/8/2015 ***	7/11/2014	5/24/2013 ***	6/28/2012 ***	
54 Portland		\$37,054	7/20/2015	6/20/2014 ***	7/11/2013	6/14/2012 ***	
55 Providence*		\$29,938	8/20/2015	1/21/2015	2/18/2014	9/18/2012	
56 Richmond	\$37,054			6/11/2014 ***	3/31/2014	6/15/2012 ***	
57 Rochester		\$37,054	6/16/2015 ***	6/11/2014 ***	6/11/2013 ***	6/14/2012 ***	
58 St. Louis		\$37,054	7/28/2015	8/11/2014	3/27/2014	8/13/2013	
59 St. Paul		\$37,054	6/30/2015 ***	7/3/2014	7/5/2013	6/15/2012 ***	
60 Sacramento		\$37,054	6/3/2015 ***	8/1/2014	10/15/2013	8/8/2012	
61 San Antonio		\$37,054	8/17/2015	NEW			
62 San Diego		\$47,637	8/20/2015	8/1/2014	8/1/2013	3/1/2013	
63 San Francisco		\$42,345	8/20/2015	7/31/2014	8/1/2013	8/17/2012	
64 Santa Ana	\$42,345			8/11/2014	3/4/2014	8/8/2012	
65 Seattle		\$37,054	8/3/2015	7/23/2014	6/4/2013 ***	3/1/2013	
66 Shelby County		\$47,637	9/25/2015	8/1/2014	did not pay	8/24/2012	
67 Toledo		\$37,054	10/22/2015	8/11/2014	7/18/2013	8/14/2012	
68 Tulsa		\$18,527	2/18/2016	not a member			
69 Washington, D.C.		\$37,054	8/4/2015	7/23/2014	7/5/2013	9/27/2012	
70 Wichita		\$37,054	6/16/2015 ***	6/17/2014 ***	6/17/2013 ***	6/19/2012 ***	
Total	\$282,894	\$2,568,814		13	14	11	14

*Largest city in the state
*** Prepaid members

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET
 FOR FY 2015-16

BY FUNCTION

	AUDITED REPORT FY14-15	REVISED BUDGET FY15-16	2ND QTR REPORT FY15-16
GENERAL OPERATING REVENUE			
MEMBERSHIP DUES	\$2,730,360.00	\$2,655,856.00	\$2,124,183.00
GRANTS AND CONTRACTS	0.00	0.00	0.00
SPONSOR CONTRIBUTION	45,000.00	30,000.00	30,000.00
REGISTRATION FEES	0.00	0.00	0.00
INTEREST AND DIVIDENDS	479,849.25	425,000.00	252,139.05
ROYALTIES AND OTHER INCOME	399.22	300.00	0.00
TOTAL REVENUE	\$3,255,608.47	\$3,111,156.00	\$2,406,322.05
GENERAL OPERATING EXPENSES			
ADMIN AND FINANCIAL MANAGEMENT	\$1,133,771.19	\$1,189,387.28	\$632,844.08
EXECUTIVE LEADERSHIP	\$368,561.62	686,505.46	227,228.10
FUNDRAISING ACTIVITIES	\$21,681.05	26,000.00	14,354.27
LEGISLATIVE ADVOCACY	\$507,584.06	542,383.38	248,392.25
CURRICULUM & INSTRUCTION	\$28,793.88	100,000.00	31,824.97
PUBLIC ADVOCACY	\$451,251.11	480,579.43	215,653.52
MEMBER MANAGEMENT SERVICES	\$129,960.33	224,326.16	100,713.20
POLICY RESEARCH	\$78,754.75	572,765.82	127,906.10
ALLOWANCE FOR OFFICE MOVE	\$0.00	315,000.00	3,579.75
INDIRECT EXPENSES FROM PROJECTS	(\$650,210.02)	(710,791.52)	(263,731.94)
TOTAL OPERATING EXPENSES	\$2,070,147.97	\$3,426,156.00	\$1,338,764.29
REVENUE OVER EXPENSES	\$1,185,460.50	(\$315,000.00)	\$1,067,557.76
ADJUSTMENTS:			
OPERATIONS CARRYOVER BALANCE	\$10,341,451.14		
CATEGORICAL PROG NET REVENUE	(\$2,478,852.80)		
NET GAIN/(LOSS) ON INVESTMENT	(\$351,933.27)		
ENDING BALANCE	\$8,696,125.57		

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET
 FOR FY 2015-16

BY EXPENSE LINE

	AUDITED REPORT FY14-15	REVISED BUDGET FY15-16	2ND QTR REPORT FY15-16
GENERAL OPERATING REVENUE			
MEMBERSHIP DUES	\$2,730,360.00	\$2,655,856.00	\$2,124,183.00
GRANTS AND CONTRACTS	0.00	0.00	0.00
SPONSOR CONTRIBUTION	45,000.00	30,000.00	30,000.00
REGISTRATION FEES	0.00	0.00	0.00
INTEREST AND DIVIDENDS	479,849.25	425,000.00	252,139.05
ROYALTIES AND OTHER INCOME	399.22	300.00	0.00
TOTAL REVENUE	<u>\$3,255,608.47</u>	<u>\$3,111,156.00</u>	<u>\$2,406,322.05</u>
GENERAL OPERATING EXPENSES			
SALARIES & FRINGE BENEFITS	\$1,635,569.00	\$2,589,440.52	\$919,637.22
OTHER INSURANCE	20,245.68	21,000.00	12,002.01
TRAVEL & MEETINGS	64,080.18	70,000.00	31,292.39
GENERAL SUPPLIES	18,911.17	30,000.00	11,797.23
SUBSCRIPTION & PUBLICATIONS	16,914.10	20,000.00	10,362.80
COPYING & PRINTING	126,076.34	126,000.00	63,752.21
OUTSIDE SERVICES	390,275.68	496,000.00	310,560.58
TELEPHONE	36,229.23	35,000.00	15,276.10
POSTAGE & SHIPPING	5,671.41	10,000.00	3,210.04
EQPT LEASE MAINT & DEPRECIATION	17,702.95	20,000.00	18,772.66
OFFICE RENT & UTILITIES	288,682.25	304,507.00	152,253.24
ALLOWANCE FOR OFFICE MOVE	0.00	315,000.00	3,579.75
ALLO FOR UNCOLLECTED REVENUE	100,000.00	100,000.00	50,000.00
INDIRECT EXPENSES FROM PROJECTS	(650,210.02)	(710,791.52)	(263,731.94)
TOTAL OPERATING EXPENSES	<u>\$2,070,147.97</u>	<u>\$3,426,156.00</u>	<u>\$1,338,764.29</u>
REVENUE OVER EXPENSES	<u>\$1,185,460.50</u>	<u>(\$315,000.00)</u>	<u>\$1,067,557.76</u>
ADJUSTMENTS:			
OPERATIONS CARRYOVER BALANCE	\$10,341,451.14		
CATEGORICAL PROG NET REVENUE	(\$2,478,852.80)		
NET (GAIN)/LOSS ON INVESTMENT	<u>(\$351,933.27)</u>		
ENDING BALANCE	<u><u>\$8,696,125.57</u></u>		

(01/11/16)
 (Budget-FY15-16)

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET
 REVISED BUDGET FOR FISCAL YEAR 2015-16

	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	\$483,680.28	\$631,505.46	\$25,000.00	\$388,683.38	\$0.00	\$349,579.43	\$165,226.16	\$545,765.82	\$2,589,440.52
OTHER INSURANCE	21,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21,000.00
TRAVEL & MEETINGS	2,500.00	42,500.00	0.00	10,000.00	0.00	6,000.00	3,000.00	6,000.00	70,000.00
GENERAL SUPPLIES	30,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30,000.00
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	106,500.00	1,000.00	10,000.00	126,000.00
OUTSIDE SERVICES	221,000.00	3,000.00	0.00	120,000.00	100,000.00	\$1,000.00	50,000.00	1,000.00	496,000.00
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	20,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20,000.00
OFFICE RENT & UTILITIES	304,507.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	304,507.00
ALLOWANCE FOR OFFICE MOVE	315,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	315,000.00
ALLO FOR UNCOLLECTED REVENUE	100,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100,000.00
EXPENSES ALLOCATED TO PROJECTS	(710,791.52)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(710,791.52)
TOTAL OPERATING EXPENSES	<u>\$793,595.76</u>	<u>\$686,505.46</u>	<u>\$26,000.00</u>	<u>\$542,383.38</u>	<u>\$100,000.00</u>	<u>\$480,579.43</u>	<u>\$224,326.16</u>	<u>\$572,765.82</u>	<u>\$3,426,156.00</u>
	\$710,791.52								
	\$1,504,387.28								

(01/11/16)
 (2nd Qtr Report.xls)

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET
 FOR FY 2015-16
 EXPENSES FOR QUARTER ENDING DECEMBER 31, 2015

	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)	2ND QUARTER TOTAL (7/1/15-12/31/15)
GENERAL OPERATING EXPENSES									
SALARIES & FRINGE BENEFITS	\$212,910.80	\$156,934.48	\$14,354.27	\$186,695.82	\$0.00	\$166,136.25	\$78,837.36	\$103,768.25	\$919,637.22
OTHER INSURANCE	12,002.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12,002.01
TRAVEL & MEETINGS	\$3,031.48	14,262.08	0.00	645.22	0.00	2,959.05	10,000.00	394.56	31,292.39
GENERAL SUPPLIES	11,797.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11,797.23
SUBSCRIPTION & PUBLICATIONS	607.00	0.00	0.00	4,145.74	0.00	3,141.06	0.00	2,469.00	10,362.80
COPYING & PRINTING	8,861.23	0.00	0.00	0.00	0.00	39,163.36	10,946.62	4,781.00	63,752.21
OUTSIDE SERVICES	154,218.76	52,702.82	0.00	55,827.24	31,824.97	631.79	0.00	15,355.00	310,560.58
TELEPHONE	7,499.13	2,934.24	0.00	1,078.23	0.00	1,696.99	929.22	1,138.29	15,276.10
POSTAGE & SHIPPING	890.54	394.48	0.00	0.00	0.00	1,925.02	0.00	0.00	3,210.04
EQPT LEASE MAINT & DEP	18,772.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18,772.66
OFFICE RENT & UTILITIES	152,253.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	152,253.24
OFFICE MOVE EXPENSES	3,579.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,579.75
ALLO FOR UNCOLLECTED REVENUE	50,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	50,000.00
INDIRECT EXPENSES FROM PROJECTS	(263,731.94)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(263,731.94)
TOTAL OPERATING EXPENSES	<u>\$372,691.89</u>	<u>\$227,228.10</u>	<u>\$14,354.27</u>	<u>\$248,392.25</u>	<u>\$31,824.97</u>	<u>\$215,653.52</u>	<u>\$100,713.20</u>	<u>\$127,906.10</u>	<u>\$1,338,764.29</u>
	\$263,731.94								
	<u>\$636,423.83</u>								

1/8/2016

INVESTMENT SCHEDULE - FY15-16
ENDING 12/31/15
Balances are from date of purchase

INVESTMENT ACCOUNTS	ENDING BALANCE 12/31/2015	PURCHASES (7/1/15 - 12/31/15)	SOLD (7/1/15 - 12/31/15)	UNREAL GAINS/(LOSS) (7/1/15 - 12/31/15)	REAL GAINS/(LOSS) (7/1/15 - 12/31/15)
Aberdeen FDS Emerging Mkts Fd	\$211,490	\$207,089	\$0	\$4,401	\$0
Amer Cent Fds	\$357,838	\$23,233	-\$29,425	-\$26,030	\$6,698
Deutsche Sec TR Enhanced Comm	\$114,354	\$113,954	\$0	\$401	\$0
Deutsche Sec Tr Glob RE	\$134,513	\$139,344	\$0	-\$4,831	\$0
Dodge&Cox Intl Stock	\$200,802	\$19,868	\$0	-\$38,290	\$0
Dreyfus Emerging Markets FD	\$0	\$45,494	-\$207,089	\$13,201	-\$54,733
Eaton Vance Inc Fd	\$172,060	\$94,544	\$0	-\$13,086	\$0
Eaton Vance Large Cap Val Fd	\$482,312	\$73,095	\$0	-\$47,074	\$0
First Eagle Fds Sogen Overseas	\$175,898	\$6,850	\$0	-\$9,174	\$0
Goldma Sachs TRUST Strat Inc Fd	\$131,926	\$5,905	\$0	-\$5,653	\$0
Goldman Sachs Treas Instr	\$44,792	\$0	\$0	\$0	\$0
Harbor Fund Cap Appr	\$449,937	\$28,788	-\$54,350	-\$44,305	\$26,587
Harris Assoc Invt Tr Oakmk Equity	\$474,977	\$29,101	\$0	-\$56,814	\$0
JANUS Intl FD FL BD	\$0	\$1,534	-\$350,188	\$3,706	-\$3,708
JPMorgan Core Bd FD Selct	\$494,249	\$105,238	\$0	-\$5,134	\$0
Victory Portfolios Munder MIDCAP	\$124,224	\$11,843	-\$7,273	-\$27,414	\$2,969
Nuveen INVT Fds Inc RE Secs*	\$93,399	\$6,852	-\$6,639	\$1,052	\$2,070
PIMCO Fds SER Comm Real	\$0	\$39,053	-\$113,954	\$45,130	-\$83,108
Inv Mgrs Pioneer Oak Ridge Sm Cp	\$203,306	\$42,610	\$0	-\$40,383	\$0
Ridgeworth Fds Mid-cap Val Eqty Pd	\$129,828	\$12,542	\$0	-\$15,388	\$0
Royce Value Plus FD CL	\$0	\$0	-\$97,005	-\$20,132	\$19,320
Victory Portfolios Sm Co Oppty	\$217,914	\$55,030	\$0	-\$27,035	\$0
Virtus Emerging Mkts Opportunites	\$128,888	\$15,812	\$0	-\$13,158	\$0
Alliance GLO Govt Tr A	\$1,328,253	\$35,127	\$0	-\$22,510	\$0
Alliance Interm Bd A	\$115,121	\$2,263	\$0	-\$1,988	\$0
Alliance Interm Bd C	\$91,964	\$1,519	\$0	-\$1,508	\$0
Fidelity	\$11,619	\$163	\$0	-\$56	\$0
TOTAL:	\$5,678,173	\$909,759	-\$865,922	-\$356,471	(\$83,904)

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 PROJECTS
BUDGET REPORT**

FOR

SECOND QUARTER ENDING

DECEMBER 31, 2015

THE COUNCIL OF THE GREAT CITY SCHOOLS
ESTIMATED 1ST QUARTER REVENUE AND EXPENSE REPORT
2ND QTR (7/1/15 - 12/31/15)

CATEGORICAL PROJECTS
PAGE 1 OF 2

	MEETINGS AND CONFERENCES (20)	STRATEGIC SUPPORT TEAMS (21)	BOARD RETREATS (21-A)	SPECIAL PROJECTS ACCOUNT (22)	KPI BUSINESS PLAN (29)	GATES SOLUTIONS TO COMMON CORE (32)	HELMSLEY GRANT (34)	URBAN DEANS NETWK (40)
OPERATING REVENUE								
MEMBER DUES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
SPONSOR CONTRIBUTION	643,850.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GRANTS & CONTRACTS	0.00	99,152.05	0.00	0.00	8,860.00	0.00	1,000,000.00	0.00
INTEREST	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
REGISTRATION FEES	332,860.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SALE OF PUBLICATION	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL REVENUE	\$976,710.00	\$99,152.05	\$0.00	\$0.00	\$8,860.00	\$0.00	\$1,000,000.00	\$0.00
OPERATING EXPENSES								
SALARIES & FRINGE BENEFITS	\$62,043.55	\$0.00	\$0.00	\$0.00	\$0.00	\$172,532.49	\$14,248.87	\$1,403.67
OTHER INSURANCE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TRAVEL AND MEETING EXPENSES	547,307.69	7,056.26	3,953.28	0.00	0.00	6,382.87	10.34	0.00
GENERAL SUPPLIES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DUES, SUBSCR & PUBLICATION	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
COPYING & PRINTING	24,527.06	0.00	0.00	0.00	0.00	998.92	0.00	0.00
OUTSIDE SERVICES	155,231.28	59,136.22	2,822.63	0.00	34,615.43	78,490.40	36,014.48	1,278.59
PARTICIPANT SUPPORT COST	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TELEPHONE	54.33	0.00	0.00	0.00	0.00	94.43	8.19	49.39
POSTAGE & SHIPPING	11,507.55	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
OFFICE RENT & UTILITIES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EXPENSES ALLOCATED TO PROJECTS	120,100.72	20,519.67	2,100.53	0.00	8,653.86	38,774.87	5,028.19	\$409.75
TOTAL PROJECT EXPENSES	\$920,772.18	\$86,712.15	\$8,876.44	\$0.00	\$43,269.29	\$297,273.98	\$55,310.07	\$3,141.40
REVENUE OVER EXPENSES	\$55,937.82	\$12,439.90	(\$8,876.44)	\$0.00	(\$34,409.29)	(\$297,273.98)	\$944,689.93	(\$3,141.40)
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	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CARRYOVER BALANCE 6/30/15	\$625,049.23	(\$12,439.90)	\$0.00	\$185,996.75	(\$4,451.35)	\$1,115,663.96	\$0.00	(\$1,865.06)
ENDING BALANCE 12/31/15	\$680,987.05	\$0.00	(\$8,876.44)	\$185,996.75	(\$38,860.64)	\$818,389.98	\$944,689.93	(\$5,006.46)

THE COUNCIL OF THE GREAT CITY SCHOOLS
1ST QUARTER REVENUE AND EXPENSE REPORT
2ND QTR (7/1/15 - 12/31/15)

CATEGORICAL PROJECTS
PAGE 2 OF 2

	S Schwartz Urban Impact Award (41)	GATES FOUNDATION ELL MATERIALS (47-A)	GATES FOUNDATION KPI GRANT (48)	GATES FOUNDATION KPI GRANT (49)	WALLACE FOUNDATION GRANT (52/53)	WALLACE FOUNDATION GRANT (54/55)	UNIVERSITY OF CHICAGO GRANT (60)	2ND QTR TOTALS (7/1/15-12/31/15)
OPERATING REVENUE								
MEMBER DUES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
SPONSOR CONTRIBUTION	200.00	0.00	0.00	0.00	0.00	0.00	0.00	\$644,050.00
GRANTS & CONTRACTS	0.00	0.00	0.00	1,600,000.00	0.00	850,000.00	0.00	\$3,558,012.05
INTEREST	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
REGISTRATION FEES	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$332,860.00
SALE OF PUBLICATION	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
TOTAL REVENUE	\$200.00	\$0.00	\$0.00	\$1,600,000.00	\$0.00	\$850,000.00	\$0.00	\$4,534,922.05
OPERATING EXPENSES								
SALARIES & FRINGE BENEFITS	\$0.00	\$92,579.30	\$44,808.34	\$2,149.00	\$78,438.66	\$61,909.90	\$2,379.38	\$532,493.16
OTHER INSURANCE	0.00	0.00	\$0.00	\$0.00	0.00	0.00	0.00	\$0.00
TRAVEL AND MEETING EXPENSES	0.00	9,391.19	\$0.00	\$0.00	0.00	926.40	0.00	\$575,028.03
GENERAL SUPPLIES	0.00	33.98	\$0.00	\$0.00	0.00	0.00	0.00	\$33.98
DUES, SUBSCR & PUBLICATION	0.00	342.73	\$73.00	\$0.00	0.00	0.00	0.00	\$415.73
COPYING & PRINTING	0.00	1,419.42	\$0.00	\$0.00	0.00	0.00	0.00	\$26,945.40
OUTSIDE SERVICES	0.00	80,434.81	\$15,858.64	\$0.00	37448.89	\$15,447.31	\$22,481.75	\$539,260.43
PARTICIPANT SUPPORT COST	0.00	0.00	\$0.00	\$0.00	0.00	0.00	0.00	\$0.00
TELEPHONE	0.00	1,033.57	\$0.00	\$0.00	174.16	0.00	0.00	\$1,414.07
POSTAGE & SHIPPING	0.00	889.08	\$0.00	\$0.00	0.00	0.00	0.00	\$12,396.63
EQPT LEASE MAINT & DEP	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
EXPENSES ALLOCATED TO PROJECTS	0.00	27,918.61	9,112.86	324.22	17,409.26	11,742.54	1,636.87	\$263,731.94
TOTAL PROJECT EXPENSES	\$0.00	\$214,042.69	\$69,852.84	\$2,473.21	\$133,470.97	\$90,026.15	\$26,498.00	\$1,951,719.37
REVENUE OVER EXPENSES	\$200.00	(\$214,042.69)	(\$69,852.84)	\$1,597,526.79	(\$133,470.97)	\$759,973.85	(\$26,498.00)	\$2,583,202.68
CLOSEOUT OF COMPLETED PROJECTS	\$0.00	\$0.00	\$0.00	\$0.00	\$935.06	\$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
CARRYOVER BALANCE 6/30/15	\$20,389.50	\$420,967.96	\$69,852.84	\$0.00	\$132,535.91	\$0.00	\$26,498.00	\$2,578,197.84
ENDING BALANCE 12/31/15	\$20,589.50	\$206,925.27	\$0.00	\$1,597,526.79	\$0.00	\$759,973.85	\$0.00	\$5,161,400.52

PROPOSED BUDGET FOR FY 2016-2017

(12/29/15)

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

	2015-2016 DUES	WITH 0.50% INCREASE 2016-2017 DUES
Largest city in the state TIER I	\$29,938.00	\$30,088.00
Based on enrollment		
TIER II 35,000 TO 54,000	\$37,054.00	\$37,239.00
TIER III 54,001 TO 99,000	\$42,345.00	\$42,557.00
TIER IV 99,001 TO 200,000	\$47,637.00	\$47,875.00
TIER V 200,001 PLUS	\$54,696.00	\$54,969.00

(03/07/16)

COUNCIL OF THE GREAT CITY SCHOOLS
FY 2016-17 Membership Dues

District	2014-15 Dues	2015-16 Dues	0.50% increase 2016-17 Dues
1 Albuquerque	\$41,793	\$42,345	\$42,557
2 Anchorage	\$36,571	\$37,054	\$37,239
3 Arlington	NEW	\$42,345	\$42,557
4 Atlanta	\$36,571	\$37,054	\$37,239
5 Austin	\$41,793	\$42,345	\$42,557
6 Baltimore	\$41,793	\$42,345	\$42,557
7 Birmingham	\$36,571	\$37,054	\$37,239
8 Boston	\$41,793	\$42,345	\$42,557
9 Bridgeport	\$29,548	\$29,938	\$30,088
10 Broward County	\$53,983	\$54,696	\$54,969
11 Buffalo	\$36,571	\$37,054	\$37,239
12 Charleston County	\$36,571	\$37,054	\$37,239
13 Charlotte-Mecklenburg	\$47,016	\$47,637	\$47,875
14 Chicago	\$53,983	\$44,696	\$54,969
15 Cincinnati	\$36,571	\$37,054	\$37,239
16 Clark County	\$53,983	\$54,696	\$54,969
17 Cleveland	\$36,571	\$37,054	\$37,239
18 Columbus	\$41,793	\$37,054	\$37,239
19 Dallas	\$47,016	\$47,637	\$47,875
20 Dayton	\$36,571	\$37,054	\$37,239
21 Denver	\$41,793	\$42,345	\$42,557
22 Des Moines*	\$29,548	\$29,938	\$30,088
23 Detroit	\$47,016	\$37,054	\$37,239
24 Duval County	\$47,016	\$47,637	\$47,875
25 El Paso	\$41,793	\$42,345	\$42,557
26 Fort Worth	\$41,793	\$42,345	\$42,557
27 Fresno	\$41,793	\$42,345	\$42,557
28 Greensboro (Guilford Cty)	\$41,793	\$42,345	\$42,557
29 Hawaii	\$47,016	\$47,637	\$47,875
30 Hillsborough County	\$47,016	\$54,696	\$54,969
31 Houston	\$53,983	\$54,696	\$54,969
32 Indianapolis	\$36,571	\$37,054	\$37,239
33 Jackson, MS	\$36,571	\$37,054	\$37,239
34 Jefferson County	\$41,793	\$42,345	\$42,557
35 Kansas City, MO	\$36,571	\$37,054	\$37,239
36 Long Beach	\$41,793	\$42,345	\$42,557
37 Los Angeles	\$53,983	\$54,696	\$54,969
38 Miami-Dade County	\$53,983	\$54,696	\$54,969
39 Milwaukee	\$47,016	\$42,345	\$42,557
40 Minneapolis	\$36,571	\$37,054	\$37,239
41 Nashville	\$41,793	\$42,345	\$42,557

42	New Orleans	\$36,571	\$37,054	\$37,239
43	New York City	\$53,983	\$54,696	\$54,969
44	Newark	\$36,571	\$37,054	\$37,239
45	Norfolk	\$36,571	\$37,054	\$37,239
46	Oakland	\$36,571	\$37,054	\$37,239
47	Oklahoma City	\$36,571	\$37,054	\$37,239
48	Omaha	\$36,571	\$37,054	\$37,239
49	Orange County, FL	\$47,016	\$47,637	\$47,875
50	Palm Beach County	\$47,016	\$47,637	\$47,875
51	Philadelphia	\$53,983	\$47,637	\$47,875
52	Pinellas County		\$23,818	\$47,875
53	Pittsburgh	\$36,571	\$37,054	\$37,239
54	Portland	\$36,571	\$37,054	\$37,239
55	Providence*	\$29,548	\$29,938	\$30,088
56	Richmond	\$36,571	\$37,054	\$37,239
57	Rochester	\$36,571	\$37,054	\$37,239
58	Sacramento	\$36,571	\$37,054	\$37,239
59	San Antonio	NEW	\$37,054	\$37,239
60	San Diego	\$47,016	\$47,637	\$47,875
61	San Francisco	\$41,793	\$42,345	\$42,557
62	Santa Ana	\$41,793	\$42,345	\$42,557
63	Seattle	\$36,571	\$37,054	\$37,239
64	Shelby County (Memphis)	\$47,016	\$47,637	\$47,875
65	St. Louis	\$36,571	\$37,054	\$37,239
66	St. Paul	\$36,571	\$37,054	\$37,239
67	Toledo	\$36,571	\$37,054	\$37,239
68	Tulsa		\$18,527	\$37,239
69	Washington, D.C.	\$41,793	\$37,054	\$37,239
70	Wichita	\$36,571	\$37,054	\$37,239
<hr/>				
	Total		\$2,851,708	\$2,918,565

*Largest city in the state

(01/11/16)
 (Budget-Jan 2016)

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET

BY FUNCTION

	AUDITED REPORT FY14-15	REVISED BUDGET FY15-16	PROPOSED BUDGET FY16-17
GENERAL OPERATING REVENUE			
MEMBERSHIP DUES	\$2,730,360.00	\$2,655,856.00	\$2,796,212.00
GRANTS AND CONTRACTS	0.00	0.00	0.00
SPONSOR CONTRIBUTION	45,000.00	30,000.00	35,000.00
REGISTRATION FEES	0.00	0.00	0.00
INTEREST AND DIVIDENDS	479,849.25	425,000.00	425,000.00
ROYALTIES AND OTHER INCOME	399.22	300.00	0.00
TOTAL REVENUE	\$3,255,608.47	\$3,111,156.00	\$3,256,212.00
GENERAL OPERATING EXPENSES			
ADMIN AND FINANCIAL MANAGEMENT	\$1,133,771.19	\$1,189,387.27	\$915,880.46
EXECUTIVE LEADERSHIP	368,561.62	686,505.46	784,290.74
FUNDRAISING ACTIVITIES	21,681.05	26,000.00	26,000.00
LEGISLATIVE ADVOCACY	507,584.06	542,383.38	554,569.83
CURRICULUM & INSTRUCTION	28,793.88	100,000.00	76,000.00
PUBLIC ADVOCACY	451,251.11	480,579.43	507,695.83
MEMBER MANAGEMENT SERVICES	129,960.33	224,326.16	176,631.18
POLICY RESEARCH	78,754.75	572,765.82	638,737.42
ALLOWANCE FOR OFFICE MOVE	0.00	315,000.00	0.00
EXPENSES ALLOCATED TO PROJECTS	(650,210.02)	(710,791.52)	(780,193.44)
TOTAL OPERATING EXPENSES	\$2,070,147.97	\$3,426,156.00	\$2,899,612.00
REVENUE OVER EXPENSES	\$1,185,460.50	(\$315,000.00)	\$356,600.00
ADJUSTMENTS:			
OPERATIONS CARRYOVER BALANCE	\$10,341,451.14	\$8,696,125.57	\$8,381,125.57
CATEGORICAL PROG NET REVENUE	(\$2,478,852.80)		
NET GAIN/(LOSS) ON INVESTMENT	(\$351,933.27)		
ENDING BALANCE	\$8,696,125.57	\$8,381,125.57	\$8,737,725.57

(01/11/16)
 (Budget-Jan 2016)

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET

BY EXPENSE LINE

	AUDITED REPORT FY14-15	REVISED BUDGET FY15-16	PROPOSED BUDGET FY16-17
GENERAL OPERATING REVENUE			
MEMBERSHIP DUES	\$2,730,360.00	\$2,655,856.00	\$2,796,212.00
GRANTS AND CONTRACTS	0.00	0.00	0.00
SPONSOR CONTRIBUTION	45,000.00	30,000.00	35,000.00
REGISTRATION FEES	0.00	0.00	0.00
INTEREST AND DIVIDENDS	479,849.25	425,000.00	425,000.00
ROYALTIES AND OTHER INCOME	399.22	300.00	0.00
TOTAL REVENUE	\$3,255,608.47	\$3,111,156.00	\$3,256,212.00
GENERAL OPERATING EXPENSES			
SALARIES & FRINGE BENEFITS	\$1,635,569.00	\$2,589,440.52	\$2,721,340.44
OTHER INSURANCE	20,245.68	21,000.00	21,000.00
TRAVEL & MEETINGS	64,080.18	70,000.00	70,000.00
GENERAL SUPPLIES	18,911.17	30,000.00	30,000.00
SUBSCRIPTION & PUBLICATIONS	16,914.10	20,000.00	20,000.00
COPYING & PRINTING	126,076.34	126,000.00	126,000.00
OUTSIDE SERVICES	390,275.68	496,000.00	519,100.00
TELEPHONE	36,229.23	35,000.00	25,000.00
POSTAGE & SHIPPING	5,671.41	10,000.00	10,000.00
EQPT LEASE MAINT & DEP	17,702.95	20,000.00	30,000.00
OFFICE RENT & UTILITIES	288,682.25	304,507.00	7,365.00
ALLOWANCE FOR OFFICE MOVE	0.00	315,000.00	0.00
ALLO FOR UNCOLLECTED REVENUE	100,000.00	100,000.00	100,000.00
EXPENSES ALLOCATED TO PROJECTS	(650,210.02)	(710,791.52)	(780,193.44)
TOTAL OPERATING EXPENSES	\$2,070,147.97	\$3,426,156.00	\$2,899,612.00
REVENUE OVER EXPENSES	\$1,185,460.50	(\$315,000.00)	\$356,600.00
ADJUSTMENTS:			
OPERATIONS CARRYOVER BALANCE	\$10,341,451.14	\$8,696,125.57	\$8,381,125.57
CATEGORICAL PROG NET REVENUE	(\$2,478,852.80)		
NET (GAIN)/LOSS ON INVESTMENT	(\$351,933.27)		
ENDING BALANCE	\$8,696,125.57	\$8,381,125.57	\$8,737,725.57

(01/11/16)
 (Budget-Jan 2016)

THE COUNCIL OF THE GREAT CITY SCHOOLS
 GENERAL OPERATING BUDGET
 PROPOSED BUDGET FOR FISCAL YEAR 2016-17

	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	\$496,215.46	\$655,290.74	\$25,000.00	\$404,869.83	\$0.00	\$357,695.83	\$168,531.18	\$613,737.42	\$2,721,340.44
OTHER INSURANCE	21,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21,000.00
TRAVEL & MEETINGS	2,500.00	42,500.00	0.00	10,000.00	0.00	6,000.00	3,000.00	6,000.00	70,000.00
GENERAL SUPPLIES	30,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30,000.00
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	106,500.00	1,000.00	10,000.00	126,000.00
OUTSIDE SERVICES	223,100.00	78,000.00	0.00	120,000.00	76,000.00	\$21,000.00	0.00	1,000.00	519,100.00
TELEPHONE	3,500.00	3,000.00	500.00	6,000.00	0.00	4,000.00	4,000.00	4,000.00	25,000.00
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	30,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30,000.00
OFFICE RENT & UTILITIES	7,365.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,365.00
ALLOWANCE FOR OFFICE MOVE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ALLO FOR UNCOLLECTED REVENUE	100,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100,000.00
EXPENSES ALLOCATED TO PROJECTS	(780,193.44)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(780,193.44)
TOTAL OPERATING EXPENSES	<u>\$135,687.02</u>	<u>\$784,290.74</u>	<u>\$26,000.00</u>	<u>\$554,569.83</u>	<u>\$76,000.00</u>	<u>\$507,695.83</u>	<u>\$176,631.18</u>	<u>\$638,737.42</u>	<u>\$2,899,612.00</u>
	\$780,193.44								
	\$915,880.46								

<http://www.bls.gov/cpi/cpid1511.pdf>

Subtract Index for CPI Nov of past year from CPI of Nov of current year
(November data is released 2nd week of December therefore this is used for
budget to be submitted to the Exec Committee in January).

Divide result by the CPI of past year to get the percent change

Percent Change will be used for dues increase of upcoming fiscal year

i.e. 1999 CPI = 168.3
 1998 CPI = 164
 $168.3 - 164 = 4.3 / 164 \times 100 = 2.62\%$

DATA USED:

	CPI	% Increase
Nov-95	153.6	2.60%
Nov-96	158.6	3.26%
Nov-97	161.5	1.83%
Nov-98	164.0	1.55%
Nov-99	168.3	2.62%
Nov-00	174.1	3.45%
Nov-01	177.4	1.90%
Nov-02	181.3	2.20%
Nov-03	184.5	1.77%
Nov-04	191.0	3.52%
Nov-05	197.6	3.46%
Nov-06	201.5	1.97%
Nov-07	210.2	4.31%
Nov-08	212.4	1.07%
Nov-09	216.3	1.84%
Nov-10	218.8	1.14%
Nov-11	226.2	3.39%
Nov-12	230.2	1.76%
Nov-13	233.1	1.24%
Nov-14	236.2	1.32%
Nov-15	237.3	0.50%

Table 24. Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items-Continued

(1982-84=100, unless otherwise noted)

Year	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sep.	Oct.	Nov.	Dec.
1970	37.8	38.0	38.2	38.5	38.6	38.8	39.0	39.0	39.2	39.4	39.6	39.8
1971	39.8	39.9	40.0	40.1	40.3	40.6	40.7	40.8	40.8	40.9	40.9	41.1
1972	41.1	41.3	41.4	41.5	41.6	41.7	41.9	42.0	42.1	42.3	42.4	42.5
1973	42.6	42.9	43.3	43.6	43.9	44.2	44.3	45.1	45.2	45.6	45.9	46.2
1974	46.6	47.2	47.8	48.0	48.6	49.0	49.4	50.0	50.6	51.1	51.5	51.9
1975	52.1	52.5	52.7	52.9	53.2	53.6	54.2	54.3	54.6	54.9	55.3	55.5
1976	55.6	55.8	55.9	56.1	56.5	56.8	57.1	57.4	57.6	57.9	58.0	58.2
1977	58.5	59.1	59.5	60.0	60.3	60.7	61.0	61.2	61.4	61.6	61.9	62.1
1978	62.5	62.9	63.4	63.9	64.5	65.2	65.7	66.0	66.5	67.1	67.4	67.7
1979	68.3	69.1	69.8	70.6	71.5	72.3	73.1	73.8	74.6	75.2	75.9	76.7
1980	77.8	78.9	80.1	81.0	81.8	82.7	82.7	83.3	84.0	84.8	85.5	86.3
1981	87.0	87.9	88.5	89.1	89.8	90.6	91.6	92.3	93.2	93.4	93.7	94.0
1982	94.3	94.6	94.5	94.9	95.8	97.0	97.5	97.7	97.9	98.2	98.0	97.6
1983	97.8	97.9	97.9	98.6	99.2	99.5	99.9	100.2	100.7	101.0	101.2	101.3
1984	101.9	102.4	102.6	103.1	103.4	103.7	104.1	104.5	105.0	105.3	105.3	105.3
1985	105.5	106.0	106.4	106.9	107.3	107.6	107.8	108.0	108.3	108.7	109.0	109.3
1986	109.6	109.3	108.8	108.6	108.9	109.5	109.5	109.7	110.2	110.3	110.4	110.5
1987	111.2	111.6	112.1	112.7	113.1	113.5	113.8	114.4	115.0	115.3	115.4	115.4
1988	115.7	116.0	116.5	117.1	117.5	118.0	118.5	119.0	119.8	120.2	120.3	120.5
1989	121.1	121.6	122.3	123.1	123.8	124.1	124.4	124.6	125.0	125.6	125.9	126.1
1990	127.4	128.0	128.7	128.9	129.2	129.9	130.4	131.6	132.7	133.5	133.8	133.8
1991	134.6	134.8	135.0	135.2	135.6	136.0	136.2	136.6	137.2	137.4	137.8	137.9
1992	138.1	138.6	139.3	139.5	139.7	140.2	140.5	140.9	141.3	141.8	142.0	141.9
1993	142.6	143.1	143.6	144.0	144.2	144.4	144.4	144.8	145.1	145.7	145.8	145.8
1994	146.2	146.7	147.2	147.4	147.5	148.0	148.4	149.0	149.4	149.5	149.7	149.7
1995	150.3	150.9	151.4	151.9	152.2	152.5	152.5	152.9	153.2	153.7	153.6	153.5
1996	154.4	154.9	155.7	156.3	156.6	156.7	157.0	157.3	157.8	158.3	158.6	158.6
1997	159.1	159.6	160.0	160.2	160.1	160.3	160.5	160.8	161.2	161.6	161.5	161.3
1998	161.6	161.9	162.2	162.5	162.8	163.0	163.2	163.4	163.6	164.0	164.0	163.9
1999	164.3	164.5	165.0	166.2	166.2	166.2	166.7	167.1	167.9	168.2	168.3	168.3
2000	168.8	169.8	171.2	171.3	171.5	172.4	172.8	172.8	173.7	174.0	174.1	174.0
2001	175.1	175.8	176.2	176.9	177.7	178.0	177.5	177.5	178.3	177.7	177.4	176.7
2002	177.1	177.8	178.8	179.8	179.8	179.9	180.1	180.7	181.0	181.3	181.3	180.9
2003	181.7	183.1	184.2	183.8	183.5	183.7	183.9	184.6	185.2	185.0	184.5	184.3
2004	185.2	186.2	187.4	188.0	189.1	189.7	189.4	189.5	189.9	190.9	191.0	190.3
2005	190.7	191.8	193.3	194.6	194.4	194.5	195.4	196.4	198.8	199.2	197.6	196.8
2006	198.3	198.7	199.8	201.5	202.5	202.9	203.5	203.9	202.9	201.8	201.5	201.8
2007	202.416	203.499	205.352	206.686	207.949	208.352	208.299	207.917	208.490	208.936	210.177	210.036
2008	211.080	211.693	213.528	214.823	216.632	218.815	219.964	219.086	218.783	216.573	212.425	210.228
2009	211.143	212.193	212.709	213.240	213.856	215.693	215.351	215.834	215.969	216.177	216.330	215.949
2010	216.687	216.741	217.631	218.009	218.178	217.965	218.011	218.312	218.439	218.711	218.803	219.179
2011	220.223	221.309	223.467	224.906	225.964	225.722	225.922	226.545	226.889	226.421	226.230	225.672
2012	226.665	227.663	229.392	230.085	229.815	229.478	229.104	230.379	231.407	231.317	230.221	229.601
2013	230.280	232.166	232.773	232.531	232.945	233.504	233.596	233.877	234.149	233.546	233.069	233.049
2014	233.916	234.781	236.293	237.072	237.900	238.343	238.250	237.852	238.031	237.433	236.151	234.812
2015	233.707	234.722	236.119	236.599	237.805	238.638	238.654	238.316	237.945	237.838	237.336	-

See footnotes at end of table.

SUBCOMMITTEE ON BY-LAWS

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on By-Laws

2015-2016

Subcommittee Goal

To define the mission, responsibilities and composition of the Council's structural components within the framework of applicable laws and regulations.

Chair

VACANT

Members

Jose Banda, Sacramento Superintendent
Larry Feldman, Miami-Dade County School Board
Eric Gordon, Cleveland CEO
Michael O'Neill, Boston School Committee
Paula Wright, Duval County School Board

Ex Officio

Richard Carranza, San Francisco Superintendent

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 Mission. 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 Colleges of Education. 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 Task Forces of the Board of Directors. 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 Duties and Responsibilities. 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 Fidelity Bond. 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 Conferences. 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 Time and Place of Meetings. 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 Spring Directors Meeting. 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 Notices of Meetings. 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 Organization. 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 Press Policy. 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 Fiscal Year. The fiscal year of the Corporation shall be from July 1st of each year to June 30th of the succeeding year.

Section 8.02 Audit. 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 Bond. 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 Financial Support. 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 Grants. 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 Disbursements. 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 Amendments. 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 Rules of Order. 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

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
March 19, 2012 Washington, D.C.
March 23, 2014 Washington, D.C.

SUBCOMMITTEE ON MEMBERSHIP

COUNCIL OF THE GREAT CITY SCHOOLS

Subcommittee on Membership

2015-2016

Subcommittee Goal

To review criteria and applications for membership, and recruit and retain members.

Chair

Pam Knowles, Portland School Board

Members

Thomas Ahart, Des Moines Superintendent
JoAnn Brannon, Nashville School Board
Juan Cabrera, El Paso Superintendent
Darien Driver, Milwaukee Superintendent
Airick West, Kansas City School Board

Ex Officio

Richard Carranza, San Francisco Superintendent

TULSA PUBLIC SCHOOLS



T U L S A

PUBLIC SCHOOLS

Deborah A. Gist, Superintendent

"Excellence and High Expectations with a Commitment to All"

December 8, 2015

Mr. Michael Casserly
Council of the Great City Schools
1301 Pennsylvania Avenue, NW Suite 702
Washington, D.C. 20004

RECEIVED

DEC 15 2015

BY: _____

Dear Michael,

I would love to reactivate Tulsa Public Schools' membership with the Council of Great City Schools effective January 1, 2016. The Council of Great City Schools' mission, vision, and goals align with where we are as a school district and how we would like to move forward.

Best,

Deborah A. Gist
Superintendent

PINELLAS COUNTY SCHOOLS



Vision:
100% Student Success

Mission:
"Educate and prepare each student for college, career and life."



ADMINISTRATION BUILDING
301 Fourth St. SW
P.O. Box 2942
Largo, FL 33779-2942
Ph. (727) 588-6000

**SCHOOL BOARD OF
PINELLAS COUNTY, FLORIDA**
Chairperson
Linda S. Lerner

Vice Chairperson
Peggy L. O' Shea

Janet R. Clark
Carol J. Cook
Rene Flowers
Terry Krassner
Dr. Ken Peluso

Superintendent
Michael A. Grego, Ed.D.

October 21, 2015

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

Dear Dr. Casserly:

I am inspired by the work of the Council of the Great City Schools in supporting large urban school districts in improving the education of children in the inner cities. It is my sincere hope that the Council of the Great City Schools will support the Pinellas County School District and its large cities with several of our lowest performing schools. Currently, the District is providing some of the most effective initiatives to improve these schools, but these schools and our entire District would benefit tremendously from membership in the Council of the Great City Schools. I also believe that the results of our current successful initiatives could support similar schools in urban areas struggling with low performance and extreme poverty. Please consider this description of the Pinellas County School District and its challenges and initiatives as a letter of request for membership in the Council of the Great City Schools.

The Pinellas County School District (PCS) is located on the west coast of Florida in the Tampa Bay area along the Gulf of Mexico in the most densely populated county in the state. Pinellas County sustains about 3,347 residents per square mile (next is Broward with 1,444) and has a mix of large and small cities with a total of 24 municipalities with St. Petersburg/Clearwater (population 352,454), and Largo (population 77,648), the largest cities accounting for just under half of the county's total population. These cities are also increasing in population especially with Latino and English Language Learner students. The rest of Pinellas County is divided between the remaining seven cities and an unincorporated area.

PCS operates 16 traditional and 2 alternative high schools (29,830 students), 21 middle schools (19,612 students), 74 Pre-k thru elementary schools (43,435 students), 2 elementary/middle (1,934 students), virtual, exceptional, charter and other schools bringing the Pre-K thru 12th grade enrollment to 103,779. Additionally, PCS has 8 post-secondary adult education programs (22,822 students). PCS is the seventh largest school district of the 67 districts in Florida and the 26th largest in the nation. The student population is 56.6% White, 18.6% Black, 15.8% Hispanic, 4.5% Asian, 4.3% multi-racial and .2% Native American. Our inner city schools, however, have different demographics with significant economically disadvantaged and isolated

Membership- Council of the Great City Schools
Page 2
October 21, 2015


minority populations (Campbell Park: 88% minority; Fairmount Park: 90% minority; Maximo: 91% minority; Melrose: 92% minority; Lakewood: 86% minority). Of the District's 63 Title I schools, St. Petersburg/Clearwater have 36 schools classified as such and directly certified for free meals. Overall, the District has 54% of its students categorized as economically disadvantaged with the fastest growing youth population of children from economically disadvantaged households, households of extreme poverty, and households that are headed by single parents.

As PCS earned systems accreditation in 2015 from the AdvancED Accreditation Commission's Systems Accreditation, our efforts to reduce variation and improve these schools as well as all of our 130 sites has resulted in five strategic goals guiding improvement of academic performance, leadership management, effective instruction of rigorous content, behavior, and community involvement. These primary areas are fully aligned with the vision, mission, and goals of the Council of the Great City Schools and will be mutually beneficial as both organizations support urban education with programs to boost academic performance; narrow achievement gaps; improve professional development; and strengthen leadership, governance, and management.

PCS cities resemble many other Council of the Great City Schools cities. Additionally, our cities collaborate on many areas including athletics, tourism, and business development creating a huge metropolitan area only a "half" bridge or causeway from Tampa and another member district, Hillsborough County Schools. PCS has a long history of working together with our neighboring districts for the benefit of children. Our District would be an asset to the other member districts and is the only one of the large districts in Florida not yet a part of this meaningful coalition dedicated to the improvement of education for children in city schools.

On a personal note, I worked 28 years in the Hillsborough County School District. During that time, I served as Assistant Superintendent of Curriculum and Instruction and as such, attended and presented for several sessions during the Council of the Great City Schools' annual conferences. I have experienced firsthand the benefits of the Council and firmly believe that PCS is a prime candidate to join and that the membership will be mutually beneficial. Thank you for consideration of this request to become a member of the Council of the Great City Schools. I believe that the Council's investment in our students' futures will be repaid many times over in the years ahead.

Sincerely,



Michael A. Grego, Ed.D.
Superintendent
Pinellas County Schools

COUNCIL OF THE GREAT CITY SCHOOLS

Membership by Region

March, 2016

East (E)	Midwest (MW)	Southeast (SE)	West (W)
Boston	Arlington (TX)	Atlanta	Albuquerque
Bridgeport	Austin	Baltimore	Anchorage
Buffalo	Chicago	Birmingham	Fresno
Cincinnati	Dallas	Broward County	Hawaii
Cleveland	Denver	Charleston	Las Vegas
Columbus	Des Moines	Charlotte	Long Beach
Dayton	El Paso	Greensboro	Los Angeles
Detroit	Ft. Worth	Jackson	Oakland
Newark	Houston	Jacksonville	Portland
New York City	Indianapolis	Louisville	Sacramento
Philadelphia	Kansas City	Memphis-Shelby Cty	San Francisco
Pittsburgh	Milwaukee	Miami-Dade County	Seattle
Providence	Minneapolis	Nashville	San Diego
Rochester	Oklahoma City	New Orleans	Santa Ana
Toledo	Omaha	Norfolk	
	San Antonio	Orlando	
	St. Louis	Palm Beach	
	St. Paul	Richmond	
	Tulsa	St. Petersburg	
	Wichita	Tampa	
		Washington D.C.	
15	20	21	14

**DISTRICT APPLICANTS DENIED MEMBERSHIP,
2009-2017**

District Applicants 2009-2015

District	Year	Status
Rockford (IL)	2009	Denied
Socorro (TX)	2009	Denied
Salem (OR)	2009	Denied
Clayton County (GA)	2009	Denied
Durham Public Schools (NC)	2010	Denied
Washoe County	2010	Denied
Pinellas County (FL)	2010	Denied
Michigan Education Achievement Authority	2011	Denied
Durham Public Schools (NC)	2011	Denied
Dekalb County (GA)	2011	Denied
Eugene (OR)		Denied
Knox County (TN)		Denied
Fort Wayne (IN)	2012	Denied
Portland (ME)	2012	Denied
District U-46 (Elgin, IL)	2012	Denied
Newport News (VA)	2012	Denied
Sweetwater Union High School District (CA)	2013	Denied
Grand Rapids (MI)	2014	Denied
Dallas County Intermediate	2014	Denied
Savannah Chatham County	2014	Denied
Jennings (MO)	2014	Denied
Durham Public Schools (NC)	2015	Denied

OFFICE MOVE

Office Lease

NATIONAL PLACE LEASE COMPANY, LLC,

Landlord

and



COUNCIL OF THE GREAT CITY SCHOOLS,

Tenant

December 21st, 2015

Property Address:

**1331 Pennsylvania Avenue, N.W.
Washington, D.C.**

INITIAL HERE	
Landlord 	Tenant 

★ ★ ★ ★ ★ ★ ★ ★

The mailing, delivery or negotiation of this Lease by Landlord or its agent or attorney shall not be deemed an offer by Landlord to enter into this Lease or to enter into any other relationship with Tenant, whether on the terms contained herein or on any other terms. This Lease shall not be binding upon Landlord, and Landlord shall not have any obligations or liabilities nor shall Tenant have any rights with respect thereto, or with respect to the Demised Premises, unless and until Landlord has executed and delivered, and Tenant has received, this Lease. Until such execution and delivery of this Lease, Landlord may terminate all negotiation and discussion of the subject matter hereof, without cause and for any reason, without recourse or liability.

★ ★ ★ ★ ★ ★ ★ ★



INITIAL HERE	
Landlord 	Tenant 

TABLE OF CONTENTS

Section		Page
BASIC LEASE INFORMATION..... vi		
	LANDLORD	VI
	LANDLORD'S ADDRESS FOR NOTICES	VI
	TENANT	VI
	TENANT'S ADDRESS FOR NOTICES	VI
	BUILDING	VI
	LAND	VI
	PROPERTY	VI
	DEMISED PREMISES	VI
	GROSS OFFICE RENTABLE AREA OF THE BUILDING	VI
	GROSS RENTABLE AREA OF THE DEMISED PREMISES	VI
	LEASE COMMENCEMENT DATE	VI
	LEASE EXPIRATION DATE	VI
	TERM.....	VI
	BASE RENT	VI
	ADVANCE RENT.....	VII
	EXPENSE SHARE STOP.....	VII
	BROKER.....	VII
	SECURITY DEPOSIT	VII
	TENANT WORK ALLOWANCE	VII
	BUILDING HOURS	VII
	PARKING SPACES.....	VII
 LEASE		
1.	Demised Premises	1
2.	Term.....	1
3.	Base Rent; Additional Rent.....	2
4.	Real Estate Taxes and Operating Costs.....	4
5.	Use of Demised Premises.....	8
6.	Assignment.....	9
7.	Subletting.....	11
8.	Maintenance by Tenant of the Demised Premises.....	14
9.	Alterations.....	14
10.	Signs; Furnishings.....	16
11.	Inspection.....	16

INITIAL HERE	
Landlord 	Tenant

TABLE OF CONTENTS
continued... ..

Section		Page
12.	Insurance.....	17
13.	Indemnity.....	18
14.	Liability of Landlord.....	18
15.	Tenant's Equipment.....	19
16.	Services and Utilities.....	20
17.	Damage by Fire or Casualty.....	21
18.	Damage Caused By Tenant.....	23
19.	Default of Tenant.....	23
20.	Waiver.....	25
21.	Subordination and Attornment.....	26
22.	Condemnation.....	26
23.	Rules and Regulations.....	27
24.	Covenant of Quiet Enjoyment.....	27
25.	Sale or Transfer.....	27
26.	No Partnership.....	27
27.	No Representations by Landlord.....	27
28.	Brokers.....	27
29.	Notices.....	28
30.	Estoppel Certificates.....	28
31.	Surrender; Holding Over.....	28
32.	Right of Landlord to Cure Tenant's Default.....	29
33.	Lien on Personal Property.....	29
34.	Benefit and Burden.....	29
35.	Security Deposit.....	30
36.	Landlord as an Individual or Partnership.....	32
37.	Financial Statements.....	32



INITIAL HERE	
Landlord	Tenant
	

TABLE OF CONTENTS
continued... ..

Section	TABLE OF CONTENTS continued... ..	Page
38.	Mortgagee Protection.....	32
39.	Energy Conservation and Governmental Policies.....	32
40.	Landlord's Rights to Building Maintenance and Renovations.....	32
41.	Adjacent Excavation, Shoring.....	33
42.	Patriot Act Compliance.....	33
43.	Joint and Several Liability.....	33
44.	Environmental Matters.....	33
45.	Common Facilities.....	34
46.	Mechanic's Liens.....	34
47.	Covenants Running With the Land.....	34
48.	Parking.....	35
49.	Miscellaneous.....	35

TABLE OF EXHIBITS AND RIDERS

EXHIBIT A	Floor Plan of the Demised Premises
EXHIBIT B	Work Agreement
EXHIBIT C	Rules and Regulations
EXHIBIT D	Form of First Amendment to Lease
EXHIBIT E	Rules for Contractors
EXHIBIT F	Form of Letter of Credit
RIDER 1	Rent Abatement
RIDER 2	Extension Option

INITIAL HERE	
Landlord <i>E</i>	Tenant <i>mpc</i>

BASIC LEASE INFORMATION

LANDLORD: National Place Lease Company, LLC

LANDLORD'S ADDRESS FOR NOTICES: 1001 G Street, N.W., Suite 900
Washington, D.C. 20001
Attn: Legal Department, General Counsel
Fax # (202) 638-2301

TENANT: Council of the Great City Schools, an Illinois non-profit corporation

TENANT'S ADDRESS FOR NOTICES:

Prior to taking occupancy: Council of the Great City Schools
 1301 Pennsylvania Avenue, N.W., Suite 702
 Washington, D.C. 20004
 Attn: Michael Casserly, Executive Director

Following occupancy: At the Demised Premises
 Attn: Michael Casserly, Executive Director

BUILDING: The multi-use office, commercial, parking and legitimate theatre project located at: 1331 and 1325 Pennsylvania Avenue, Washington, D.C.

LAND: The tax lot on which the Building is situated.

PROPERTY: The Building and the Land.

DEMISED PREMISES: The premises located on a portion of the eleventh (11th) floor of the Building, as more fully described in Section 1 of the Lease and shown on the floor plan attached as **Exhibit A** to the Lease.

GROSS OFFICE RENTABLE AREA OF THE BUILDING: 410,205 square feet, which is the gross rentable area of the above-grade office space in the Building, as determined by Landlord's architect pursuant to the modified BOMA Method of Measurement (ANSI-1996) ("**BOMA**"). All references to "Gross Rentable Area" mean measurements done pursuant to BOMA.

GROSS RENTABLE AREA OF THE DEMISED PREMISES: 8,293 square feet, which is the gross rentable area of the Demised Premises, as determined by Landlord's architect pursuant to BOMA. The measurement of the initial Demised Premises shall not change during the Term, except pursuant to an expansion or contraction of the Demised Premises pursuant to the terms of the Lease.



LEASE COMMENCEMENT DATE: July 1, 2016, subject to adjustment pursuant to Section 2 of the Lease.

LEASE EXPIRATION DATE: June 30, 2027, subject to adjustment pursuant to Section 2 of the Lease.

TERM: One Hundred Thirty-Two (132) full calendar months from and after the Lease Commencement Date, unless the Term is extended or is earlier terminated in accordance with the terms of this Lease.

BASE RENT: The base rent payable by Tenant with respect to the

vi

INITIAL HERE	
Landlord 	Tenant 

Demised Premises for the indicated periods during the Term shall be as follows:

Period	Rate per Square Foot	Base Rent	Monthly Base Rent
Lease Commencement Date – 12/31/17	\$43.00	\$356,598.96*	\$29,716.58
1/1/18 – 12/31/18	\$44.08	\$365,555.40	\$30,462.95
1/1/19 – 12/31/19	\$45.18	\$374,677.80	\$31,223.15
1/1/20 – 12/31/20	\$46.31	\$384,048.84	\$32,004.07
1/1/21 – 12/31/21	\$47.47	\$393,668.76	\$32,805.73
1/1/22 – 12/31/22	\$48.66	\$403,537.44	\$33,628.12
1/1/23 – 12/31/23	\$49.88	\$413,654.88	\$34,471.24
1/1/24 – 12/31/24	\$51.13	\$424,021.08	\$35,335.09
1/1/25 – 12/31/25	\$52.41	\$434,636.16	\$36,219.68
1/1/26 – 12/31/26	\$53.72	\$445,500.00	\$37,125.00
1/1/27 – Lease Expiration Date	\$55.06	\$456,612.60*	\$38,051.05
[*on an annualized basis]			

RENTAL ABATEMENT:

Twelve (12) months of Base Rent will be abated pursuant to, and as more particularly provided in, **Rider 1**.

ADVANCE RENT:

One (1) months' Base Rent (equal to \$29,716.58).

EXPENSE SHARE STOP:

The amount obtained by dividing (i) the sum of the Real Estate Taxes (as defined in Section 4 of the Lease) plus the Operating Costs (as defined in Section 4 of the Lease) incurred during calendar year 2016 by (ii) the Gross Office Rentable Area of the Building.

BROKERS:

Cushman & Wakefield, as Landlord's broker, and DiRenzo Realty, LLC, as Tenant's broker.

SECURITY DEPOSIT AMOUNT:

\$29,716.58.

TENANT WORK ALLOWANCE:

Eighty-Seven Dollars (\$87.00) per square foot of Gross Rentable Area of the Demised Premises, subject to a Five Dollar (\$5.00) per square foot deferral pursuant to the terms of **Exhibit B**.

BUILDING HOURS:

Between 8:00 a.m. and 7:00 p.m., Monday through Friday and between 9:00 a.m. and 3:00 p.m. on Saturdays, except Holidays (hereinafter defined). The term "**Holidays**" shall mean any and all federally designated holidays.

PARKING SPACES:



Eight (8) monthly parking contracts for unreserved parking spaces.

EXTENSION OPTION:

Tenant has a right to negotiate to extend the Term for one (1) additional period of five (5) consecutive years pursuant to, and as more particularly provided in, **Rider 2**.

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The foregoing Basic Lease Information is hereby incorporated into and made a part of the Lease. Each of the above items in the left hand column that are bolded and capitalized shall be deemed a defined term under the Lease. Each reference in the Lease to any information and definitions contained in the Basic Lease Information shall mean and refer to the information and definitions hereinabove set forth. References in this document to the "**Lease**" shall mean the Basic Lease Information, the body of the Lease, and any Exhibits, Addenda, or Riders thereto. The provisions of the body of the Lease shall be read to implement the Basic Lease Information.

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LEASE

THIS LEASE is made and entered into on the date set forth on the cover page hereof by Landlord and Tenant.

1. Demised Premises.

(a) Landlord hereby conveys, bargains, grants and leases a leasehold interest in the Demised Premises to Tenant, and Tenant hereby leases a leasehold interest in the Demised Premises from Landlord, for the Term and upon the terms and conditions hereinafter provided. Landlord shall finish the Demised Premises in accordance with, and subject to the provisions set forth in **Exhibit B** attached hereto and made a part hereof. It is understood and agreed that Landlord will not make, and is under no obligation to make, any structural or other alterations, decorations, additions or improvements in or to the Demised Premises from its "as is" condition, except as set forth in **Exhibit B** attached hereto.

(b) No easement for light and air is incorporated in the Demised Premises. The Gross Rentable Area of the Demised Premises set forth in the Basic Lease Information shall conclusively be deemed to be the Gross Rentable Area of the Demised Premises for purposes of this Lease.



2. Term.

(a) (1) This Lease shall be effective as of the date hereof. The Term shall commence on the Lease Commencement Date and expire at midnight on the Lease Expiration Date. In the event that the Demised Premises are not substantially completed, or Landlord is otherwise unable to tender possession of the Demised Premises to Tenant, by the Lease Commencement Date for any reason or cause, other than as a result of a Tenant-Caused Delay (as defined in **Exhibit B** attached hereto), then the Lease Commencement Date shall be delayed and shall be the earlier of (i) the date that the Demised Premises are occupied by Tenant or (ii) the date that the Demised Premises are substantially completed (as defined in Section 2(a)(2), below) and possession of the Demised Premises is tendered to Tenant. In the event the Lease Commencement Date is delayed, Landlord shall not be liable or responsible for any claims, damages, or liabilities by reason of such delay and the Lease Expiration Date shall be postponed by the same number of days the Lease Commencement Date is delayed. Notwithstanding the foregoing, in the event that the Demised Premises are not substantially completed, or Landlord is otherwise unable to tender possession of the Demised Premises to Tenant, by the Lease Commencement Date as a result of a Tenant-Caused Delay (as defined in **Exhibit B**), then the Lease Commencement Date and all the obligations of Tenant hereunder, including, but not limited to, the obligations of Tenant to pay Base Rent and Additional Rent, shall not be delayed and shall begin on [the Lease Commencement Date specified in the Basic Lease Information. If, as a result of the provisions of this Section 2, the Lease Expiration Date would be a day other than the last day of the month, the Lease Expiration Date shall be extended through the last day of the month.

(2) For purposes of this Lease, the Demised Premises shall be deemed substantially completed when all items of Tenant Work, excluding specialized or long lead time items, have been completed, subject only to punch list items of work which do not substantially interfere with Tenant's use of the Demised Premises for general office use.

(b) In the event the Demised Premises are occupied by Tenant prior to the Lease Commencement Date (subject to the terms of Section 2(d), below), such tenancy shall be deemed to be by the day, and all of Tenant's obligations hereunder shall commence as of the first day of such occupancy, and the length of the Term shall be appropriately adjusted so that the Lease Expiration Date is as stated in the Basic Lease Information. The foregoing sentence shall not be deemed to imply a right of Tenant to occupy the Demised Premises prior to the Lease Commencement Date (subject to the terms of Section 2(d), below).

(c) Tenant shall execute and deliver a First Amendment to Lease (setting forth the Lease Commencement Date and Lease Expiration Date and otherwise substantially in the form of **Exhibit D**

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attached hereto and made a part hereof) within five (5) days after Landlord prepares and provides such First Amendment to Tenant.



(d) In the event that the Demised Premises is not substantially completed by Landlord on or before the Abatement Date (hereinafter defined), then Tenant shall be entitled to an abatement of one (1) day of Base Rent (the "Per Diem Base Rent") for each day that substantial completion of the Demised Premises is delayed beyond the Abatement Date as a result thereof. The Per Diem Base Rent shall be (i) the Base Rent payable hereunder during the first Lease Year, divided by (ii) three hundred sixty-five (365). The "Abatement Date" shall be the date that is sixty (60) days after the Lease Commencement Date (as set forth in the Basic Lease Information), which Abatement Date shall be extended by one (1) day for each day that substantial completion of the Demised Premises is delayed as a result of any Tenant-Caused Delay or event of Force Majeure (hereinafter defined). The term "Lease Year" shall mean each calendar year during the Term, except the first Lease Year shall mean the period commencing on the Lease Commencement Date and expiring on December 31, 2017, as set forth in the Basic Lease Information.

(e) Subject to the terms and conditions set forth below and provided that Tenant has furnished Landlord with evidence of Tenant's insurance in accordance with the terms of Section 12, below, Tenant and its consultants and contractors shall be permitted to enter the Building and the Demised Premises during the fourteen (14) day period (the "Pre-Occupancy Period") immediately preceding the Lease Commencement Date for the purpose of installing Tenant's furniture, fixtures, equipment and cabling and wiring in the Demised Premises; provided that such access by Tenant during the Pre-Occupancy Period shall not interfere with, or delay the completion of, the Tenant Work. Tenant shall not be required to pay any Rent (hereinafter defined) in connection with its entry into the Demised Premises during the Pre-Occupancy Period. In connection with the undertaking of any work by Tenant in the Demised Premises during the Pre-Occupancy Period, Tenant's contractors shall comply with the Rules for Contractors attached hereto as Exhibit E. Landlord shall determine, and give reasonable advance notice to Tenant of, the days and hours of the day during which Tenant's contractors may undertake work in the Demised Premises during the Pre-Occupancy Period in order to coordinate such schedules with those of the contractors and subcontractors performing portions of the Tenant Work, which schedule shall be subject to change by Landlord upon reasonable advance notice to Tenant. Any delay in completing the Tenant Work resulting from (i) Tenant's contractors' failure to abide by the terms of such schedule, or (ii) interference by Tenant's contractor(s) with the contractors and subcontractors undertaking the Tenant Work shall constitute a Tenant-Caused Delay, and the Lease Commencement Date shall be deemed to have occurred as of the date the Lease Commencement Date would have otherwise occurred but for such Tenant-Caused Delay.

3. Base Rent; Additional Rent.

(a) (1) Base Rent is the amount set forth in the Basic Lease Information as it may be adjusted from time to time pursuant to the terms of the Lease. **"Additional Rent"** is any and all rent, payments, charges and all other monetary sums, other than Base Rent, payable hereunder, whether due and payable immediately or in monthly installments. Throughout this Lease, Base Rent and Additional Rent are sometimes collectively referred to as the **"Rent."**



(2) Base Rent shall be due and payable, in advance, in equal monthly installments, commencing on the Lease Commencement Date, subject to the terms of Rider 2. Tenant's Expense Increase Share (as hereinafter defined) shall be due and payable, in advance, in equal monthly installments, commencing on January 1, 2018. Advance Rent (as defined in the Basic Lease Information) shall be paid upon the signing of this Lease, and shall be applied toward the first installment of Base Rent coming due under this Lease. Base Rent for any partial month during the Term shall be prorated on a daily basis based upon a thirty (30)-day month and shall be paid in advance. All payments of Base Rent shall be due and payable on the first day of each and every calendar month during the Term for which Base Rent is due and payable. All payments of Additional Rent shall be due and payable on the first day of each and every calendar month during the Term (unless otherwise expressly provided in other Sections of this Lease or in a written notice from Landlord). All payments of Rent shall be made to Landlord at Landlord's Address for Notices as set forth in the Basic Lease Information, or to such other party or at such other office as Landlord may designate from time to time by written notice to Tenant. All

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payments of Rent shall be made without deduction, set off or counterclaim, and, except as otherwise expressly set forth herein, without demand, notice or invoice. If Landlord shall at any time or times accept Rent after it shall become due and payable, such acceptance shall not excuse delay upon subsequent occasion, or constitute, or be construed as, a waiver of any or all of Landlord's rights hereunder. Tenant shall not pay any Rent more than thirty (30) days prior to the date such Rent is due, without Landlord's written consent; and in the event Tenant does pay any Rent more than thirty (30) days prior to the date such Rent is due, Landlord shall be entitled (but shall have no obligation) to return such Rent, hold such Rent as a security deposit in accordance with the terms of this Lease or apply such Rent against the next payment of Rent coming due under this Lease. If the address designated by Landlord for payment of Rent hereunder is a lock box collection agent, then for purposes of this Lease, no such payment shall be deemed "accepted" by Landlord if such payment is made to Landlord and not to the lock box collection agent and within thirty (30) days after Landlord's receipt of same Landlord either (i) issues a check payable to Tenant in the amount sent to Landlord or (ii) returns the payment. Notwithstanding anything contained herein to the contrary, no acceptance of Rent shall be deemed a waiver of any breach by Tenant or of any right or remedy of Landlord on the account of any breach hereunder (including the failure to timely pay such Rent). In addition, any acceptance of less than the full amount of any Rent payable hereunder shall not be deemed a release of Tenant's obligation to pay the remainder, nor constitute an accord and satisfaction or a waiver of any rights or remedies of Landlord available on account thereof.

(b) Tenant shall pay to Landlord, at Landlord's Address for Notices set forth in the Basic Lease Information (or such other place or to such agent as Landlord may from time to time designate in writing), any and all installments of Base Rent and Additional Rent (whether such Additional Rent is being paid on an installment or other basis) in immediately available funds in lawful United States legal tender (or by good check drawn on a United States bank) to be received by Landlord on or before the date the same become due and payable. If Landlord receives two (2) or more checks from Tenant which are returned by Tenant's bank unpaid for any reason or, if there shall exist a default (beyond any applicable notice and cure period), Tenant agrees that all payments thereafter shall be by wire transfer, bank certified check or bank cashier's check.

(c) If Tenant fails to pay in the manner provided in Section 3 hereof any installment of Base Rent or any Additional Rent (whether such Additional Rent is being paid on an installment or other basis) on or before the date the same becomes due and payable, such unpaid installment of Base Rent or Additional Rent, as the case may be, shall bear interest at the Interest Rate (hereinafter defined) per annum from the date such installment of Base Rent or Additional Rent became due and payable to the date of the payment thereof by Tenant. The term "Interest Rate" shall mean the greater of the following rates on a per annum basis: (i) eight percent (8%), or (ii) the Prime Rate in effect from time to time (as published from time to time by The Wall Street Journal, which rate is currently calculated based upon the corporate loan rates of the nation's largest banks), plus three percentage points (3%). In addition, if Tenant fails to pay in the manner provided in Section 3 hereof any such installment of Base Rent or Additional Rent within five (5) days after the same becomes due and payable, Tenant shall pay to Landlord a late payment charge equal to five percent (5%) of the amount of such installment of Base Rent or Additional Rent; provided, however, that on the first occasion of the late payment of Rent in any twelve (12)-month period, and no more than once in any twelve (12)-month period, Landlord agrees to waive its right to collect late charges on such payment of Rent if such payment is made no later than the fifth (5th) day after Landlord delivers to Tenant written notice of such late payment. No payment by Tenant of any interest or late payment charge shall relieve Tenant from the obligation to make any other payments due under this Section 3 or any other provision of this Lease. Such interest and late payment charge shall constitute Additional Rent due and payable with the next monthly installment of Base Rent and, where applicable, Additional Rent. If Landlord does not bill Tenant for such interest or such late payment charge at the time of their respective accruals, such fact shall not be deemed a waiver by Landlord of its right to accumulate such interest and charges and to invoice Tenant on a periodic basis, nor shall Landlord be deemed to waive its right to such interest and charges or to any other amount owed or which becomes payable to it hereunder by Landlord's acceptance of any payment from, or by Landlord's furnishing services to, a party other than Tenant.

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4. Real Estate Taxes and Operating Costs.



(a) (1) For each Operating Cost Year (hereinafter defined), beginning on January 1, 2018, Tenant shall pay to Landlord, as Additional Rent, an amount ("**Tenant's Expense Increase Share**") determined as follows: the Real Estate Taxes (as hereinafter defined) and Operating Costs (as hereinafter defined) of the Building for the Operating Cost Year shall be totaled. That sum shall be divided by the number of the Gross Office Rentable Area of the Building. From that quotient shall be subtracted the Expense Share Stop. The result shall be multiplied by the Gross Rentable Area of the Demised Premises, and that product shall in turn be multiplied by a fraction, the numerator of which shall be the number of days of the Operating Cost Year that occur during the Term ("**Applicable Days in Operating Cost Year**") and the denominator of which shall be 365. An "**Operating Cost Year**" shall mean each entire calendar year that occurs either entirely within or partially within the Term commencing with calendar year 2018, it being understood that the entire calendar year in which the Term ends shall also be an Operating Cost Year. The product so determined shall be the dollar amount of Tenant's Expense Increase Share for such Operating Cost Year.

The foregoing calculation may be stated as a formula as follows:

$$\begin{array}{l}
 \text{Tenant's Expense} \\
 \text{Increase Share} \\
 \text{Area of the Building} \\
 \\
 \text{Gross Rentable Area of the Applicable Days in the Operating Cost Year} \\
 \\
 \text{Demised Premises } 365
 \end{array}
 =
 \left[
 \begin{array}{l}
 \text{Real Estate Taxes \& Operating Costs} \\
 \text{Expense} \\
 \text{Share Stop}
 \end{array}
 \right]
 \times
 \frac{\text{Gross Rentable Area of the Applicable Days in the Operating Cost Year}}{\text{Demised Premises } 365}$$



(2) Landlord shall have the right to elect, at any time or times during the Term, to change the Operating Cost Year from a calendar year to a fiscal year selected by Landlord. In the event Landlord makes such election (i) the Operating Cost Year shall be the new fiscal year selected by Landlord; and (ii) Tenant shall pay, and there shall be a separate calculation for, Tenant's Expense Increase Share in respect of the period beginning with the expiration of the previous Operating Cost Year and ending on the day prior to the first day of the new Operating Cost Year selected by Landlord, such period being hereinafter referred to as the "**Stub Period.**" Tenant's Expense Increase Share for the Stub Period shall be determined by multiplying Tenant's Expense Increase Share for the calendar year in which the Stub Period occurs by a fraction, the numerator of which shall be the number of months in the Stub Period, and the denominator of which shall be twelve (12). If Landlord changes the Operating Cost Year from a calendar year to a fiscal year, Landlord shall make the calculation set forth in this Section 4(a)(2) in a fair and equitable manner, avoiding economic distortions.

(b) "**Real Estate Taxes**" are hereby defined as any and all taxes, fees, charges and assessments (including without limitation, any payments to a business improvement district or similar entity and any payments "in lieu of" taxes, such as that portion of any ground rent payments made by Landlord that represent the pass-through of real estate taxes from any ground lessor to Landlord) allocable to the Building (except for that portion thereof that is allocable by Landlord to the retail space in the Building) and the Land, general and special, ordinary and extraordinary, foreseen or unforeseen, assessed, levied, or imposed upon the Building and the Land by any governmental, quasi-governmental, public or other authority having jurisdiction over the Building and the Land. Except for the taxes, fees, charges and assessments described in the next succeeding sentence, Real Estate Taxes shall not include any federal or state income tax, franchise taxes, transfer, inheritance or capital stock taxes. Taxes shall also exclude any interest or penalties arising by reason of the late payment of same, provided that Tenant is current on all payments of Rent payable to Landlord at the time such Taxes were due and at the time any penalties or interest was incurred. If as of the date hereof or at any time during the Term

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
there shall be imposed by any governmental, quasi-governmental, public or other authority having jurisdiction over the Building and the Land a gross receipts tax or other tax, fee, charge and/or assessment of any kind or nature upon, against or with respect to the Base Rent and/or Additional Rent payable hereunder or otherwise received from the Building, either in substitution of all or any part of the taxes, fees, charges and assessments levied or assessed against the Property, or in addition thereto, the entire amount of such gross receipts tax or other tax, fee, charge or assessment payable on account of the Base Rent and/or Additional Rent (as determined by Landlord) shall be paid promptly by Tenant whether such gross receipts tax or other tax, fee, charge or assessment is imposed nominally on Landlord or Tenant, such payment to be made either directly to the appropriate government, quasi-governmental, public or other authority (if such is required by such authority) or indirectly, by payment as Additional Rent to Landlord, which shall in turn be required to promptly pay over amounts received by it pursuant to the foregoing provisions to such authority.

(c) "Operating Costs" are hereby defined as any and all expenses, costs and disbursements relating to or allocable to the Building, including, without limitation, the cost of heating; cooling; utilities; insurance; janitorial and cleaning service; lobby host, if any is provided by Landlord; security services, if any are provided by Landlord; salaries, wages and other personnel costs of engineers, superintendents, watchmen and other Building employees, and other employees of Landlord and the employees of Landlord's agents and contractors allocable to Building or Property-related matters (provided, however, to the extent that employees of Landlord or employees of Landlord's agents are not assigned exclusively to the Building or the Property, then Operating Costs shall include only the portion of their salaries, wages and other personnel costs that Landlord reasonably allocates to the Building or the Property); charges under all maintenance, repair and service contracts, including, without limitation, for chillers, boilers, controls and/or elevators, security systems, exterior window cleaning, landscaping, common areas, public areas, lobbies, and Building and Land maintenance; all maintenance and repair expenses including, without limitation, the cost of all warranties included in contracts for the provision of materials or services to the Building to the extent the cost of such warranty is separately stated in such contract; the cost of enforcing warranties; the cost of supplies which are deducted (and not capitalized) for federal income tax purposes; management fees (except to the extent in excess of Permitted Management Fees, hereafter defined); accounting costs and fees; expenses incurred for attorneys or other third parties to appeal real estate tax assessments, including without limitation the expenses incurred to review the feasibility thereof; the cost of cleaning, repairing, maintaining and operating any Common Facilities; and all other costs and expenses incurred by Landlord in connection with the operation, servicing, maintenance and repair of the Building and the Land, including, without limitation, annual amounts amortizing the cost (together with interest on the unamortized portion thereof at the rate of ten percent (10%) per annum) of the following items incurred during the Term ("**Permitted Capital Expenditures**"): (i) furniture, fixtures, energy-saving and other equipment owned by Landlord and used in connection with the Building or the Land (including, without limitation, equipment used to maintain other equipment and all tools) and (ii) capital expenditures incurred either to reduce Operating Costs or to comply with any law, order or regulation of any governmental, quasi-governmental, public or other authority first effective after the date hereof. The term "**Permitted Management Fees**" shall mean the greater of (i) the market rate for management fees from other first-class office buildings in the general location of the Building providing services similar to, and to the same level as, those provided for the Building, and (ii) three percent (3%) gross receipts from the Building, which amount will be subject to increase based upon the gross up provisions of Section 4(f) hereof. Operating Costs shall not include (i) depreciation of the Building (except as otherwise provided herein), (ii) payments of principal and interest on any mortgages (hereinafter defined) encumbering the Building; (iii) the cost of painting, decorating or renovating a specific tenant's space (specifically excluding base building improvements and systems and the common areas of the Property), unless such items are similarly provided to, or benefit generally, other tenants in the Building; (iv) the cost of any repair, restoration, replacement or other item, to the extent Landlord is actually reimbursed therefor by insurance, warranties or condemnation proceeds; (v) leasing commissions, attorneys' fees and advertising costs incurred by Landlord to lease space in the Building to tenants or prospective tenants of the Building or in connection with disputes with tenants; and (vi) rental payments made under any ground lease, except with respect to any portion thereof relating to the pass-through of any operating costs or real estate taxes incurred by the ground lessor; (vii) expenses for any item or service not offered to Tenant, but provided to certain other tenant(s) in the Building without a

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charge therefor, (viii) expenses incurred by Landlord in connection with any financing or sale of the Building or the Land; (ix) improvements that under generally accepted accounting principles are properly classified as capital improvements, other than Permitted Capital Expenditures; (x) salaries of employees above the grade of building superintendent or building manager who are not assigned exclusively to the Building, other than the vice president and the assistant vice president of operations, operation center employees and other employees that provide engineering, repair, maintenance, operation and security services to the Building and other buildings managed by Landlord (or an affiliate of Landlord); provided, however, that the reasonable compensation paid for such operation center employees and such other employees providing the foregoing services shall be allocated among the buildings to which its services relate, and Operating Costs shall include only the portion thereof that Landlord allocates to the Building; (xi) general overhead and administrative expenses of Landlord relating to maintaining Landlord's existence and functioning either as a corporation, partnership or other entity (as opposed to such costs relating to the Building operations and management, which may be included in Operating Costs); (xii) the profit increment paid by Landlord for services to a corporation or entity controlled by or under common control with Landlord, to the extent the total amounts paid by Landlord for such services are not comparable to amounts paid for similar services provided to Class A office buildings in Washington, D.C. providing services similar to, and to the same level as, those provided for the Building; it being understood that for purposes of this exclusion item, "control" shall be deemed to be ownership of more than fifty percent (50%) of the stock or other voting interest of the controlled corporation or other business entity; (xiii) any costs of repairs incurred as a result of the gross negligence or willful misconduct of the Landlord, but only to the extent such costs would not have been incurred but for such gross negligence or willful misconduct; (xiv) penalties or fines incurred due to the violation by the Landlord (with actual knowledge of such violation) of any laws, rules, regulations or ordinances applicable to the Building, unless the violation results from the act or omission of Tenant, any other tenant of the Building or any other cause other than Landlord's act or omission; (xv) any interest or penalties due for late payment by Landlord of any of the Operating Costs, provided that Tenant is current on all payments of Rent payable to Landlord at the time such Operating Costs were due and at the time any penalties or interest was incurred; (xvi) costs which apply solely to the retail space in the Building; (xvii) rentals for equipment (except for temporary rentals or rentals needed in connection with emergencies or normal repairs and maintenance of permanent systems) which if purchased, rather than rented, would constitute a capital improvement (except for items that would be Permitted Capital Expenditures and equipment not affixed to the Building which is used in providing janitorial, security, or other similar services); and (xviii) costs and expenses of remediating Hazardous Materials on, under or about the Building or Land to the extent such Hazardous Materials (a) exist therein as of the date hereof in violation of any Applicable Laws then in effect or (b) were introduced to the Building by Landlord, or its agents or employees in violation of any Applicable Laws then in effect.

Notwithstanding anything to the contrary set forth in this Lease, Landlord shall not include in Operating Costs during any calendar year of the Term up to and through calendar year 2022 that portion of Controllable Expenses (hereinafter defined) during such calendar year which exceeds the Controllable Expenses Cap (hereinafter defined) for such calendar year. As used herein, the term "**Controllable Expenses Cap**" for (i) calendar year 2016 shall be the aggregate amount of Controllable Expenses incurred in calendar year 2016, and (ii) for each calendar year thereafter shall be an amount equal to the greater of (a) one hundred five percent (105%) of the Controllable Expenses Cap that was effective in the immediately preceding calendar year or (b) one hundred five percent (105%) of the actual amount of Controllable Expenses incurred in the immediately preceding calendar year. As used herein, the term "**Controllable Expenses**" shall mean the following categories of Operating Costs, except to the extent the cost of any item in such categories (including without limitation any compensation or fees paid to an individual or entity) is established by a collective bargaining or similar agreement: (A) management fees; (B) janitorial services; (C) landscaping costs; (D) elevator maintenance contract; and (E) fixed-price service contracts, but only to the extent such costs are within the exclusive control of Landlord to determine. Notwithstanding the foregoing, the terms of this paragraph shall not preclude Landlord from passing through Controllable Expenses in calendar years following the calendar year in which such Controllable Expenses were incurred if such Controllable Expenses, when added to Controllable Expenses incurred in a subsequent calendar year, do not exceed the Controllable Expenses Cap for any such subsequent calendar year.

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(d) At any time or times prior to or during an Operating Cost Year from and after calendar year 2018, Landlord may submit to Tenant a statement ("**Estimate Expense Statement**") of Landlord's estimates of Tenant's Expense Increase Share for such Operating Cost Year. If such estimate is submitted prior to an Operating Cost Year, Tenant shall pay to Landlord one-twelfth (1/12) of the amount so estimated on the first day of each month in advance, commencing on the first day of the Operating Cost Year. In the event such estimate is submitted during an Operating Cost Year, Tenant shall continue paying the previous Operating Cost Year's Tenant's Expense Increase Share until such estimate is submitted. Within thirty (30) days after such Estimate Expense Statement is submitted to Tenant, Tenant shall (i) make a lump sum payment to Landlord equal to one-twelfth (1/12) of the difference between Tenant's Expense Increase Share for the current Operating Cost Year and Tenant's Expense Increase Share for the previous Operating Cost Year, multiplied by the number of months in such current Operating Cost Year that will have elapsed prior to the first monthly payment required by clause (ii) hereof, and (ii) begin paying to Landlord, as Additional Rent, due and payable on the first day each month, an amount equal to one-twelfth (1/12) of Tenant's Expense Increase Share. After the expiration of each Operating Cost Year and the preparation of the annual statement of Real Estate Taxes and Operating Costs for such Operating Cost Year (which Landlord shall use reasonable efforts to perform within one hundred eighty (180) days following the expiration of each Operating Cost Year), Landlord shall submit to Tenant a statement ("**Expense Statement**") showing the determination of Tenant's Expense Increase Share. If such Expense Statement shows that the total of Tenant's monthly payments pursuant to this Section 4(d) exceed Tenant's Expense Increase Share, then Landlord shall credit such excess against the next installments of Tenant's Expense Increase Share coming due; provided that if the Term has expired, Landlord will refund such overpayment with the notice. Notwithstanding the foregoing, Tenant shall not be entitled to such credit or refund while Tenant is in default under any provision of this Lease; provided, however, Landlord shall be entitled to apply such credit or refund toward any monies owed by Tenant to Landlord. If such Expense Statement shows that Tenant's Expense Increase Share exceeded the aggregate of Tenant's monthly payments pursuant to this Section 4(d) for the preceding Operating Cost Year, then Tenant shall, within thirty (30) days after receiving the Expense Statement, pay such deficiency to Landlord. Monthly estimated payments of Tenant's Expense Increase Share for a partial Operating Cost Year shall be made on the same basis as set forth above in this Section 4(d).

(e) If Real Estate Taxes paid by Landlord for an Operating Cost Year, or any part thereof, for which Tenant has paid Tenant's Expense Increase Share, are refunded to Landlord as a result of a final determination of such Real Estate Taxes, then, Tenant shall be entitled to a refund of Tenant's Expense Increase Share in an amount equal to Tenant's share of such refund (net of expenses incurred to obtain the refund). Landlord shall notify Tenant of the amount of any refund due Tenant, and Landlord shall credit such refund against the next installments of Tenant's Expense Increase Share coming due; provided that if the Term has expired, Landlord will pay such refund to Tenant within thirty (30) days after its receipt of such refund. Notwithstanding the foregoing, Tenant shall not be entitled to such credit or refund while Tenant is in default under any provision of this Lease provided; however, Landlord shall be entitled to apply such credit or refund toward any monies owed by Tenant to Landlord. Landlord shall make reasonable efforts to locate Tenant if Real Estate Taxes accruing during the Term are refunded after the Term has ended. If Landlord is, despite such effort, unable to locate Tenant, then Landlord shall be entitled to retain the refund for its own use.



(f) If for any period during the Term less than ninety-five percent (95%) of the Gross Office Rentable Area of the Building is occupied by tenants, then, in calculating Operating Costs for such period, Landlord shall increase those components of Operating Costs (that vary with occupancy) that Landlord reasonably believes would have been incurred during such period assuming the Building were ninety-five percent (95%) occupied. In addition, if for any period during the Term any part of the Building is leased to a tenant who, in accordance with the terms of its lease, provides its own cleaning services and/or any other services otherwise included in Operating Costs, then Operating Costs for such period shall be increased by the additional costs for cleaning and/or such other applicable expenses that Landlord reasonably estimates would have been incurred by Landlord if Landlord had furnished and paid for cleaning and/or such other services for the space occupied by such tenant.

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5. Use of Demised Premises.

(a) Tenant will use and occupy the Demised Premises solely for general office purposes consistent with a first-class office building in the metropolitan Washington, D.C. area, and in accordance with the use permitted under applicable zoning regulations. The Demised Premises will not be used for any other purposes. Tenant will not use or occupy the Demised Premises for any unlawful purpose. Tenant, at Tenant's sole expense, shall comply with, and make any and all alterations to and within the Demised Premises in the manner allowed under Section 9 hereof as may be necessary to effect compliance with, any and all present and future laws, rules, ordinances, regulations, and orders of any governmental, quasi-governmental, public or other authority having jurisdiction over the Property (or any part thereof), including without limitation The Americans with Disabilities Act (collectively, the "**Applicable Laws**"). Except as provided in the immediately following sentence, Tenant shall not be required to make any alterations to the common areas of the Building or any common restrooms in the Demised Premises (i.e., the restrooms on a floor leased entirely by Tenant that would have been part of the common area had Tenant not leased the entire leasable area on such floor) in order to comply with the Americans with Disabilities Act ("ADA"). Notwithstanding anything contained in this Lease to the contrary, if Landlord makes any alteration to any part of the Property in order to comply with (or cure a violation of) any requirement of any Applicable Laws (including without limitation, any requirement of ADA) and such requirement (or violation) is a result of Tenant's particular business or use of the Demised Premises or results from any damage or alteration to the Demised Premises caused or made by or on behalf of Tenant, then Tenant shall reimburse Landlord for the cost thereof within thirty (30) days after Landlord provides to Tenant an invoice therefor. Tenant warrants that it has entered into this Lease entirely for a business or commercial purpose and that it shall not use the Demised Premises for any residential purpose, or for any retail purpose. If any Applicable Law requires a permit or license for Tenant's operation of the business conducted in the Demised Premises (other than a certificate of occupancy for general office use), then Tenant shall obtain and keep current such permit or license at Tenant's expense and shall promptly deliver a copy thereof to Landlord. Tenant shall not do or permit anything to be done in or about the Demised Premises which will in any way obstruct or interfere with the rights of other tenants of the Building, or injure or annoy them; use or allow the Demised Premises to be used for any improper, immoral, or objectionable purpose; cause, maintain or permit any nuisance in, on, or about the Demised Premises or commit or allow to be committed any waste in, on, or about the Demised Premises. Tenant shall keep all doors leading from the Demised Premises to the rest of the Building closed when not in use. Tenant shall (i) maintain the Demised Premises in a clean, orderly, and sanitary condition, free of insects, rodents, vermin and other pests, subject however to Landlord's obligations set forth herein to provide janitorial services, (ii) keep all mechanical apparatus free of vibration and noise, (iii) comply with the reasonable recommendations of Landlord's casualty insurer(s) and other applicable insurance rating organizations now or hereafter in effect, and (iv) conduct its business in all respects in a dignified manner in accordance with high standards of operation consistent with the quality of operation of the Building. Tenant shall not solicit any business in the common areas of the Building.

(b) In addition to and not in limitation of the other restrictions on use of the Demised Premises set forth in this Section 5, Tenant hereby agrees that the following uses of the Demised Premises shall not be considered to be "office use" and shall not be permitted: (1) any use of the Demised Premises by an organization or person enjoying sovereign or diplomatic immunity; (2) any use of the Demised Premises by or for any medical, mental health or dental practice; (3) any use of the Demised Premises by or for an employment agency or bureau; (4) any use of the Demised Premises for classroom purposes (other than internal training purposes); (5) any use of the Demised Premises by or for any user which distributes governmental or other payments, benefits or information to persons that personally appear at the Demised Premises; (6) any other use of the Demised Premises or any portion of the Property by any user that will attract a volume, frequency or type of visitor or employee to the Demised Premises or any portion of the Property or the Building which is not consistent with the standards of a high quality, first-class, office building in the metropolitan Washington, D.C. area or that will in any way impose an excessive demand or use on the facilities or services of the Demised Premises or the Building. Tenant acknowledges that the Building has, or in the future may seek, a USGBC or other "green agency" rating and, at Landlord's option, the Building will be operated pursuant to Landlord's sustainable practices (as the same may be modified by Landlord from time to time) and, in connection

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therewith, Tenant (i) shall comply with such practices, and (ii) shall not do or permit anything to be done in or about the Demised Premises that would in any way jeopardize any such rating.



(c) In addition to Tenant's obligation to pay Tenant's Expense Increase Share pursuant to Section 4 hereof, Tenant shall pay to the appropriate governmental authority, on or before such payment is due, any sales, documentary, excise, business, rent taxes, business, professional or occupational licensing taxes or other taxes or fees that are now or hereafter levied, assessed or imposed upon Tenant, Tenant's use or occupancy of the Demised Premises, the conduct of Tenant's business at the Demised Premises or Tenant's equipment, fixtures, furnishings, inventory, equipment or personal property or, to the extent not included in Real Estate Taxes, any leasehold improvements installed by or on behalf of Tenant. If any such tax or fee is now or hereafter levied against Landlord, or Landlord is responsible for collection or payment thereof, then Tenant shall pay to Landlord as Additional Rent the amount of such tax or fee.

6. Assignment.

(a) (1) Tenant shall not assign this Lease, except as permitted under the terms of this Lease. If at any time during the Term, Tenant desires to assign this Lease, Tenant shall give Landlord written notice of Tenant's desire to do so ("**Initial Assignment Notice**"). Other than in connection with an assignment to a Qualified Tenant Affiliate (hereinafter defined) pursuant to Section 6(e) hereof (which assignment is disclosed in the Initial Assignment Notice), within thirty (30) days after receipt of an Initial Assignment Notice from Tenant, Landlord shall have the right, in its sole discretion, to terminate this Lease by giving Tenant written notice of such termination, the effective date of which termination shall be thirty (30) days after Landlord's written notice to Tenant. As of the effective date of such termination, the Term shall expire as if such date was the date originally set forth in the Lease as the Lease Expiration Date.

(2) If Landlord does not terminate this Lease as provided above, Tenant may assign this Lease provided that Tenant first obtains Landlord's prior written consent, which consent shall not be unreasonably withheld, conditioned or delayed provided that Landlord determines that the business operations of the proposed assignee do not conflict with any exclusivity or other limitation that may be imposed upon Landlord and that the proposed assignee (i) is of a type and quality consistent with the first-class nature of the Building; (ii) has the financial capacity and creditworthiness to undertake and perform the obligations of this Lease; (iii) proposes to use the Demised Premises only for general office purposes and not for any purposes prohibited hereunder; (iv) is not a tenant in the Building, unless Landlord does not have, and will not have within five (5) months, comparable space to the Demised Premises available within the Building; and (v) is not a party by whom any suit or action could be defended on the ground of sovereign immunity. In order to obtain such consent Tenant shall, within ninety (90) days of Tenant's Initial Assignment Notice, submit to Landlord written notice ("**Tenant's Assignee Notice**") containing the following information: (a) audited (if available) financial statements and tax returns of the proposed assignee for its three (3) most recent fiscal years as well as year-to-date financial statements as of the quarter ending immediately prior to Tenant's Assignee Notice, all of which statements have been certified as correct and complete in all material respects by an independent certified public accountant or the chief financial officer of the assignee, (b) the effective date of the proposed assignment, and (c) the identity of the assignee, including the assignee's exact legal name, identity of the assignee's owners (unless publicly held), officers and directors and the business of the assignee. In no event shall the proposed effective date of assignment be less than thirty (30) days after the date of Tenant's Assignee Notice (together with the information required hereunder) to Landlord. Landlord shall have thirty (30) days from the receipt of Tenant's Assignee Notice (together with the information required hereunder) to review Tenant's request and to notify Tenant whether it will consent to such proposed assignee. In determining whether or not to give its consent, Landlord shall have the right to consider whether or not the proposed assignee is as financially responsible as Tenant on the date hereof, and shall have the right to require an additional security deposit from the proposed assignee as a condition of granting its consent.

(3) If Landlord does not exercise its right to terminate this Lease, and either (i) Tenant fails to submit Tenant's Assignee Notice (in accordance with the foregoing requirements) to Landlord within one hundred eighty (180) days after Tenant sends Tenant's Initial Assignment Notice, or

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(ii) Tenant fails to assign this Lease to the assignee permitted by Landlord within one hundred eighty (180) days after Landlord consents to such assignment, then, before Tenant may assign this Lease, Tenant shall notify Landlord again in writing of Tenant's desire to assign this Lease (in the manner set forth in Section 6(a)(1), above), and Landlord shall again have the right to terminate this Lease, in Landlord's sole discretion, in accordance with this Section 6(a). If Tenant does assign this Lease when permitted to do so under the provisions of this Section 6, all of Tenant's options under this Lease to renew or extend the Term or to lease additional space, and any other option, right of first refusal, right of first negotiation, termination rights, excess parking rights, signage rights (other than suite entry signage rights) and similar rights shall, upon the date of assignment, be null and void and forever terminated, except in the event of an assignment to a Qualified Tenant Affiliate.

(4) Notwithstanding any provision in this Lease to the contrary, Tenant shall not be permitted to assign this Lease at any time while (i) Tenant is in default of any non-monetary provision of this Lease (beyond any applicable notice and cure period expressly set forth in Section 19(a)(2) hereof), or (ii) Tenant is in default of any monetary provision of this Lease. In addition, no assignee shall be entitled to take possession of any portion of the Demised Premises unless and until Tenant has cured any and all defaults by Tenant of any provision of the Lease.

(b) In the event of an assignment (other than to a Qualified Tenant Affiliate), Tenant shall pay to Landlord a reasonable fee to cover accounting costs, and all legal fees, incurred by Landlord in connection with such assignment not to exceed \$2,500.00 in the aggregate. In the event of any assignment, such assignee shall assume in writing all of the obligations and liabilities of Tenant under this Lease and Tenant shall remain fully liable to perform the obligations of Tenant under this Lease, such obligations to be joint and several with the obligations of the assignee as tenant under this Lease, without the need for any instrument confirming or acknowledging same. Upon Landlord's request, Tenant and each assignee shall execute Landlord's reasonable consent form, which, among other things, will confirm such joint and several liability. The consent by Landlord to any assignment shall not be construed as a waiver or release of Tenant from the terms of any covenant or obligation under this Lease, nor shall the collection or acceptance of rent from any assignee constitute a waiver or release of Tenant of any covenant or obligation contained in this Lease, nor shall any assignment be construed to relieve Tenant or the assignee from obtaining the prior written consent of Landlord to any further assignment.

(c) The term "**assign**" or "**assignment**" shall mean and refer to:

(1) any disposition or transfer (including any disposition or transfer to any franchisee) by Tenant of any or all of its rights and obligations under this Lease, whether voluntary, by operation of law, or otherwise;

(2) an imposition (whether or not consensual) of a lien, mortgage or encumbrance upon Tenant's interest in this Lease;

(3) an arrangement (other than a subletting) which allows the use and occupancy of the Demised Premises by any person or entity other than Tenant;

(4) a transfer or pledge in one or more transaction(s) of any stock or voting interest of Tenant (if Tenant is a corporation);

(5) a transfer or pledge in one or more transaction(s) of any partnership interests of Tenant (if Tenant is a partnership);

(6) a transfer or pledge in one or more transaction(s) of any ownership interest (equitable or legal) of Tenant (if Tenant is not a partnership or corporation); or

(7) the conversion of Tenant to a limited liability company, limited liability partnership or any other type of entity having limited liability.

Tenant shall not be entitled to assign, pledge or transfer less than all of its rights under this Lease, and any such assignment, pledge or transfer shall be deemed void. An assignment of this Lease by Tenant for less than the entire remainder of the Term is prohibited. Any attempted assignment of this Lease or all or any rights of Tenant hereunder or interest herein not in accordance with this Section 6 shall, at Landlord's option (exercised by providing written notice thereof), be void and of no force or effect.

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
Each and every approved assignee shall execute and deliver to Landlord, upon Landlord's request, an assumption of all of Tenant's obligations under this Lease in a form reasonably satisfactory to Landlord, and Tenant shall execute such document as Landlord shall request to confirm Tenant's continuing liability under this Lease. Tenant and assignee shall deliver to Landlord upon request a true copy of the assignment and assumption agreement by which Tenant assigns this Lease to such approved assignee and such approved assignee assumes same.

(d) If Landlord consents to an assignment of this Lease, Tenant shall pay to Landlord fifty percent (50%) of any Assignment Profit (hereinafter defined) derived by Tenant from such assignment (other than an assignment to a Qualified Tenant Affiliate). "Assignment Profit" means any amount paid or payable by an assignee to Tenant as consideration solely for such assignment and use of the improvements and furniture, fixtures and equipment therein (as opposed to consideration for any other assets of Tenant), other than an assignment to a Qualified Tenant Affiliate, less any reasonable out-of-pocket costs incurred by Tenant in connection therewith (including, but not limited to, advertising costs, brokerage commissions, legal fees, the cost of rent abatement, if any, provided to such assignee in connection with such assignment and the cost of improvements to the Demised Premises made by Tenant for such assignee). Within thirty (30) days after Tenant receives any amount from an assignee as consideration for an assignment, Tenant shall submit to Landlord a statement containing a reasonably detailed calculation of any Assignment Profit derived from such assignment, certified as correct by an officer of Tenant, and simultaneously with the delivery of such statement, Tenant shall pay Landlord fifty percent (50%) of any Assignment Profit shown by such statement. Upon Landlord's request, Tenant shall provide substantiation of Tenant's calculation of Assignment Profit reasonably satisfactory to Landlord.

(e) Notwithstanding the provisions of Section 6(a) and Section 7(a) hereof, Tenant shall have the right, without Landlord's consent, but with at least thirty (30) days' prior written notice (the "Affiliate Transfer Notice"), to assign this Lease or sublease all or a portion of the Demised Premises to a Qualified Tenant Affiliate, provided, that (x) the business operations of the proposed assignee (which shall be disclosed in the Affiliate Transfer Notice) do not conflict with any exclusivity or other limitation that may be imposed upon Landlord, and (y) no default exists hereunder and no event exists which event with notice and/or the passage of time would constitute a default hereunder if not cured within the applicable cure period. A "Qualified Tenant Affiliate" shall mean a corporation or other business entity which (i) shall control, be controlled by or be under common control with Tenant or which results from a merger with Tenant or which acquires all or substantially all of the business and assets of Tenant, (ii) is of a type and quality consistent with the first-class nature of the Building, (iii) has the financial capacity and creditworthiness to undertake and perform the obligations of this Lease (or has the financial capacity and creditworthiness to undertake and perform the obligations of the sublease, as applicable), (iv) is not a party by whom any suit or action could be defended on the ground of sovereign immunity; and (v) in the case of a merger or acquisition, has a net worth and general creditworthiness immediately after such merger or acquisition at least equal to the net worth and general creditworthiness of Tenant as of the date of this Lease. For purposes of the immediately preceding sentence, "control" shall be deemed to be ownership of more than fifty percent (50%) of the legal and equitable interest of the controlled corporation or other business entity. In the event of any assignment to a Qualified Tenant Affiliate, Tenant shall remain fully liable to perform the obligations of the Tenant under this Lease, such obligations to be joint and several with the obligations of the Qualified Tenant Affiliate as tenant under this Lease.

7. Subletting.

(a) (1) Tenant shall not sublet (or permit occupancy or use by other parties of) the Demised Premises or any part thereof, except as permitted under the terms of this Lease. If at any time during the Term, Tenant desires to sublet (or permit occupancy or use by other parties of) the Demised Premises or any part thereof, Tenant shall give Landlord written notice of Tenant's desire to do so, including the portion of the Demised Premises to be sublet, the period of time that Tenant desires to sublet such space and the size, location and configuration of the space to be sublet ("**Initial Sublet Notice**"). Other than in connection with a sublease to a Qualified Tenant Affiliate pursuant to Section 6(e) hereof and disclosed in the Initial Sublet Notice, within thirty (30) days after receipt of the Initial Sublet Notice from Tenant, Landlord shall have the right, in its sole discretion, to elect to take back and repossess (i.e., recapture) the portion of the Demised Premises proposed to be sublet by Tenant for the

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

period of time stipulated by Tenant; in which case, the Base Rent that Tenant is required to pay under this Lease for such portion of the Demised Premises for such period shall be waived and Tenant's Expense Increase Share that Tenant is required to pay under this Lease shall be adjusted accordingly during such period to reflect such square footage recaptured by Landlord. Notwithstanding the foregoing, if the Tenant proposes to sublet any space in the Demised Premises which space, when added to the other space in the Demised Premises then being sublet by Tenant, exceeds fifty percent (50%) of the Gross Rentable Area of the Demised Premises, then Landlord shall have the right, in its sole discretion, to elect to take back and repossess (i.e., recapture) the portion of the Demised Premises proposed to be sublet by Tenant for the entire remaining Term; in which event, effective as of the date that is thirty (30) days after Landlord's written notice to Tenant, the Term of the Lease with respect to such recaptured portion of the Demised Premises shall expire and the Base Rent payable hereunder by Tenant for such portion of the Demised Premises for the period after such effective date shall be waived and Tenant's Expense Increase Share that Tenant is required to pay hereunder for the period after such effective date shall be adjusted accordingly to reflect such square footage recaptured by Landlord, and Landlord shall, at its cost, perform such demising work as is necessary to separate the recaptured space from the remaining space in the Demised Premises.

(2) If Landlord does not exercise its right to recapture the space proposed to be subleased, Tenant may sublease such space to third parties provided Tenant first obtains Landlord's prior written consent in accordance herewith. In order to obtain such consent, Tenant shall, within ninety (90) days of Tenant's Initial Sublet Notice, submit to Landlord written notice of its intent to sublease ("**Tenant's Sublet Notice**") containing, in addition to the information contained in the Initial Sublet Notice, the proposed rent to be paid by the proposed sublessee and the identity of the proposed sublessee. Landlord shall have thirty (30) days from the receipt of Tenant's Sublet Notice (together with the financial statements of the proposed subtenant and other information required hereunder) to review Tenant's request and to notify Tenant whether it will consent to such proposed sublessee.

(3) If Landlord does not exercise its right to sublet as aforesaid, and either (i) Tenant fails to submit Tenant's Sublet Notice (in accordance with the foregoing requirements) to Landlord within ninety (90) days after Tenant sends Tenant's Initial Sublet Notice, or (ii) Tenant fails to sublet the portion of the Demised Premises to be sublet to the sublessee permitted by Landlord within sixty (60) days after the date of Landlord's consent to such subletting (or Tenant changes any of the material proposed provisions of such subletting, as stated in the Initial Sublet Notice), then, before Tenant may sublet any portion of the Demised Premises, Tenant shall notify Landlord again in writing of Tenant's desire to sublet the Demised Premises (in the manner set forth in Section 7(a)(1), above) and Landlord shall again have the right to elect to take back and repossess such space in accordance with this Section 7(a). If Tenant does sublet more than twenty-five percent (25%) of the Demised Premises when permitted to do so under the provisions of this Section 7 (other than to a Qualified Tenant Affiliate), all of Tenant's options under this Lease to renew or extend the Term or to lease additional space, and any other option, right of first refusal, right of first negotiation and similar rights shall, upon the date of such subletting, be null and void and forever terminated.

(4) Notwithstanding any provision in this Lease to the contrary, Tenant shall not be permitted to sublet the Demised Premises or any portion thereof while (i) Tenant is in default of any non-monetary provision of this Lease (beyond any applicable notice and cure period expressly set forth in Section 19(a)(2) hereof), or (ii) Tenant is in default of any monetary provision of this Lease. In addition, no subtenant shall be entitled to take possession of any portion of the Demised Premises unless and until Tenant has cured any and all defaults by Tenant of any provision of the Lease.

(b) Tenant shall not sublet or rent (or permit occupancy or use of) the Demised Premises, or any part thereof, without the prior written consent of Landlord, which consent shall not be unreasonably withheld, conditioned or delayed provided that Landlord determines that the business operations of the proposed sublessee or occupant do not conflict with any exclusivity or other limitations that may be imposed upon Landlord, and the proposed sublessee or occupant (i) is of a type and quality consistent with the first-class nature of the Building; (ii) has the financial capacity and creditworthiness to undertake and perform the obligations of the sublease; (iii) proposes to use the Demised Premises only for general office purposes and not for any purposes prohibited hereunder; (iv) is not a tenant of the Building, unless Landlord does not



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have, and will not have within nine (9) months, comparable space to the proposed sublet space available within the Building; and (v) is not a party by whom any suit or action could be defended on the ground of sovereign immunity. Without limitation of the foregoing, Landlord may require Tenant to obtain and submit current financial statements of any proposed subtenant prior to granting its consent and may require an additional security deposit from any proposed sublessee as a condition to granting its consent. In the event of a sublet, other than to a Qualified Tenant Affiliate, Tenant shall pay to Landlord a reasonable fee to cover accounting costs, plus any legal fees, incurred by Landlord in connection with the subletting not to exceed \$2,500.00 in the aggregate. In the event of any subletting, Tenant shall remain fully liable to perform the obligations of Tenant under this Lease. The consent by Landlord to any subletting shall not be construed as a waiver or release of Tenant from the terms of any covenant or obligation under this Lease, nor shall the collection or acceptance of rent from any such subtenant or occupant constitute a waiver or release of Tenant of any covenant or obligation contained in this Lease, nor shall any such subletting be construed to relieve Tenant from obtaining the prior written consent of Landlord to any further subletting. In the event that Tenant defaults hereunder, Tenant hereby assigns to Landlord the rent due from any subtenant and hereby authorizes each such subtenant to pay said rent directly to Landlord. Nothing in this Section 7, however, shall result in any obligation of Landlord to any subtenant of Tenant. Without limitation of the foregoing, it is understood and agreed that Landlord will not consent to any subletting by a subtenant. Neither the provision by Landlord of services to a subtenant nor the acceptance by Landlord of rent from a subtenant shall constitute a consent by Landlord to the subletting.

(c) If Landlord consents to a sublease of the Demised Premises or any portion thereof (the "**Sublet Space**"), Tenant shall pay to Landlord fifty percent (50%) of any Sublet Profit (hereinafter defined) derived by Tenant from such subletting other than to a Qualified Tenant Affiliate. "**Sublet Profit**" means the excess of (i) all sums paid or payable by the subtenant as rent or other consideration for the sublease (other than a security deposit), less Subletting Costs (hereinafter defined) over (ii) all sums paid to Landlord as Base Rent and Additional Rent allocable to the Sublet Space. "**Subletting Costs**" means all reasonable out-of-pocket costs incurred by Tenant in connection with such subletting, including, without limitation, advertising costs, brokerage commissions, legal fees, the cost of any rent abatement provided to such subtenant in connection with such subletting and the cost of improvements to the Demised Premises made by Tenant for such subtenant which costs shall be amortized over the term of the sublease. Any allocation of rent paid by a subtenant to Tenant between compensation for the use of the portion of the Demised Premises sublet and compensation for services provided to the subtenant by or on behalf of Tenant, or for equipment which Tenant furnishes to the subtenant, must be reasonable. Tenant shall pay to Landlord fifty percent (50%) of Sublet Profit on a monthly basis in arrears commencing thirty (30) days after the effective date of the sublease. Within thirty (30) days after the effective date of the sublease, Tenant shall submit to Landlord a statement containing a reasonably detailed calculation of any Sublet Profit derived from a subletting, certified as correct by an officer of Tenant. Upon Landlord's request, Tenant shall provide substantiation of Tenant's calculation of Sublet Profit, reasonably satisfactory to Landlord.

(d) In the case of any approved subletting, the subtenant shall deal only with Tenant, and Landlord shall have no privity with or direct obligations to such subtenant. Any attempted subletting or granting of occupancy rights by Tenant as to all or any portion of the Demised Premises not in accordance with this Section 7 shall, at Landlord's option (exercised by Landlord providing written notice thereof), be void of no force or effect.

(e) Notwithstanding any provision of this Lease to the contrary, Tenant shall be entitled, without Landlord's consent, but upon not less than ten (10) business days' notice, to permit Tenant's clients, business partners and affiliates with whom Tenant has a direct business relationship to use (for a period not to exceed 365 days) in the ordinary course of, and incidental to, Tenant's business, portions of the Demised Premises (which portions shall not exceed in the aggregate one thousand (1,000) rentable square feet of the Demised Premises in the aggregate) for general office use, provided (i) such use is permitted under, and in compliance with, the terms of this Lease and is related to Tenant's business in the Demised Premises, (ii) such user does not acquire any possessory interest in the Demised Premises or any portion thereof, (iii) such user complies with the terms of this Lease, including without limitation all the rules and regulations set forth herein, and (iv) the portion of the Demised Premises used pursuant to this Section 7(e) does not have a separate entrance and is not separated from the other portions of the



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Demised Premises by demising walls or similar partitions (any such user permitted to use the Demised Premises pursuant to the foregoing shall be referred to as a "Permitted User"). A Permitted User occupying any portion the Demised Premises pursuant to this Section 7(e) shall be deemed not to have sublet any such space for purposes of this Section 7. Nothing contained in this Lease or otherwise (including the provision of any services to the Demised Premises) shall be deemed to (a) create any landlord-tenant or other relationship between Landlord and any Permitted User, or (b) create any contractual liability or duty on the part of Landlord to any Permitted User. Any act, omission or default of any provision of this Lease caused by any such Permitted User shall be deemed an act, omission or default by Tenant.

8. Maintenance by Tenant of the Demised Premises. Tenant shall, at its sole cost, keep the Demised Premises (including without limitation, any plate glass or other non-Building standard entry doors) and the fixtures, improvements, equipment and finishes and any Alterations (defined below) therein in clean, safe and sanitary condition and in good order and repair (include all necessary replacements, alterations or additions) in a manner consistent with the quality of the Building, will take good care thereof and will suffer no waste or injury thereto. Maintenance and repair of such finishes and equipment, including kitchen appliances and fixtures, showers, or supplemental air-conditioning equipment, whether installed by Tenant or by Landlord on behalf of Tenant and whether installed at Tenant's or Landlord's expense, shall be the sole responsibility of Tenant, and Landlord shall have no obligation in connection therewith. All repairs made by Tenant shall be at least equal in quality and cost to the original work performed in constructing the Demised Premises and shall be made by Tenant in accordance with all laws, ordinances, and regulations, whether heretofore or hereinafter enacted and the requirements set forth in this Lease (including without limitation the provisions of Section 9 hereof, to the extent applicable). If Tenant does not do so promptly and adequately, then upon prior notice to Tenant and a reasonable opportunity to cure (not to exceed five (5) business days), Landlord may, but need no, make such repairs, and Tenant shall pay Landlord the cost thereof on demand as Additional Rent.

9. Alterations.

(a) Tenant shall not make or permit anyone to make any alterations, additions, substitutions, installations, changes or improvements, structural or otherwise, in or to the Demised Premises (including without limitation, any Tenant Work) or the rest of the Property ("**Alterations**") without the prior written consent of Landlord, except that the consent of Landlord shall not be required for any Alteration to the Demised Premises which is purely cosmetic or decorative and is not visible from the exterior of the Demised Premises (but Tenant shall be required to provide Landlord at least thirty (30) days notice with respect thereto). Notwithstanding the foregoing, Landlord's consent to any Alteration to the Demised Premises shall not be unreasonably withheld, conditioned or delayed, unless the proposed Alterations could, in Landlord's reasonable judgment (i) affect the structure or safety of the Building; (ii) adversely affect the electrical, plumbing or mechanical systems of the Building or the functioning thereof; (iii) be or become visible from the exterior of the Demised Premises; or (iv) adversely affect the operation of the Building or the provision of services or utilities to other tenants in the Building (each, a "Building Issue"). As a condition to granting its consent, Landlord may require Tenant to pay Landlord a reasonable fee to reimburse Landlord for overhead and administrative costs and expenses incurred in connection with the supervision by Landlord of Tenant's Alterations; provided, however, unless Landlord manages the Alteration, such fee shall not exceed \$5,000.00, plus the reasonable out-of-pocket costs, if any, incurred by Landlord in connection with any third party review or supervision of such Alteration that Landlord may reasonably require. All Alterations permitted by Landlord must conform to all rules, regulations and requirements of any governmental or public authority having jurisdiction over the Demised Premises and/or the Property, must conform harmoniously with the Building's design and interior decoration and must not require any changes to or modifications of any of the Building's structural components or mechanical, electrical, HVAC (hereinafter defined), plumbing or other systems. Any wiring, conduits, and/or cabling installed in the Demised Premises or any risers or any other location of the Building shall constitute an Alteration for purposes of this Lease and shall, at Landlord's election, be removed by Tenant, at Tenant's sole cost, prior to the expiration or earlier termination of the Term in accordance with Landlord's then current rules and procedures. In addition, all voice, data, video, audio and other cabling installed in the Building by Tenant or its contractor shall be (a) plenum rated and installing in accordance with all legal requirements, including without limitation the National Electrical Code; (b) labeled with the



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Tenant's name at the origination point, destination point and at reasonable intervals between such points, and (c) installed and routed in accordance with a routing plan reasonably acceptable to Landlord. As payments are made to contractors and vendors, Tenant agrees to obtain and deliver to Landlord written and unconditional waivers of mechanics' liens upon the Land and Building for all work, labor and services performed, and materials furnished, by Tenant's contractors and suppliers in connection with such work for which such contractor or vendor is being paid. Tenant will allow Landlord or its designated agent to inspect the work from time to time upon reasonable prior notice and at reasonable times during the period of construction of all Alterations. Tenant shall cause all Alterations to be made (i) in a good and workmanlike manner, (ii) in compliance with all applicable laws, regulations and other requirements of governmental authorities, (iii) according to the plans and specifications provided to and approved by Landlord and otherwise in compliance with the terms hereof, (iv) using new materials and installations, at least equal in quality to the original Building materials and installations, free from any defects or deficiencies, (v) in a manner that avoids interfering with or disturbing any other tenants, (vi) with due diligence, and (vii) in a manner that will not adversely affect any "LEED" certification, Energy Star rating or other "green agency" rating that Landlord may have obtained for the Building. Landlord may stop work on any Alterations if Landlord or its designated agent determines that the work is not being done in compliance with any of the requirements of this Lease. In addition, in the event any such work violates or is otherwise not in compliance with such requirements, Tenant will promptly correct the non-compliance. If Tenant fails to correct such problem(s) within a time period Landlord determines to be reasonable after notice to Tenant, then Landlord may, at its sole option, correct the problem(s), complete the Alterations, and Tenant will be liable for the costs of such action as Additional Rent.

(b) Upon completion of any Alterations, Tenant will deliver to Landlord complete CAD drawings of the Alterations. In addition, Tenant will furnish "as built" plans and specifications for all Alterations within a reasonable period of time after completion of the Alterations, and pay to Landlord or its designated agent a reasonable fee for updating the master reproducible Building blueprint to show the Alterations.

(c) It is understood and agreed by Landlord and Tenant that any Alterations shall be conducted on behalf of Tenant and not on behalf of Landlord and that Tenant shall be deemed to be the "owner" and not the "agent" of Landlord. If any Alteration (other than purely cosmetic or decorative Alterations to the Demised Premises) is made without the prior written consent of Landlord, Landlord may correct or remove the same, and Tenant shall be liable for any and all loss, damage, cost or expense (including, without limitation, reasonable attorneys' fees and all court costs) incurred by Landlord in the performance of this work.

(d) All Alterations (including without limitation any and all flooring, wall-to-wall carpet and wall covering) shall, at Landlord's election, immediately become the property of Landlord and shall remain upon and be surrendered with the Demised Premises as a part thereof at the end of the Term; provided, however, that Tenant shall have the right to remove, prior to the expiration or termination of the Term, all movable furniture, furnishings or equipment not affixed to or in the Demised Premises at the expense of Tenant. If and to the extent Landlord does not elect that any of the Alterations (including without limitation, any vaults, safes, file systems, raised floors, wiring and cabling or interior staircases between floors) remain upon and be surrendered with the Demised Premises at the expiration or termination of the Term (or Landlord otherwise requires that any of the Alterations be removed from the Demised Premises or any other part of the Property at the expiration or termination of the Term), Tenant shall, at its sole cost and expense, remove same, restore the affected area to the condition existing prior to the construction or installation of any such Alteration and repair any damage caused by such removal, and if Tenant fails to remove any such Alteration, to restore and repair the affected area or repair any damage caused by any such removal as provided above, Landlord may undertake such removal, restoration and repair at Tenant's expense and Tenant shall reimburse Landlord for the cost thereof, together with any and all damages (including, without limitation, attorneys' fees and all court costs) which Landlord may sustain by reason of such default by Tenant. Notwithstanding the foregoing, if at the time Tenant requests Landlord's approval of the installation of any Alteration (including any Tenant Work), Tenant specifically requests in writing that Landlord then elect to require that such Alteration (or Tenant Work) be removed from the Demised Premises or remain in the Demised Premises at the expiration or termination of the

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Term, Landlord shall make such election at the time it provides to Tenant notice of approval of such Alteration.

(e) If Landlord consents to Alterations by Tenant, Landlord shall have the right in its sole discretion to approve the plans and specifications for any Alterations and the contractors and subcontractors which Tenant proposes to use in connection with the Alterations, which approval shall not be unreasonably withheld, conditioned or delayed, unless Landlord reasonably determines that any Alterations shown on the plans and specifications may be or result in a Building Issue. Landlord's approval of such plans and specifications shall not constitute a warranty, covenant or assurance by Landlord that (i) any equipment or system shown thereon will have the features or perform the functions for which such equipment or system was designed, (ii) the plans and specifications satisfy applicable code requirements, (iii) the plans and specifications are sufficient to enable Landlord's contractor or Tenant's contractor (as applicable) to obtain a building permit for the Alterations shown thereon, or (iv) the Alterations described thereon will not interfere with, and/or otherwise adversely affect, base Building systems. Tenant shall be solely responsible for the ensuring that such Alteration (and related plans and specifications) comply with all Applicable Laws. Tenant, or its contractors and subcontractors, as Landlord may direct, shall provide such insurance, bonding and/or indemnifications of Landlord as Landlord may reasonably require and shall comply with any and all rules and regulations set forth in the Rules for Contractors attached hereto as **Exhibit E** and any and all other rules and regulations applicable to Alterations as may be promulgated by Landlord from time to time. Prior to undertaking any Alterations, Tenant shall furnish to Landlord certificates of insurance for worker's compensation insurance (covering all persons to be employed by Tenant and Tenant's contractors and subcontractors in connection with such Alterations), builder's all-risk insurance, and comprehensive commercial general liability insurance (including property damage coverage) in such form, with such companies, for such periods and in such amounts as Landlord may reasonably require, naming Landlord, its management agent and any mortgagee (hereinafter defined) as additional insureds.

10. Signs; Furnishings.

(a) No sign, advertisement or notice shall be inscribed, painted, affixed or displayed by Tenant on any part of the outside or the inside of the Building or within the Demised Premises if the same is visible from outside of the Demised Premises, and if any such sign, advertisement or notice is nevertheless exhibited by Tenant, Landlord may remove the same and Tenant shall be liable for any and all expenses (including, without limitation, reasonable attorneys' fees and all court costs) incurred by Landlord in such connection. A nameplate identifying Tenant shall be posted on the Building directory (or displayed electronically) and on the suite entry door of the Demised Premises by Landlord, in such place, size, color and style as are determined by Landlord, at Landlord's sole cost. Such nameplates shall conform harmoniously with the Building's design and interior decoration. Any additions or changes after the Lease Commencement Date to either the Building directory listing or the nameplate on the suite entry door for Tenant of the Demised Premises shall be made by Landlord at Landlord's reasonable discretion and at Tenant's sole cost. Landlord shall have the right to prohibit any advertisement of Tenant in, on or about the Building or naming the Building or its address which in Landlord's opinion tends to impair the reputation of the Building or its desirability as a high-quality building for offices for financial, insurance and other institutions of similar kind, and, upon written notice from Landlord, Tenant shall immediately refrain from and discontinue any such advertisement. Directory listing and/or signs for approved assignees or approved subtenants shall be at Landlord's sole discretion based on the availability of space.

(b) Landlord shall have the right to prescribe the weight and position of safes and other heavy equipment or fixtures. Any and all damage or injury to the Demised Premises or the rest of the Building caused by moving the property of Tenant into, in or out of the Demised Premises, or due to the same being on the Demised Premises, shall be repaired under Landlord's direction by Tenant, and at the sole cost of Tenant. All moving of furniture, equipment and other material within any public area of the Building shall be at such times and conducted in such manner as Landlord may reasonably require in the interest of all tenants within the Building.

11. Inspection. Tenant will permit Landlord, or its representative, upon reasonable prior notice (except in the case of an emergency or in the event of a default, when no such notice shall be required), to enter the Demised Premises or the Property at any reasonable time and from time to time, without

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charge to Landlord and without diminution of the Base Rent and Additional Rent payable by Tenant, to examine, inspect or protect or prevent damage to the Demised Premise or any part of the Property, to make such alterations and/or repairs as in the judgment of Landlord may be deemed necessary or desirable, or as any governmental agency may require, or to exhibit the same to prospective tenants (but only during the last 18 months of the Term), lenders or purchasers.

12. Insurance.


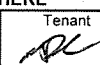
(a) Tenant will not conduct or permit to be conducted any activity, or place any equipment in or about the Demised Premises, which will, in any way, increase the rate of fire insurance or other insurance on the Building; and if any increase in the rate of fire insurance or other insurance is stated by any insurance company or by the applicable Insurance Rating Bureau to be due to any activity or equipment in or about the Demised Premises, such statement shall be conclusive evidence that the increase in such rate is due to such activity or equipment and, as a result thereof, Tenant shall be liable for such increase and shall reimburse Landlord therefor on demand.

(b) From and after the date hereof, Tenant shall purchase and maintain insurance with terms and coverages reasonably satisfactory to Landlord, and with such additional coverages and/or increases in limits as Landlord may from time to time reasonably request (but not more frequently than once every three years during the Term), but initially Tenant shall maintain the following coverages in the following amounts: (1) business income insurance in an amount sufficient to provide payment of Base Rent and Additional Rent for a period of at least one year, (2) worker's compensation insurance to the fullest extent required by applicable law, (3) commercial general liability insurance (including coverage for bodily injury, property damage and personal and advertising injury and broad form contractual liability coverage) in a minimum amounts of One Million Dollars (\$1,000,000.00) per occurrence and One Million Dollars (\$1,000,000.00) in the aggregate, (4) professional liability insurance in a minimum amounts of One Million Dollars (\$1,000,000.00) per occurrence and One Million Dollars (\$1,000,000.00) in the aggregate; and (5) umbrella (excess) liability insurance in the minimum amount of Three Million Dollars (\$3,000,000.00). Tenant shall also carry automobile liability insurance (covering owned, if any, non-owned and hired automobiles) in a minimum amount of One Million Dollars (\$1,000,000.00) per occurrence. All liability and automobile insurance of Tenant shall name Landlord, Landlord's managing agent, Landlord's mortgagee(s) and any other parties designated by Landlord as additional insureds. The liability insurance policy of Tenant shall preserve the right of one insured to collect under the policy for damage or injury caused by the other insured. Tenant shall not carry any deductible under any of its liability policies, without Landlord's written consent.

(c) Tenant shall carry "special causes of loss" (or its equivalent) property damage insurance (naming Landlord as a loss payee, as its interest may appear), including insurance for fire, water, sprinkler, and other casualty for the full replacement cost (including an agreed amount endorsement) of (i) all Tenant's furniture, fixtures and equipment, any personal property and any removable property in the Demised Premises, whether or not owned by Tenant, and (ii) all Tenant Work, Alterations and any other improvements now in or hereinafter installed in the Demised Premises regardless of whether installed by or on behalf of Landlord or Tenant or any other person. No deductible under such insurance shall be in excess of Five Thousand Dollars (\$5,000.00), without Landlord's written consent.

(d) Landlord shall, as part of Operating Costs, carry commercial general liability insurance and keep the Building (but not any of Tenant's furniture, fixtures, equipment or personal property or any removable property, Tenant Work, Alterations or any other improvements in the Demised Premises) insured against loss or damage caused by fire damage or other casualty, as any mortgagee of the Building may from time to time require (or provide such greater insurance coverage as Landlord may determine in its sole discretion).

(e) Landlord and Tenant agree that in the event the Demised Premises or the contents thereof are damaged or destroyed by fire or other casualty, the rights, if any, of either party against the other with respect to such damage or destruction are waived to the extent of the insurance proceeds paid or payable to the waiving party with respect thereto (or which would have been paid to the waiving party if the insurance required hereunder to be carried by the waiving party had been carried by the waiving party). For purposes of this Section 12(e), any deductible paid or payable by Tenant under its insurance

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policy shall be deemed insurance proceeds paid or payable to Tenant. All policies of fire and/or extended coverage or other insurance covering the Demised Premises or the contents thereof obtained by Landlord or Tenant shall contain a clause or endorsement providing in substance that (i) such insurance shall not be prejudiced if the insureds thereunder have waived in whole or in part the right of recovery from any person or persons prior to the date and time of loss or damage, if any, and (ii) the insurer waives any rights of subrogation against Landlord (in the case of Tenant's insurance policy) or Tenant (in the case of Landlord's insurance policy), as the case may be.

(f) All insurance policies carried by Tenant shall be written as primary policy coverage and not contributing with or in excess of any coverage which Landlord may carry. In addition, all insurance policies carried by Tenant shall be issued by a company or companies licensed to do business in the jurisdiction in which the Property is located and rated not lower than "Class A-VII", as rated in the most recent edition of the Alfred M. Best Company, Inc.'s Key Rating Guide for insurance companies and otherwise approved by Landlord. Certificates of insurance (using an ACORD Form 27, ACORD form 28 and ACORD Form 25-S and otherwise in a form satisfactory to Landlord) evidencing the effectiveness of the insurance coverage Tenant is required hereunder to maintain shall be delivered to Landlord at least annually (on or prior to commencement of each Lease Year) by Tenant, and within fifteen (15) days after request by Landlord, and each policy shall contain an endorsement that will prohibit its cancellation or material modification prior to the expiration of thirty (30) days after notice of such proposed cancellation or material modification to Landlord. Tenant shall be required to maintain the insurance required hereunder no later than the date that Tenant or any agent, employee or contractor of Tenant first has access to the Demised Premises or the Building. Any assignee of this Lease or subtenant of all or any part of the Demised Premises shall be required to carry the same insurance required of Tenant hereunder.

13. Indemnity.

(a) Except as may be the direct result of the intentionally wrongful or negligent acts or omissions of Landlord, and except as otherwise provided in Section 12(e) hereof, Tenant shall, and does hereby, indemnify, hold harmless and defend (with counsel reasonably satisfactory to Landlord) Landlord, its partners (and the partners of its partners), members, property managers, mortgagees, invitees and their officers, directors, agents and employees (collectively, the "Indemnified Parties"), from and against any loss, damage, liability, cost or expense (including, without limitation, reasonable attorneys' fees and all court costs) incurred by the Indemnified Parties and occasioned by or in any way related to or connected with (i) the making or removal of any Alterations or the use or occupancy of the Demised Premises or the Property by Tenant, its agents, employees, subtenants, licensees, contractors, invitees, and any other persons who gain access to the Demised Premises including, without limitation, any violation of any Applicable Laws, (ii) the negligence or the intentionally wrongful acts or omissions of Tenant, its agents, employees, subtenants, licensees, contractors and invitees, (iii) any default, breach or violation of this Lease by Tenant, its agents, employees, subtenants, licensees, contractors and invitees, and (iv) injury or death to individuals or damage to property sustained in or about the Demised Premises.

(b) Except as may be the result of the negligent or intentionally wrongful acts or omissions of Tenant, its employees or agents, and except as otherwise provided in Section 12(e) hereof, Landlord shall, and hereby does, indemnify, hold harmless and defend (with counsel reasonably satisfactory to Tenant) Tenant and its officers, directors, agents and employees (collectively, the "Tenant Indemnified Parties") against any and all claims, damages, liabilities, costs or expenses (including reasonable attorneys' fees) incurred by Tenant Indemnified Parties for damage to property or injury to person resulting from the gross negligence or willful misconduct of Landlord or any agent or employee of Landlord, in connection with the managing or operating of the Property. Notwithstanding anything contained in this Lease to the contrary, in no event shall Landlord be liable to Tenant on account of any claims for any lost business or profits or indirect or consequential losses or damages or any punitive damages.

14. Liability of Landlord.

(a) Except for injury to person or property damage directly caused by the intentionally wrongful acts or omissions of Landlord, Landlord shall not be liable to Tenant, its employees, agents, business invitees, licensees, customers, clients, family members, guests or trespassers for any damage,

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compensation or claim arising from (i) the repairing of any portion of the Building, (ii) any interruption in the use of the Demised Premises or the Property, (iii) accident or damage resulting from the use or operation (by Landlord, Tenant, or any other person or persons whatsoever) of elevators, escalators, or heating, cooling, electrical or plumbing equipment or apparatus, (iv) the termination of this Lease by reason of the destruction of the Demised Premises or a taking or sale in lieu thereof by eminent domain, (v) any fire, robbery, theft, criminal act and/or any other casualty, (vi) any leakage in any part of the Demised Premises or the rest of the Building, or from water, rain or snow that may leak into, or flow from, any part of the Demised Premises or the rest of the Building, or from drains, pipes or plumbing work in or about the Building, or (vii) any other cause whatsoever. Notwithstanding anything contained in this Lease to the contrary, in no event shall Landlord have any liability to Tenant on account of any claims for the interruption of or loss to Tenant's business or for any indirect damages or consequential losses.

(b) Except as provided in Sections 16 and 17, below, Tenant shall not be entitled to any abatement or diminution of Base Rent or Additional Rent as a result of any of the occurrences set forth in Section 14(a) hereof, nor shall the same release Tenant from its obligations hereunder or constitute an eviction. Notwithstanding any provisions in this Lease to the contrary, any goods, property or personal effects stored or placed by Tenant in or about the Demised Premises or the rest of the Building or the Property shall be at the sole risk of Tenant, and Landlord shall not be liable to Tenant for any loss or damage thereto.

(c) The employees of Landlord are prohibited from receiving any packages or other articles delivered to the Building for Tenant, and if any such employee receives any such package or articles, such employee shall be the agent of Tenant and not of Landlord. Landlord shall not be obligated to provide or maintain any security patrol, security system, access system (other than any electronic access system described in Section 16 hereof) or lobby host. However, if Landlord elects to provide any of the foregoing, Tenant agrees that Landlord shall not be responsible for the quality of such of the foregoing which may be provided hereunder or for damage or injury to Tenant, its employees, invitees or others due to the failure, action or inaction of either of same.

15. Tenant's Equipment. Tenant will not install or operate in the Demised Premises, without first obtaining the prior written consent of Landlord, any electrically operated equipment or other machinery, except standard office equipment ordinarily found in first-class office buildings in the metropolitan Washington, D.C. area that will not in Landlord's reasonable discretion, (i) affect the structure or safety of the Building or by itself, or with other equipment, exceed the floor load capacity, (ii) affect or necessitate a change to the electrical, plumbing, mechanical or other systems of the Building or the functioning thereof, (iii) be or become visible from the exterior of the Demised Premises, or (iv) interfere with the operation of the Building or the provision of services or utilities to other tenants in the Building. Landlord shall have the right to charge Tenant for the cost of its electricity consumption in excess of five (5) watts per square foot of Gross Rentable Area of the Demised Premises (exclusive of Building standard HVAC and lights) and for the cost of any additional wiring or other improvements to the Building as may be occasioned by or required as a result of any such excess use. Tenant shall not use or consume water other than for drinking, lavatory and toilet purposes, or in unusual quantities (of which fact Landlord shall reasonably judge), without first obtaining the prior written consent of Landlord. Tenant shall not install any other equipment of any kind or nature whatsoever (including, without limitation, electric space heaters and supplementary air-conditioning units) which will or may necessitate any changes, replacements or additions to, or in the use of, the water system, HVAC System, plumbing system or electrical system of the Demised Premises or the rest of the Building. Landlord may condition its consent to the installation or use of any equipment or machinery or to the consumption of excess utilities upon the payment by Tenant of Additional Rent in compensation for any excess consumption of utilities and for the cost of additional wiring, piping or other improvements to the Building as may be occasioned by the operation of said equipment or machinery or by said excess use of utilities. In the event of any excessive consumption of any utilities (including without limitation any excessive consumption beyond Building Hours), Landlord shall be entitled to require that Tenant install in the Demised Premises (at Tenant's cost and in a location approved by Landlord) meters or submeters to measure Tenant's utility consumption for the Demised Premises or for any specific equipment causing excess consumption, as Landlord shall require; in which case, Tenant shall maintain in good order and repair (and replace, if necessary) such meters or submeters. If separate meters are installed for measuring Tenant's use of any utilities, then charges for

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such utilities shall be paid directly by Tenant to the appropriate utility company. If submeters are installed for measuring Tenant's consumption of any utilities, Tenant shall pay the costs of the same to Landlord as Additional Rent, within fifteen (15) days of its receipt of a bill therefor based on such submeter readings. Business machines and mechanical equipment belonging to Tenant which cause noise or vibration that may be transmitted to the structure of the Building or to any space therein to such a degree as to be objectionable to Landlord or to any tenant in the Building shall be installed and maintained by Tenant, at Tenant's expense, on vibration eliminators or other devices sufficient to eliminate such noise and vibration, which fact Landlord shall reasonably judge. Whenever heat-generating machines or equipment are used in the Demised Premises, Landlord reserves the right to require Tenant to install supplementary air conditioning units in the Demised Premises and any cost associated therewith shall be paid by Tenant, including any cost of installation, operation and maintenance thereof.

16. Services and Utilities.

(a) It is agreed that, during the appropriate seasons of the year, Landlord will furnish air-conditioning and heating at least during the Building Hours set forth in the Basic Lease Information. Landlord's provision of air-conditioning and heating shall be based upon standard electrical energy requirements of not more than an average of five (5) watts per square foot of the Demised Premises (exclusive of Building standard HVAC and lights) and a human occupancy of not more than one person for each 125 square feet of Gross Rentable Area of the Demised Premises. Landlord shall have the right to operate the heating, ventilating, and air-conditioning ("HVAC") system ("HVAC System") in the most energy-efficient manner possible within the limits established in the Building design, and in accordance with any directive, policy or request of a governmental, quasi-governmental, public or other authority. As of the date of this Lease, the base Building HVAC System operates in accordance with current ASHRAE standards. Landlord may install a computerized energy-management system that operates the HVAC System in on-off cycles to control electrical demand and energy consumption. Extra hours of heating, ventilating, and air-conditioning (*i.e.*, all times other than during Building Hours) will be provided to Tenant upon Tenant's request with at least 24 hours' advance notice on a previous business day. Tenant will be charged Landlord's cost for such service outside of Building Hours, based upon Landlord's reasonable estimate of additional utility consumption and any other cost associated with such extra service. The current hourly charge for after-hours HVAC service is Fifty-Four Dollars (\$54.00) per hour per zone. As of the date of this Lease, the Demised Premises is served by one (1) zone of the base Building HVAC System.

(b) Landlord will provide reasonably adequate electricity as is normal and customary in office buildings of comparable age and location in the metropolitan Washington, D.C. area. Landlord shall provide and install all original fluorescent tubes for those lighting fixtures within the Demised Premises that are Building standard lighting fixtures. All replacement tubes for such Building standard lighting fixtures shall be provided and installed by Landlord as part of Operating Costs and all bulbs and tubes for other than Building standard lighting fixtures shall be provided and installed by Tenant at Tenant's sole cost and expense.

(c) Landlord shall furnish cold water from city water mains for drinking, lavatory and toilet purposes drawn through fixtures installed by Landlord, and hot water for lavatory purposes from the regular Building supply. Landlord will provide reasonably adequate lavatory supplies for public restrooms. Landlord will also provide exterior window cleaning service and char and janitorial service as is normal and customary in comparable first-class office buildings in the metropolitan Washington, D.C. area; provided, however, that char and janitorial service required for any non-Building standard improvements in the Demised Premises, such as glass partitions, wood flooring, kitchens, and private showers and restrooms, shall be subject to additional charges. Char and janitorial services shall be available Monday through Friday only, except Holidays.

(d) Landlord will also provide elevator service by means of automatically operated elevators at least during the Building Hours set forth in the Basic Lease Information. Landlord shall have the right to remove elevators from service as the same shall be required for moving freight, or for servicing or maintaining the elevators and/or the Building; provided, however, that at least one elevator will remain in service 24 hours per day, 365 days per year. Except in the case of an emergency, Tenant shall have access to the Demised Premises 24 hours per day, 365 days per year.

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(e) It is understood and agreed that Landlord shall not be liable for failure to furnish, or for delay or suspension in furnishing or providing, any of the utilities or services required to be furnished or provided by Landlord caused by breakdown, maintenance, repairs, strikes, scarcity of labor and/or materials, acts of God or from any other cause or reason whatsoever. Notwithstanding the forgoing, if due to reasons within the control of Landlord and not caused by Tenant, or any of its employees or agents or any event of force majeure, an interruption or stoppage of any services Landlord is required hereunder to provide to the Building shall occur and such interruption or stoppage shall continue for more than five (5) consecutive business days and shall render at least twenty-five percent (25%) of the Gross Rentable Area of the Demised Premises unusable and Tenant shall actually cease to conduct business in such portion of the Demised Premises during such period, then, provided that Tenant is not then in default under this Lease and Tenant delivers to Landlord written notice thereof promptly upon the occurrence thereof, the Base Rent and Tenant's Expense Share payable hereunder for such unusable portion of the Demised Premises shall be abated for the period beginning on the sixth (6th) consecutive business day of such failure (but in no event earlier than five (5) business days after receipt from Tenant of written notice that Tenant has experienced such an interruption or stoppage of services and Tenant has ceased the use thereof) and shall continue until the earlier of the date that (i) Tenant again uses such portion of the Demised Premises, or (ii) such portion of the Demised Premises is again usable. The foregoing provision shall not apply in the event such interruption of services is a result of a casualty, which shall governed by Section 17 hereof. If the Building equipment should cease to function properly, Landlord shall use due diligence to repair the same promptly.

(f) Landlord shall provide an electronic access system with computerized card access at the front entrance of the Building. Landlord shall not be responsible for the quality, action or inaction of the Building access system or for any damage or injury to Tenant, its employees, invitees or others, or their property, resulting from any failure, action or inaction of the Building access system.

(g) For so long as the Washington Sports Club located at 1345 F Street, N.W., Washington, D.C. ("WSP") is open to the public, Landlord shall pay for one (1) membership to WSP; provided, however, Landlord shall not be liable for any acts or omissions of any user. Notwithstanding anything to the contrary contained in this Section 16(g), in the event a fitness facility is located in the Building at any time hereafter, and Tenant's employees that work full-time at the Demised Premises are permitted to use such fitness facility at no cost to such employees, this Section 16(g) shall immediately terminate and be of no further force and effect.

(h) Tenant and Tenant's telecommunications companies ("Telecommunications Companies") shall have no right, without Landlord's prior written consent, of access to or within the Property for the installation or operation of any of Tenant's telecommunications systems for telecommunications within or from the Building, including but not limited to voice, video, data, and any other telecommunications services provided over wire, fiber optic, microwave, wireless, satellite and any other transmission systems. All work with respect to Tenant's telecommunications system shall be subject to the terms of this Lease governing Alterations by Tenant and at Landlord's option, shall require a separate license with the Telecommunications Companies on either (as determined by Landlord) Landlord's standard form or a form approved by Landlord. Landlord shall have the right to charge the Telecommunications Company a reasonable fee for the use of the Building in connection with Tenant's telecommunications system.

17. Damage by Fire or Casualty.

(a) In the event of damage to or destruction of the Demised Premises by fire or any other casualty, the base Building structures and systems in the Demised Premises shall, subject to the provisions of this Section 17, be promptly repaired and restored by Landlord at its own cost and expense, provided adequate insurance proceeds are available or would have been available to Landlord had Landlord maintained insurance required by this Lease. Due allowance, however, shall be given for the time required for adjustment and settlement of insurance claims, and for such other delays as may result from government restrictions, and controls on construction, if any, and for strikes, emergencies and other conditions beyond the reasonable control of Landlord. In addition, Tenant shall repair and restore, at Tenant's sole expense and in accordance with Sections 8 and 9 hereof, all improvements (including without limitation, the Tenant Work and Alterations in the Demised Premises), other than the base

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Building structural components in the Demised Premises, to their condition existing immediately prior to their damage or destruction. It is agreed that in any of the aforesaid events, this Lease shall continue in full force and effect, but if the damage or destruction is such so as to make the Demised Premises or any substantial part thereof untenable after the casualty and Tenant ceases to use such untenable area, then the Base Rent which Tenant is obligated to pay hereunder shall abate proportionately (based on the number of square feet rendered untenable) as of the first business day after the casualty until the earlier of the date that Tenant again uses such space or the date that the repair and/or restoration work which Landlord is obligated to perform hereunder has been substantially completed. If such damage or destruction shall result from the fault of Tenant, its agents, servants or invitees, Tenant shall not be entitled to any such abatement of Base Rent.

(b) If as a result of fire or other casualty more than one-half (½) of the Gross Office Rentable Area of the Building is rendered untenable, Landlord within sixty (60) days from the date of such fire or casualty may terminate this Lease by notice to Tenant, specifying an effective date, not less than twenty (20) nor more than forty (40) days after the giving of such notice, on which the Term shall expire as fully and completely as if such date were the date herein originally fixed for the expiration of the Term; provided, however, if the Demised Premises (or access to or services provided to the Demised Premises) are not affected by such fire or casualty, then such termination shall be effective seventy-five (75) days after giving such notice, provided that Landlord anticipates providing building standard services to other similarly situated tenants in the Building during such period. If Landlord terminates this Lease pursuant to this Section 17(b), Base Rent and Tenant's Expense Increase Share shall be apportioned as of the date of such termination.

(c) If the Demised Premises are damaged as a result of fire or other casualty and if the damage to the Demised Premises is so extensive that the Demised Premises are substantially untenable and the repair and/or restoration work which Landlord is obligated to perform hereunder cannot be substantially completed within one hundred eighty (180) days from the date such work is commenced (as determined by Landlord, in the exercise of its reasonable discretion), then Landlord shall provide to Tenant notice thereof and either Landlord or Tenant within thirty (30) days from the date of such notice may terminate this Lease by notice to the other, specifying an effective date, not less than twenty (20) nor more than forty (40) days after the giving of such notice, on which the Term shall expire as fully and completely as if such date were the date originally fixed for the expiration of the Term. If either Landlord or Tenant terminates this Lease pursuant to this Section 17(c), Base Rent and Tenant's Expense Increase Share shall be apportioned as of the date of such fire or other casualty.

(d) If the Demised Premises shall be rendered untenable to the extent of eighty percent (80%) or more by fire or other casualty during the last six months of the Term, Landlord or Tenant may terminate this Lease upon notice to the other party given within ninety (90) days after such fire or other casualty specifying an effective date, not less than twenty (20) days nor more than forty (40) days after the giving of such notice, on which the Term shall expire as fully and completely as if such date were the date originally fixed for the expiration of the Term. If either Landlord or Tenant terminates this Lease pursuant to this Section 17(d), Base Rent and Tenant's Expense Increase Share shall be apportioned as of the date of such fire or casualty.

(e) The proceeds payable under all fire and other hazard insurance policies maintained by Landlord on the Building shall belong to and be the property of Landlord, and Tenant shall not have any interest in such proceeds. Tenant agrees to look to its own fire and hazard insurance policies in the event of damage to any personal property or any furniture, fixtures, equipment, and/or improvements in the Demised Premises (including without limitation the Tenant Work and any other Alterations).

(f) No compensation, claim or diminution of Base Rent and Additional Rent will be allowed or paid by Landlord by reason of inconvenience, annoyance, or injury to business arising from the necessity of repairing the Demised Premises or any portion of the Building, however the necessity may occur. Further, notwithstanding the provisions of this Section 17, in the event Landlord becomes obligated to make repairs to the Demised Premises hereunder, such repairs shall be to only the base Building structures and systems located in the Demised Premises, and not to any other improvements (including without limitation, any Tenant Work, Alterations or any other improvements in the Demised Premises) or Tenant's furniture, fixtures and equipment, or Tenant's other personal property. At Tenant's

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request, and Landlord's agreement in its sole discretion, Landlord may repair and restore, on Tenant's behalf, all (or any portion) of the Tenant Work, Alterations or other improvements in Demised Premises that Tenant is required to repair and restore pursuant to Section 17(a) hereof, in which case, Tenant shall make all of its insurance proceeds available to Landlord for such use; provided, however, that in no event shall Landlord be required to spend more on any such repair or restoration than the amount of insurance proceeds Landlord actually receives from Tenant. Replacements of any Tenant Work, Alterations or other improvements in the Demised Premises by Tenant shall be of at least comparable quality to the items damaged or destroyed.

(g) This Lease shall be considered an express agreement governing any case of damage to or destruction of the Demised Premises or the Building by fire or other casualty; and any present or future Applicable Laws that purports to govern the rights of Landlord and Tenant in such circumstances in the absence of express agreement is hereby waived by the parties and shall have no application.

18. Damage Caused By Tenant. Tenant shall promptly notify Landlord of any injury or damage to the Demised Premises or the Building or of any condition in the Demised Premises or Building that could be a risk to the health or safety of any person. From and after the date hereof, all injury or damage to the Demised Premises or the Building caused by Tenant or its agents, employees and invitees shall be repaired by Tenant in accordance with Section 9 hereof, at Tenant's sole expense and at Landlord's direction and under Landlord's supervision; provided, however, if any such injury or damage is to any of the Building systems or structures, including without limitation the mechanical, electrical, structural, plumbing, elevator, sprinkler and/or life/safety systems, Tenant shall not be entitled to make any repairs thereto, but Landlord shall have the right in its sole discretion to make any such repairs and any cost so incurred by Landlord shall be paid by Tenant (in which event such cost shall become Additional Rent payable with the installment of Base Rent next becoming due under the terms of this Lease). In addition, if Tenant shall fail to make any repairs required to be made by Tenant under this Lease, and such failure shall continue for a reasonable period of time, after written notice from Landlord to Tenant (but no more than 5 business days), then Landlord shall have the right in its sole discretion to make such repairs or replacements, and any cost so incurred by Landlord shall be paid by Tenant, in which event such cost shall become Additional Rent payable with the installment of Base Rent next becoming due under the terms of this Lease. The Additional Rent referenced by the immediately preceding sentence shall bear interest from the date Landlord incurs the said costs to the date paid by Tenant at the Interest Rate per annum. This provision shall be construed as an additional remedy granted to Landlord and not in limitation of any other rights and remedies which Landlord has or may have in said circumstances.

19. Default of Tenant.

(a) (1) If (i) Tenant shall fail to pay in the manner provided in Section 3 hereof any installment of Base Rent or any Additional Rent (whether such Additional Rent is being paid on an installment or other basis) payable hereunder, or any other charge due hereunder (although no demand has been made therefor), or (ii) Tenant shall breach, violate or otherwise fail to perform any of the other conditions, covenants, agreements or obligations contained herein to be performed by Tenant (except with respect to the provisions of Section 21 or 30 hereof), or (iii) Tenant shall abandon the Demised Premises, or (iv) Tenant shall be liquidated or dissolved (if a corporation or other entity), or (v) Tenant shall fail to fulfill or perform any of its requirements under the provisions of Section 21 or 30 hereof, then such failure, breach, violation, occurrence or condition shall constitute a default of this Lease.

(2) If a default pursuant to Section 19(a)(1)(i) hereof continues for a period of five (5) days after written notice thereof to Tenant by Landlord; or a default pursuant to Section 19(a)(1)(ii) hereof shall continue for a period of twenty (20) days after written notice thereof to Tenant by Landlord, provided that if such a default under Section 19(a)(1)(ii) hereof will take longer than this twenty (20)-day period to cure, Tenant shall have such longer period (not to exceed sixty (60) days), as may be reasonably required to effectuate such cure, as long as such cure is commenced within such fifteen (15)-day period, and such cure is prosecuted diligently to completion; or, if a default pursuant to Sections 19(a)(1)(iii), (iv) or (v) shall occur, then and in any of said events Landlord at its sole option may either terminate this Lease and recover possession of the Demised Premises or recover possession of the Demised Premises without terminating this Lease (provided that Landlord may thereafter terminate this Lease at anytime prior to the expiration of the Term). Notwithstanding the foregoing cure periods, in the event that Tenant

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breaches the same covenant set forth in this Lease on more than two (2) occasions in any twelve (12) consecutive month period, or on more than three (3) occasions in any twenty-four (24) consecutive month period, then, notwithstanding the notice and cure periods set forth in this Section 19(a)(2), Tenant shall not be entitled to any notice or cure period for any subsequent breach of such covenant during the Term of this Lease and Landlord shall be entitled to exercise any remedies available to Landlord hereunder for a breach that is not cured within the notice and cure periods provided herein. Any notice to quit, or of Landlord's intention to re-enter, is hereby expressly waived, and Landlord may proceed to recover possession under and by virtue of the provisions of the laws of the jurisdiction in which the Property is located or by such other proceedings, including re-entry and possession, as may be applicable. Landlord shall have no obligation to make any payment to Tenant otherwise payable to Tenant hereunder while Tenant is in default of any term or condition under this Lease, and shall be entitled to apply any amount Tenant owes Landlord against any amount Landlord owns Landlord. If Landlord elects to terminate this Lease, the obligations herein contained on the part of Landlord to be performed shall cease without prejudice.

(b) Should Landlord terminate Tenant's right to possession of the Demised Premises (with or without terminating this Lease) before the expiration of the Term by reason of Tenant's default as hereinabove provided, Tenant shall thereafter have no right to possess or repossess the Demised Premises and the Demised Premises may be relet by Landlord, for such rental and upon such terms as Landlord is able to obtain, and, if the full Base Rent and Additional Rent herein provided shall not be realized by Landlord, Tenant shall be liable for all damages sustained by Landlord, including without limitation deficiency in rent, interest, attorneys' fees, other collection costs, all court costs and all other expenses (including, without limitation, leasing fees) of placing the Demised Premises in first-class rentable condition. Any damage or loss sustained by Landlord may be recovered by Landlord, at Landlord's option, at the time of the reletting, or in separate actions, from time to time, as said damage shall have been made more easily ascertainable by successive relettings, or, at Landlord's option, may be deferred until the expiration of the Term, in which event the cause of action shall not be deemed to have accrued until the Lease Expiration Date. If Landlord terminates Tenant's right of possession of the Demised Premises and Tenant requests in writing that Landlord mitigate its damages resulting from Tenant's default, then Landlord agrees to use commercially reasonable efforts to mitigate any damages that Landlord may suffer as a result of any default by Tenant hereunder, which commercially reasonable efforts may include Landlord undertaking to lease the Demised Premises to another tenant (a "Substitute Tenant"); provided, however, notwithstanding anything contained herein to the contrary (i) Landlord shall have no obligation to solicit or entertain negotiations with any other prospective tenants for the Demised Premises until Landlord obtains full and complete possession of the Demised Premises; (ii) Landlord shall not be obligated to offer the Demised Premises to a prospective tenant when other premises in the Building suitable for that prospective tenant's use are (or soon will be) available; (iii) Landlord shall not be obligated to lease the Demised Premises to a Substitute Tenant for a rental less than the current fair market rental then prevailing for similar office uses in comparable buildings in the same market area as the Building, nor shall Landlord be obligated to enter into a new lease under terms and conditions that are unacceptable to Landlord under Landlord's then current leasing policies for comparable space in the Building as determined by Landlord in its good faith judgment; (iv) Landlord shall not be obligated to enter into a lease with any proposed tenant whose use would: (1) violate any restriction, covenant or requirement contained in the lease of another tenant of the Building; (2) adversely affect the reputation of the Building; or (3) be incompatible with the operation of the Building as a first class building; and (v) Landlord shall not be obligated to enter into a lease with any proposed Substitute Tenant which does not have, in Landlord's reasonable opinion, sufficient financial resources or operating experience to operate the Demised Premises in a first class manner.

(c) If Landlord terminates this Lease pursuant to this Section 19, Landlord shall have the right at any time, at its option, to require Tenant to pay to Landlord, on demand as liquidated and agreed final damages in lieu of Tenant's liability under Section 19(b) hereof, interest, reasonable attorneys' fees, and other collection costs, all court costs and all other expenses (including, without limitation, leasing fees) of placing the Demised Premises in first-class rentable condition, the unamortized cost of any Tenant Work Allowance (as defined in the Basic Lease Information) and the amount of any waiver of Rent, plus any unpaid Rent which is due and owing at the time of termination, plus an amount equal to

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the present value (discounted at the Discount Rate, hereinafter defined) of the total amount of Rent which would have been payable from the date of such termination to the Lease Expiration Date, less the present value (discounted at the Discount Rate, hereinafter defined) of the amount of rent received by Landlord from a reletting of the Demised Premises for the remainder of the Term (or the amount of Rent that would have been received if Landlord were to take reasonable steps to mitigate its damages hereunder, net of all expenses and all vacancy periods reasonably projected by Landlord to be incurred in connection therewith). The "**Discount Rate**" shall mean the interest rate payable on a newly issued United States treasury bond with a maturity date that is as close as possible to the date that the Lease would have expired. If the Demised Premises shall have been relet for all or part of the remaining balance of the Term by Landlord after a default but before presentation of proof of such damages, the amount of rent reserved upon such reletting, absent proof to the contrary, shall be deemed to be the amount that Landlord would have received for the Demised Premises for purposes of the foregoing determination of damages.



(d) If a default by Tenant shall have occurred (beyond any notice and cure period set forth in Section 19(a)(2) hereof), then notwithstanding anything contained herein to the contrary, Landlord shall not be required to provide Tenant notice prior to entering the Demised Premises and, to the extent permitted by Applicable Law, Landlord shall have the right, without notice to Tenant, to change or re-key all locks to entrances to the Demised Premises, and Landlord shall have no obligation to give Tenant notice thereof or to provide Tenant with a key to the Demised Premises.

(e) In the event of any default or threatened default by Tenant or any persons claiming through Tenant of any of the provisions contained in this Lease, the same shall be deemed to cause irreparable harm. Landlord shall be entitled to enjoin such default or threatened default and shall have the right to invoke any right or remedy allowed at law, in equity or otherwise as if re-entry, summary proceedings or other specific remedies were not provided for in this Lease and without the necessity of proving irreparable harm or the unavailability or inadequacy of any legal remedy.

(f) Without limiting any of the foregoing remedies of Landlord and whether or not Tenant is in default of this Lease, if Tenant shall vacate the Demised Premises for more than sixty (60) days, then Landlord may (but shall not be required to) make (upon 10 days prior notice), at Tenant's sole cost, such alterations to the Demised Premises (including without limitation, the suite entry area of the Demised Premises), and take other action as Landlord reasonably determines appropriate to minimize risks of damage to the Building and any other adverse effect the vacant Demised Premises may have on limiting access to the Demised Premises or the aesthetics of the floor on which the Demised Premises are located, which alterations may include without limitation, locking-off the elevator to any floor occupied entirely by Tenant and/or the replacement of any glass suite entry area in the Demised Premises with Building standard wood doors and any conforming replacements of any other glass portion of the suite entry area.

(g) All rights and remedies of Landlord under this Lease shall be cumulative and shall not be exclusive of any other rights and remedies available to Landlord at law or in equity. In addition to the foregoing, and without regard to whether this Lease has been terminated, Tenant shall pay to Landlord all costs, including without limitation reasonable attorneys' fees, court costs and other disbursements, incurred by Landlord in connection with enforcing any provision of this Lease, whether or not any action or lawsuit is actually instituted by Landlord. Should either party institute any action or proceeding to enforce or interpret this Lease or any provision hereof, for damages by reason of any alleged breach of this Lease or of any provision hereof, or for a declaration of rights hereunder, the prevailing party (as determined by the applicable court pursuant to any non-appealable or un-appealed judgment) in any such action or proceeding shall be awarded from the other party all costs and expenses, including, without limitation, attorneys' and other fees, reasonably incurred in good faith by the prevailing party in connection with such action or proceeding.

20. Waiver. If under the provisions hereof Landlord shall institute proceedings and a compromise or settlement thereof shall be made, the same shall not constitute a waiver of any covenant herein contained nor of any of Landlord's rights hereunder except as expressly set forth in such compromise or settlement. No waiver by Landlord of any breach of any covenant, condition or agreement herein contained shall operate as a waiver of such covenant, condition or agreement itself, or of any subsequent breach thereof. No payment by Tenant or receipt by Landlord of a lesser amount than the

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monthly installment of Base Rent or any Additional Rent shall be deemed to be other than on account of the earliest stipulated Base Rent and Additional Rent nor shall any endorsement or statement on any check or letter accompanying a check for payment of any Base Rent or Additional Rent be deemed an accord and satisfaction, and Landlord may accept such check or payment without prejudice to Landlord's right to recover the balance of such Base Rent or Additional Rent or to pursue any other remedy provided in this Lease. No re-entry by Landlord, and no acceptance by Landlord of keys from Tenant shall be considered an acceptance of a surrender of this Lease. Tenant hereby waives any right of redemption Tenant may otherwise enjoy under applicable law.

21. Subordination and Attornment. This Lease is subject and subordinate to the lien of all and any mortgages (which term "**mortgages**" shall include both construction and permanent financing and shall include deeds of trust and similar security instruments) which may now or hereafter encumber or otherwise affect the Land and/or Building, or Landlord's interest therein, and to all and any renewals, extensions, modifications, recastings or refinancings thereof, and to any current or future ground lease of the Land. In confirmation of such subordination, Tenant shall, within ten (10) business days of Landlord's request, promptly execute any requisite or appropriate subordination or other document, but no further act by Tenant is required to effectuate the foregoing subordination or the attornment specified herein, the provisions of this Section 21 being agreed by Landlord and Tenant to be self-operative. Tenant agrees that in the event that any proceedings are brought for the foreclosure (or deed in lieu thereof) of any such mortgage or the termination of any ground lease, at the request of Landlord or Landlord's successor in interest, Tenant shall attorn to the purchaser at such foreclosure sale or the landlord under the ground lease (or lessee under any new underlying lease), and recognize such purchaser or new landlord as the landlord under this Lease, and Tenant waives the provision of any statute or rule of law, now or hereafter in effect, which may give or purport to give Tenant any right to terminate or otherwise adversely affect this Lease and the obligations of Tenant hereunder in the event that any such foreclosure proceeding is prosecuted or completed or in the event any ground lease is terminated. In addition, the purchaser or other successor in interest to Landlord shall not be liable for any act or omission of Landlord occurring before such purchaser or other successor succeeds to Landlord's interest herein, nor be subject to any offset or defense accruing before such purchaser or other successor succeeds to Landlord's interest herein, nor be bound by any prepayment of more than one monthly installment of Base Rent and Tenant's Expense Increase Share paid to Landlord prior to such purchaser or other successor succeeds to Landlord's interest herein. Notwithstanding the foregoing, Tenant agrees that the holders of any such mortgages or the ground lessor (each a "**mortgagee**" and collectively, "**mortgagees**") shall have the right to make this Lease superior to the lien of such mortgage or ground lease, by the filing of subordination statements or otherwise, and Tenant hereby consents to any such filing. Upon written request from Tenant in each instance, Landlord shall exercise reasonable efforts to obtain a subordination, non-disturbance and attornment agreement for Tenant from any current or future holder of a mortgage encumbering the Land and/or the Building ("**mortgagee**") in such mortgagee's customary form.

22. Condemnation.

(a) If all or substantially all of the Demised Premises shall be taken or condemned by any governmental, quasi-governmental, public or other authority for any public or quasi-public use or purpose (including sale under threat of such a taking), herein referred to as a "**Taking**," then the Term shall cease and terminate as of the date of the Taking, and all Base Rent and Additional Rent shall be abated as of such date. If less than substantially all of the Demised Premises is the subject of a Taking, the Base Rent and Additional Rent shall be equitably adjusted as of the date of the Taking and this Lease shall otherwise continue in full force and effect. Notwithstanding the foregoing, in the event of a Taking of so substantial a part of the Building that Landlord concludes, in its reasonable discretion, that it is impracticable to continue to operate the Building, then Landlord, at its option, shall have the right to terminate this Lease by giving Tenant termination notice specifying a date not earlier than thirty (30) days after the date of such notice as of which this Lease will terminate; provided, however, if the Demised Premises (or access to or services provided to the Demised Premises) are not affected by such condemnation, then such termination shall be effective seventy-five (75) days after giving such notice, provided that Landlord anticipates providing building standard services to other similarly situated tenants in the Building during such period.

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(b) Tenant shall have no claim against Landlord (or otherwise) for any portion of the amount that may be awarded as damages as a result of any Taking or for the value of any unexpired Term; provided, however, that Tenant may assert any claim that it may have against the condemning authority for compensation for any fixtures owned by Tenant and for any relocation expense compensable by statute, and receive such award therefor as may be allowed in the condemnation proceedings, if such award shall be made in addition to and stated separately from the award made for the Land and the Building or the part thereof so taken.

(c) This Lease shall be considered an express agreement governing any case of condemnation of the Demised Premises, the Building, or the Property; and any present or future Applicable Law that purports to govern the rights of Landlord and Tenant in such circumstances in the absence of express agreement is hereby waived by the parties and shall have no application.

23. Rules and Regulations. Tenant, its agents and employees shall abide by and observe the rules and regulations attached hereto as **Exhibit C**, and such other rules or regulations as may be promulgated from time to time by Landlord, with a copy sent to Tenant, for the operation and maintenance of the Building. Nothing contained in this Lease shall be construed to impose upon Landlord any duty or obligation to enforce such rules and regulations, or the terms, conditions or covenants contained in any other lease, as against any other tenant, and Landlord shall not be liable to Tenant for violation of the same by any other tenant, its employees, agents, business invitees, licensees, customers, family members or guests. Landlord shall not unreasonably discriminate against Tenant in the enforcement of the rules and regulations. In the event of any conflict between the rules and regulations and the terms and conditions of this Lease, the terms and conditions of this Lease shall control.



24. Covenant of Quiet Enjoyment. Landlord covenants that it has the right to make this Lease for the Term, and that if Tenant shall pay the Base Rent and Additional Rent and perform all of the covenants, terms and conditions of this Lease to be performed by Tenant, Tenant shall, except as otherwise provided in this Lease, during the Term, freely, peaceably and quietly occupy and enjoy the full possession of the Demised Premises without molestation or hindrance by Landlord or any party claiming through or under Landlord.

25. Sale or Transfer. In the event of any sale or transfer by the then landlord hereunder of the Building, the landlord whose interest is thus sold or transferred (the "**Selling Landlord**") shall be and hereby is completely released and forever discharged from and in respect of all covenants, obligations and liability as Landlord hereunder accruing after the date of such sale or transfer and is further forever discharged from the obligation to return any security deposit to Tenant, provided that the Selling Landlord has transferred such security deposit to its assignee.

26. No Partnership. Nothing contained in this Lease shall be deemed or construed to create a partnership or joint venture of or between Landlord and Tenant, or to create any other relationship between the parties hereto other than that of landlord and tenant.

27. No Representations by Landlord. Neither Landlord nor any agent or employee of Landlord has made any representations or promises with respect to the Demised Premises or the rest of the Property except as herein expressly set forth, and no rights, privileges, easements or licenses are acquired by Tenant except as herein expressly set forth. This Lease shall not be binding on the parties until and unless this Lease is fully executed and delivered by the parties hereto.

28. Brokers. Landlord shall pay the commission payable to the Broker identified in the Basic Lease Information pursuant to a separate agreement between the Broker and Landlord. Landlord and Tenant each represent and warrant one to the other that if either has engaged any broker or agent (other than the Broker) in carrying on the negotiations relating to this Lease, it will pay any brokerage commission payable to said broker or agent. Tenant shall and does hereby indemnify, hold harmless and defend Landlord from and against any and all claims, loss, damage, cost or expense (including, without limitation, attorneys' fees and all court costs) arising out of any breach of the foregoing representation and warranty by Tenant or any purported or actual dealings by Tenant and any broker or agent other than the Broker. Any representation or statement by a leasing company or other third party (or employee thereof) engaged by Landlord as an independent contractor which is made with regard to the Demised Premises or to the rest of the Building or the Property shall not be binding upon Landlord nor serve as a modification of this



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Lease and Landlord shall have no liability therefor, except to the extent such representation is also contained herein.

29. Notices. All notices or other communications hereunder shall be in writing and shall be deemed duly given if delivered by hand, or by a nationally recognized delivery service providing receipt evidencing such delivery, or by facsimile transmission the receipt of which is confirmed, or by certified or registered mail return receipt requested, first-class, postage prepaid, to the Address for Notices set forth in the Basic Lease Information unless notice of a change of address is given in writing pursuant to this Section 29. Notice shall be deemed to have been given upon receipt or at the time delivery is refused. In the event that the Basic Lease Information provides (or Tenant otherwise designates in writing in accordance with this Section 29) that more than one (1) person or address receive notices on Tenant's behalf hereunder, Landlord shall use commercially reasonable efforts to send such notices to all requested parties; however, it shall not be a condition to the effectiveness of any notice that more than one (1) person or address receive such notices.

30. Estoppel Certificates. Tenant agrees that, within ten (10) business days after Tenant receives written notice from Landlord, from time to time, Tenant shall execute, acknowledge and deliver to Landlord, at no cost to Landlord, a statement in writing (i) certifying that this Lease is unmodified and in full force and effect (or if there have been modifications, that this Lease is in full force and effect as modified and stating the modifications), (ii) stating the dates to which the rentals and other charges hereunder have been paid by Tenant, (iii) stating whether or not to the actual knowledge of Tenant, Landlord has failed to fulfill any of its obligations under this Lease, and, if so, specifying each such failure of which Tenant may have knowledge, (iv) stating that Tenant shall give written notice to Landlord's mortgagee of any failure by Landlord to fulfill any of its obligations under this Lease, (v) stating the address to which notices to Tenant should be sent, and (vi) stating that Tenant has accepted the Demised Premises and the improvements therein, and (vii) providing any other such information relating to this Lease that Landlord reasonably requests. Any such statement delivered pursuant hereto may be relied upon by any owner of the Building, any prospective purchaser of the Building, any mortgagee or prospective mortgagee of the Building or of Landlord's interest, or any prospective assignee of any such mortgage. Tenant acknowledges and agrees that compliance by Tenant with the requirements of this Section 30 is necessary for Landlord to efficiently manage the financial and other aspects of owning and operating the Property (including without limitation, facilitating the financing, refinancing and/or sale of the Property, any part thereof or any interest therein) and that any breach or other violation of the provisions of this Section 30 will result in material damages to Landlord (including without limitation, any damages to Landlord in connection with its financing, refinancing or sale of the Property, any part thereof or any interest therein that may result from any such breach or violation). Any breach or other violation of any requirement of this Section 30 shall be deemed a default hereunder, entitling Landlord (after providing Tenant and one other party entitled to a copy of such notice pursuant the Basic Lease Information with notice thereof (which notice shall must reference in bold and capitalized letters the provisions hereof) and three (3) business days thereafter within which to cure such default as set forth in Section 19(a)(2) hereof) to immediately undertake an action for the damages resulting therefrom (including without limitation any and all consequential, direct and/or indirect damages) and pursue any and all other remedies available to Landlord on account of such default, including any and all remedies available under this Lease or at law or equity. If Landlord requires that an estoppel certificate be delivered to Landlord more than once in any calendar year, unless Tenant is in default or such estoppel is required by a lender, potential lender, purchaser or potential purchaser in connection with a financing or potential financing or sale or potential sale of the Building or any interest therein or in Landlord, then Landlord shall reimburse Tenant for any attorneys' fees Tenant incurs in connection therewith, not to exceed \$500.00 for any such estoppel certificate.

31. Surrender; Holding Over. At the expiration or other termination of the Term, Tenant shall surrender and deliver the Demised Premises and all keys, locks and fixtures and improvements thereto (except only Tenant's personal property) in good order, repair and condition, as the same are now or shall be at the Lease Commencement Date, except for ordinary wear and tear and damage by casualty not required to be insured for and/or repaired by Tenant hereunder. Upon the expiration or other termination of the Term, Tenant shall remove the personal property of Tenant, any of its subtenants and any other persons or entities claiming under or through Tenant. Any personal property belonging to Tenant or any



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other person which is left in the Demised Premises after the Term shall be deemed to have been abandoned and shall be deemed to be property of Landlord; in which case, Landlord may retain such personal property or may dispose of same at the cost of Tenant (including selling such property or storing same in a warehouse or elsewhere), and Tenant shall promptly upon demand reimburse Landlord for any expenses incurred by Landlord in connection therewith, including reasonable attorneys' fees. Landlord shall not be liable for trespass, conversion, negligence or in any other way liable in connection with such property. Tenant agrees that it will not occupy or retain or allow occupancy or retention by any subtenant of possession of the Demised Premises at any time after the expiration or other termination of the Term, without the prior written consent of Landlord. In the event that Tenant shall hold over after the expiration or other termination of the Term without Landlord's prior written consent, Landlord shall have the right to regain possession of the Demised Premises by any legal process in force at such time. It will be conclusively presumed that the value to Tenant of remaining in possession of the Demised Premises after the expiration or termination of the Term, and the loss or damage that Landlord will suffer as a result thereof, far exceed the Base Rent and Additional Rent that would have been payable had the Term continued during the holdover period. In the event Tenant continues to occupy the Demised Premises after the expiration or termination of the Term, Tenant shall then be liable to pay to Landlord an amount equal to 150% of the monthly installments of Base Rent being paid immediately prior to the Lease Expiration Date, plus all Additional Rent and any other charges paid on an installment basis, for each month or part of a month that Tenant occupies the Demised Premises after the date of expiration or other termination of the Term, plus any other Additional Rent or charges due, attorneys' fees, costs, and expenses incurred by Landlord in regaining possession of the Demised Premises and/or to recover the foregoing amounts. Such liquidated damages for the first calendar month (or part thereof) during the holdover period shall be due and payable on the day immediately following the expiration of the Term, and for each calendar month thereafter during the holdover period, such liquidated damages shall be due and payable on the first day of such calendar month. If the holdover period ends on a date other than the last day of a calendar month, such liquidated damages for the entire calendar month in which the holdover period ends shall be deemed earned by Landlord as of the first day of such month, and Tenant shall not be entitled to a refund or reduction of Rent for any such partial month. Holdover occupancy by Tenant shall be subject to all of the terms, covenants, and conditions of this Lease. Tenant acknowledges and agrees that Landlord may undertake a major renovation or redevelopment of the Property (including the Building) and/or lease the Demised Premises (in whole, in part, or as a part of a larger portion of the Building) to another tenant immediately after the expiration or other termination of the Term. In any such event, any breach or other violation of the provisions of this Section 31 may result in material damages to Landlord, including without limitation, any damages to Landlord in connection with delaying any renovation and redevelopment of the Property or in connection with any reletting of the Demised Premises and/or other portions of the Building. Tenant agrees to indemnify, hold harmless and defend Landlord for all damages, losses, expenses and costs (including reasonable attorneys' fees and court costs) that Landlord may suffer as a result of Tenant's holdover use and occupancy of the Demised Premises.

32. Right of Landlord to Cure Tenant's Default. If Tenant defaults in the making of any payment or in the doing of any act herein required to be performed by Tenant (other than the payment of Base Rent and Additional Rent), and such failure is not cured after Landlord provides Tenant with twenty (20) days written notice thereof (except in the case of any emergency or if such default materially affects the structural elements of the Building, the Base building systems or other tenants of the Building, in which case no prior notice shall be required), then Landlord may, but shall not be required to, make such payment or do such act, and the amount of the expense thereof, if made or done by Landlord, with interest thereon at the Interest Rate per annum from the date paid by Landlord, shall be paid by Tenant to Landlord and shall constitute Additional Rent hereunder due and payable with the next monthly installment of Base Rent; but the making of such payment or the doing of such act by Landlord shall not operate to cure such default or to estop Landlord from the pursuit of any remedy to which Landlord would otherwise be entitled.

33. Intentionally Omitted.

34. Benefit and Burden. Subject to the provisions of Sections 6 and 7 hereof, the provisions of this Lease shall be binding upon, and shall inure to the benefit of, the parties hereto and each of their

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respective representatives, successors and assigns. Landlord may freely and fully transfer, assign, and/or convey its interest hereunder.

35. Security Deposit.

(a) **Security Deposit Amount.** Simultaneously with Tenant's execution of this Lease, Tenant shall deposit with Landlord an amount equal to the Security Deposit Amount as a security deposit.

(b) **Security.** Such security deposit shall be considered as security for the payment and performance by Tenant of all of Tenant's obligations, covenants, conditions and agreements under this Lease.



(c) **Form.** Such security deposit may, at Tenant's option, be deposited by Tenant with Landlord in the form of cash or Tenant shall deliver to Landlord an irrevocable standby letter of credit (the "Letter of Credit") in a face amount equal to the Security Deposit Amount. If Tenant elects to provide the Letter of Credit as such security deposit, Tenant shall maintain the Letter of Credit in full force and effect throughout the Term and until sixty (60) days after the end of the calendar year in which the Lease Expiration Date occurs, and shall cause the Letter of Credit to be renewed or replaced not less than sixty (60) days prior to its expiry date. The Letter of Credit shall (i) be unconditional, irrevocable, transferable, payable to Landlord on sight at a metropolitan Washington, D.C. area financial institution, in partial or full draws, (ii) be substantially in the form attached hereto and incorporated herein as Exhibit F, and otherwise be in form and content reasonably acceptable to Landlord, (iii) shall be issued by a financial institution reasonably acceptable to Tenant and Landlord, and (iv) contain an "evergreen" provision which provides that it is automatically renewed on an annual basis unless the issuer delivers sixty (60) days' prior written notice of cancellation to Landlord and Tenant. Any and all fees or costs charged by the issuer in connection with the Letter of Credit shall be paid by Tenant.

(d) **Right to Draw.**

1. If the security deposit is in the form of cash, in the event of any default by Tenant hereunder beyond any applicable notice or cure period, Landlord shall have the right, but shall not be obligated, to apply all or any portion of the security deposit to compensate Landlord (whether in whole or in part) for such default, in which event, within fifteen (15) days thereafter, Tenant shall be obligated to deposit with Landlord the amount necessary to restore the balance of the security deposit to an amount equal to the then-applicable Security Deposit Amount; provided, however, neither the application of the security deposit as set forth above nor the payment by Tenant to restore such security deposit shall operate to cure such default or to estop Landlord from pursuing any remedy to which Landlord would otherwise be entitled, unless and until Tenant has fully compensated Landlord for any damage resulting from such default and Tenant has restored any security deposit and otherwise complied with the terms hereof.

2. If the security deposit is in the form of a Letter of Credit, in the event of any default by Tenant hereunder beyond any applicable notice or cure period, Landlord shall have the right to draw upon the Letter of Credit in whole or in part and apply the proceeds thereof as may be necessary to compensate Landlord for such default, and Tenant, within fifteen (15) days after Landlord delivers written demand therefor to Tenant, shall forthwith restore the Letter of Credit to a face amount equal to the then-applicable Security Deposit Amount; provided, however, neither the application of the security deposit as set forth above nor the restoration by Tenant of such security deposit shall operate to cure such default or to estop Landlord from pursuing any remedy to which Landlord would otherwise be entitled, unless and until Tenant has fully compensated Landlord for any damage resulting from such default and Tenant has restored any security deposit and otherwise complied with the terms hereof. Should Landlord elect to draw the full amount of the Letter of Credit upon a default by Tenant, Tenant expressly waives any right it might otherwise have to prevent Landlord from drawing on the Letter of Credit and agrees that an action for damages and not injunctive or other equitable relief shall be Tenant's sole remedy in the event Tenant disputes Landlord's claim to any such amounts.

3. Landlord shall also have the right to draw upon the Letter of Credit in any of the following circumstances (which circumstances described in items (i) and (ii) below shall apply to all issuers, including without limitation the initial issuer): (i), if the total assets of the issuer of the Letter of

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Credit are at any time less than Three Billion Dollars (\$3,000,000,000.00), or such issuer has a Standard & Poor's commercial paper rating of less than A-1 (provided if at any time the current Standard & Poor's commercial paper rating system is no longer in existence, a comparable rating of a comparable commercial paper rating system from a comparable company shall be selected by Landlord, in its reasonable discretion, for purposes of this Section 35) and Tenant fails to deliver to Landlord a replacement Letter of Credit complying with the terms of this Lease within thirty (30) days of request therefor from Landlord, (ii) if the issuer of the Letter of Credit shall enter into any supervisory agreement with any governmental authority, or the issuer of the Letter of Credit shall fail to meet any capital requirements imposed by applicable law, and Tenant fails to deliver to Landlord a replacement Letter of Credit complying with the terms of this Lease within thirty (30) days of request therefor from Landlord, or (iii) if Tenant fails to provide Landlord with any renewal or replacement Letter of Credit complying with the terms of this Lease at least sixty (60) days prior to expiration of the then-current Letter of Credit. In the event the Letter of Credit is drawn upon due solely to the circumstances described in the foregoing clauses (i), (ii) or (iii), the amount drawn shall be held by Landlord without interest as a security deposit to be otherwise retained, expended or disbursed by Landlord for any amounts or sums due under this Lease to which the proceeds of the Letter of Credit could have been applied pursuant to this Lease, and Tenant shall be liable to Landlord for restoration, in cash or Letter of Credit complying with the terms of this Lease, of any amount so expended to the same extent as set forth in this Section 35.

(e) Right to Pledge or Assign. Landlord shall have the right to pledge or assign its interest in the security deposit and proceeds thereof to any lender holding a security interest in the Demised Premises. In the event of any sale or transfer of Landlord's interest in the Building, Landlord shall transfer the security deposit to such purchaser or transferee, in which event such purchaser or transferee shall hold, use and apply the security deposit and proceeds thereof in accordance with the covenants, terms and conditions of this Lease. Tenant shall look solely to the new landlord for the return of the security deposit and Landlord shall thereupon be released from all liability to Tenant for the return of such security deposit, provided that the Landlord has transferred such security deposit to such purchaser or transferee and such purchaser or transferee has actually received such security deposit. No mortgagee or other purchaser of any or all of the Building at any foreclosure proceeding brought under the provisions of any mortgage shall (regardless of whether the Lease is at the time in question subordinated to the lien of any mortgage) be liable to Tenant or any other person for any or all of such sums or the return of any security deposit (or any other or additional security deposit or other payment made by Tenant under the provisions of this Lease), unless Landlord has actually delivered the security deposit, or proceeds thereof, to such mortgagee or purchaser, and in no event shall any mortgagee at any such foreclosure proceedings have a claim against the security deposit or the proceeds thereof to apply same to cure any default of Landlord under the mortgage documents which are the subject of the foreclosure proceedings. If the security deposit is in the form of a Letter of Credit and if requested by any such mortgagee or other purchaser, Tenant shall obtain an amendment to the Letter of Credit which names such mortgagee or other purchaser as the beneficiary thereof in lieu of Landlord. This security deposit shall not be transferable by Tenant to any assignee or subtenant, but shall be held and returned directly to Tenant.

(f) Reservation of Rights. No right or remedy available to Landlord as provided in this Section 35 shall preclude or extinguish any other right to which Landlord may be entitled. In furtherance of the foregoing, it is understood that in the event Tenant fails to perform its obligations, any amounts recovered from the security deposit shall not be deemed liquidated damages. Landlord may apply such sums to reduce Landlord's damages and such application of funds shall not in any way limit or impair Landlord's right to seek or enforce any and all other remedies available to Landlord to the extent allowed hereunder, at law or in equity.

(g) Return of Security Deposit. Landlord shall have the right, at Landlord's discretion, to hold the security deposit until such time that a final determination is made of all obligations of Tenant under this Lease; provided, however, that Landlord shall only retain so much of the security deposit as Landlord determines is reasonably required to cover any defaults and any undetermined obligations of Tenant under this Lease (including without limitation any obligation of Tenant in connection with any damage to the Demised Premises or Building or any obligations under Section 4 of the Lease) and Landlord shall return, within sixty (60) days after the date that the Term has ended and Tenant has vacated the Demised Premises, the amount not so retained. The final determination shall be made no later than one hundred

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twenty (120) days after the end of the calendar year in which the Term expires or one hundred twenty (120) days after the end of the Operating Cost Year in which the Term expires, whichever is later.

36. Landlord as an Individual or Partnership. If Landlord or any successor in interest to Landlord shall be an individual, corporation, limited liability company, joint venture, tenancy in common, firm or partnership, general or limited, there shall be no personal liability on any partners, successors or affiliates of Landlord (whether or not an individual, corporation or other entity) or on any employees, members, officers, directors, or other individuals of Landlord or of its successors, partners or affiliates, with respect to any of the provisions of this Lease or any obligation arising therefrom or in connection therewith. In such event, Tenant shall look solely to the equity of the then owner of the Building in the Building for the satisfaction of any remedies of Tenant in the event of a breach by Landlord or its successors of any of its obligations hereunder. No other asset of Landlord, any partner, director, member, officer or trustee of Landlord or any other person or entity shall be available to satisfy or be subject to any judgment against Landlord in connection with this Lease.

37. Financial Statements. Tenant (and any guarantor of this Lease), upon written request by Landlord, will provide Landlord with a copy of its most recent financial statements, consisting of a Balance Sheet, Earnings Statement, Statement of Changes in Financial Position, Statement of Changes in Owner's Equity, and related footnotes, prepared in accordance with generally accepted accounting principles. Such financial statements must be either certified by a certified public accountant or sworn to as to their accuracy and completeness by Tenant's (or the guarantor's, if applicable) chief financial officer. The financial statements provided must be as of a date not more than twelve (12) months prior to the date of request. Landlord shall retain such statements in confidence, but may provide copies to any lender, potential lender, purchaser or potential purchaser in connection with a financing or potential financing or sale or potential sale of the Building or any interest therein or in Landlord. Notwithstanding the foregoing, if Tenant is not in default of any term, condition or covenant hereunder (beyond the expiration of any applicable notice and cure period expressly set forth in Section 19 hereof), Tenant shall not be required to provide Landlord with such financial statements more frequently than one (1) time per each calendar year, unless such financial statements are required in connection with an appraisal, financing, potential financing, sale or potential sale of the Property (or any part thereof) or any interest therein or in Landlord.



38. Mortgagee Protection. Tenant agrees to give any mortgagee(s), by certified or registered mail, postage prepaid, return receipt requested, a copy of any notice of any failure by Landlord to fulfill any of its obligations under this Lease served upon Landlord by Tenant, provided that prior to such notice Tenant has been notified in writing (by way of notice of assignment of rents and leases, or otherwise) of the addresses of such mortgagee(s). Tenant further agrees that the mortgagee(s) shall have such time as may be necessary to cure such failure as long as any mortgagee(s) has commenced and is diligently pursuing the remedies necessary to cure such failure (including, but not limited to, time to take possession and/or commence foreclosure proceedings, if necessary to effect such cure).

39. Energy Conservation and Governmental Policies. Landlord shall be deemed to have observed and performed the terms and conditions to be performed by Landlord under this Lease, including those relating to the provisions of utilities and services, if in so doing it acts in accordance with a directive, policy, or request of a governmental, quasi-governmental, public or other authority in respect of energy conservation or security.

40. Landlord's Rights to Building Maintenance and Renovations. Landlord shall have the following rights in maintaining, repairing and/or renovating the Building:

(a) to enter the Demised Premises at any reasonable time, upon reasonable prior notice, except in the case of an emergency, to perform routine maintenance and repairs deemed appropriate by Landlord;

(b) to change or alter from time to time the arrangement and/or location of public entrances, passageways, doors, doorways, corridors, elevators, stairs, toilets or other parts of the Building and to make any additions to the Building or areas of the Building and to change the name, street number or designation by which the Building may be known; provided that if Landlord changes the street number and such change is not made by, directed by or requested by, the postal service or any governmental or quasi-governmental authority, then Landlord shall reimburse Tenant for the actual cost of the letterhead and other

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stationery on hand which bears the old address of the Building, but in no event more than Three Thousand Dollars (\$3,000.00);

(c) to have access to all mail chutes, if any, according to the rules of the United States Postal Service or any successor thereto;

(d) if Tenant vacates the Demised Premises prior to the expiration of the Term, to make alterations or to otherwise prepare the Demised Premises for reoccupancy without relieving Tenant of its obligation to pay Rent through the Lease Expiration Date;

(e) to carry out a renovation program for the Building. In performance of the renovation program, Landlord, its agents, contractors, and all persons retained in connection therewith, shall have the right to enter the Demised Premises to perform renovation work after Building hours, upon at least one (1) day's notice. Tenant shall cooperate with Landlord in temporarily relocating furniture, fixtures, personal property, and personnel as required to complete the renovation work in the Building.

(f) any work performed by Landlord in accordance with this Section 40 shall be with the minimum disruption practicable to Tenant's occupancy, but such work shall not give Tenant the right to abate Rent or otherwise fail to perform its obligations hereunder.

41. Adjacent Excavation, Shoring. If an excavation shall be made upon land adjacent to the Building, or shall be authorized to be made, Tenant shall afford to the person causing or authorized to cause such excavation, license to enter upon the Demised Premises for the purpose of doing such work as said person shall deem necessary to preserve the Building and the walls thereof of which the Demised Premises form a part from injury or damage and to support the same by proper foundation without any claim for damages or indemnity against Landlord or diminution or abatement of Base Rent or Additional Rent.

42. Patriot Act Compliance. Landlord and Tenant each represents and warrants that it is not acting, directly or indirectly, for or on behalf of any person, group, entity or nation named by the United States Treasury Department as a Specially Designated National and Blocked Person, or for or on behalf of any person, group, entity or nation designated in Presidential Executive Order 13224 as a person who commits, threatens to commit, or supports terrorism, and that it is not engaged in this transaction directly or indirectly on behalf of, or facilitating this transaction directly or indirectly on behalf of, any such person, group, entity or nation.

43. Joint and Several Liability. To the extent that Tenant comprises more than one individual and/or entity or is partnership, or a professional corporation, all such individuals, entities, partners and/or principals comprising Tenant shall be jointly and severally liable for all of the obligations, agreements and covenants of Tenant hereunder. If Tenant comprises more than one individual and/or entity or is partnership Landlord shall be bound only by notices received by it from Tenant if such notices are signed by all of the entities and individuals comprising Tenant (or all general partners in the case of a partnership).

44. Environmental Matters.

(a) Tenant, its agents and employees, shall not violate or cause to be violated any federal, or applicable state or local law, ordinance or regulation relating to the environmental conditions on, under or about the Demised Premises or the Building, or the Land, including, but not limited to soil and ground water conditions. Tenant, its agents and employees shall not introduce, use, generate, store, accept or dispose of on, under or about the Demised Premises, the Building, or the Land or transport to or from the Demised Premises, the Building, or the Land any hazardous wastes, toxic substances, pollutants or related materials ("**Hazardous Materials**"). For the purposes of this Article, Hazardous Materials shall include, but not be limited to substances defined as "hazardous substances" or "toxic substances" in the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 U.S.C. Section 9061, *et seq.*; Hazardous Materials Transportation Act, 49 U.S.C. Section 1802; and Resource Conservation and Recovery Act of 1976, 42 U.S.C. Section 6901 *et seq.* and any other substances considered hazardous, toxic or the equivalent pursuant to any other applicable laws and in the regulations adopted and publications promulgated pursuant to said laws or any future laws or regulations (collectively, the "**Environmental Laws**").

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
(b) Tenant shall clean up and remove or cause to be cleaned up and removed from, under or about the Demised Premises, the Building or the Land any Hazardous Materials it or its agents or employees have or have caused to be introduced, at its sole cost and expense, and shall ensure that such removal is conducted in compliance with all applicable Environmental Laws.

(c) Tenant shall promptly deliver notice to Landlord if Tenant obtains knowledge sufficient to infer that Hazardous Materials are located on the Demised Premises, the Building or the Property that are not in compliance with applicable Environmental Laws or if any third party, including without limitation, any governmental agency, claims a significant disposal of Hazardous Materials occurred on the Demised Premises, the Building or the Property or is being or has been released from the Demised Premises, the Building or the Property. Upon reasonable written request of Landlord, Tenant, through its appropriately qualified and licensed professional engineers, and at Tenant's cost, shall thoroughly investigate suspected Hazardous Materials contamination of the Demised Premises, the Building or the Property that Landlord in good faith believes may constitute a breach of Tenant's obligation or requirements hereunder or would otherwise be Tenant's responsibility hereunder. Tenant, using duly licensed and insured contractors reasonably approved by Landlord, shall promptly commence and diligently complete the removal, repair, clean-up, and detoxification of any Hazardous Materials from the Demised Premises, the Building and the Property, as may be required by applicable Environmental Laws, which results from a breach of Tenant's obligation or requirements hereunder or would otherwise be Tenant's responsibility hereunder.

45. Common Facilities. From time to time, Landlord may provide for use in common by any tenants in the Building, and others as Landlord may in its sole judgment direct, certain facilities, such as a health club, exercise rooms or shower rooms (the "**Common Facilities**"). All costs of operating and maintaining the Common Facilities shall be included in Operating Costs. In addition, if Landlord determines in its sole discretion to staff any of the Common Facilities with any personnel, all costs associated therewith shall be included in Operating Costs. Tenant agrees that its use of the Common Facilities shall be subject to and in accordance with such reasonable rules and regulations as Landlord may promulgate from time to time covering the use of the Common Facilities, and that any use of the Common Facilities by Tenant, its employees or invitees, shall be at their sole risk, cost and expense. Landlord shall not be responsible for any injury, loss or damage suffered by Tenant, its employees or invitees, arising out of or in any way connected with or related to their use of the Common Facilities, except to the extent caused by Landlord's gross negligence or willful misconduct.

46. Mechanic's Liens. No work performed by Tenant pursuant to this Lease, whether in the nature of erection, construction, alteration or repair, shall be deemed to be for the immediate use and benefit of Landlord, nor shall Tenant be deemed to be the agent of Landlord in performing such work, so that no mechanic's or other lien shall be allowed against the estate of Landlord by reason of any consent given by Landlord to Tenant to improve the Demised Premises. Tenant shall pay promptly all persons furnishing labor or materials with respect to any work performed by Tenant or its contractor on or about the Demised Premises. Without limiting Tenant's obligations under Section 9 hereof or this Section 46, if any mechanic's or other lien shall at any time be filed against the Demised Premises or the Building by reason of work, labor, services or materials performed or furnished, or alleged to have been performed or furnished, to Tenant or to anyone holding the Demised Premises through or under Tenant, Tenant shall, within ten (10) days after Tenant has been notified of the filing thereof, cause the same to be discharged of record by the payment thereof or by filing any bond required by law. If Tenant shall fail to cause such lien to be so discharged within such ten (10)-day period, then, in addition to any other right or remedy of Landlord, Landlord may discharge the same by paying the amount claimed to be due, and the amount so paid by Landlord, including reasonable attorneys' fees incurred by Landlord either in defending against such lien or in procuring the discharge of such lien, together with interest thereon at the Interest Rate per annum shall be immediately due and payable by Tenant to Landlord as Additional Rent; it being hereby expressly covenanted and agreed that such discharge by Landlord shall not be deemed to waive, or release, the default of Tenant in not discharging the same.

47. Covenants Running With the Land. Tenant hereby acknowledges and agrees that this Lease shall be subject to any covenants now or hereafter recorded among the land records of the jurisdiction in

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which the Property is located affecting the Property, as such covenants may be amended by Landlord or any ground lessor at such person's sole discretion, from time to time.

48. Parking.

(a) Provided that Tenant is not in default under this Lease (beyond any applicable notice and cure period expressly set forth in Section 19 hereof), Tenant shall have the right to purchase the number of monthly parking space contracts set forth in the Basic Lease Information, from the Building garage operator, on an unreserved basis and at the prevailing rates, terms and conditions as established by the Building garage operator from time to time.

(b) ~~If Tenant fails to maintain, or elects and be of no further force, during the twelve (12) months after the Lease Commencement Date, to purchase fewer than, the full number of monthly parking space contracts to which it is entitled under Section 48(a), above, Tenant's right to purchase the remaining contracts shall terminate (such remaining contracts being referred to as the "Remaining Parking Contracts");~~ provided, however, if Tenant at any time possesses less than five (5) monthly parking space contracts and thereafter requests that Landlord cause the garage operator to sell to Tenant a portion of the Remaining Parking Contracts to which Tenant would otherwise be entitled to under Section 48(a) (but in no event greater than the amount sufficient for Tenant to possess in the aggregate (5) monthly parking space contracts), then Landlord shall cause the garage operator to sell to Tenant, within sixty (60) days after the first day of the first calendar month which occurs after the date of such request, such amount of the Remaining Parking Contracts requested by Tenant (but in no event greater than the amount sufficient for Tenant to possess in the aggregate (5) monthly parking space contracts), provided such number of Remaining Parking Contracts are then-available for Landlord to sell. Such availability shall be reasonably determined by Landlord based upon all relevant factors, including, without limitation, the parking spaces then subject to parking contracts and the parking spaces required to satisfy future leasing needs, as well as the parking spaces Landlord requires to accommodate handicapped persons and visitors of tenants in the Building. Notwithstanding the foregoing, in no event shall Tenant be entitled to more of the Remaining Parking Contracts than the number, which when added to the other monthly parking space contracts then possess by Tenant, equals five (5) parking contracts, it being understood that Tenant shall not be entitled to any of the Remaining Parking Contracts until Tenant possesses less than five (5) monthly parking contracts, and once Tenant possesses less than five (5) monthly parking contracts, Tenant shall no longer be entitled to more than five (5) monthly parking contracts.

(c) All monthly parking space contracts obtained by Tenant are non-transferable other than to permitted sublessees and assignees hereunder.

(d) Use of the Building garage by Tenant, its employees, agents and business invitees is subject to the rules and regulations of Landlord and/or the Building garage operator as may be promulgated or amended by Landlord and/or the Building garage operator from time to time.



(e) Tenant shall have access to the Building garage 24 hours per day, 365 days per year.

49. Miscellaneous.

(a) Feminine or neuter pronouns shall be substituted for those of the masculine form, and the plural shall be substituted for the singular number, in any place or places herein in which the context may require such substitution.

(b) Landlord and Tenant hereby waive their right to a trial by jury in any action, proceeding or counterclaim brought by either of the parties hereto against the other in respect of any matter whatsoever arising out of or in any way connected with this Lease, the relationship of Landlord and Tenant hereunder, Tenant's use or occupancy of the Demised Premises, and any claim or counterclaim of injury, damage or otherwise by Landlord and Tenant against or with respect to each other.

(c) This Lease contains and embodies the entire agreement of the parties hereto, and supersedes and revokes any and all negotiations, arrangements, letters of intent, representations, inducements or other agreements, oral or in writing. No representations, inducements or agreements, oral or in writing, between the parties not contained in this Lease, shall be of any force or effect. This

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Lease shall not be modified, changed, amended, altered or terminated in whole or in part in any manner other than by an agreement in writing duly executed by both parties hereto. No person or entity purporting to represent Landlord (or otherwise have the authority to bind Landlord) shall have any power or authority (apparent or otherwise) to execute this Lease or any amendment to this Lease or make any representation or warranty on behalf of Landlord or otherwise bind Landlord in any respect, except the individual or entity expressly and duly authorized to do so by Landlord. This Lease may be executed in multiple counterparts, each of which shall constitute an original and all of which taken together shall constitute one and the same agreement. Tenant shall keep the content of this Lease and any related documents strictly confidential and shall not disclose such confidential information to any person or entity other than Tenant's financial, legal, and space planning consultants or as required by any Applicable Laws.

(d) Prior to or upon execution of this Lease, Tenant (unless Tenant is an individual) shall deliver to Landlord, in a form satisfactory to Landlord, incumbency certificates and organizational status certificates and resolutions of the governing body of Tenant (and of any non-individual executing this Lease on behalf of Tenant) authorizing the execution of this Lease by the individual so executing and confirming that the Tenant is in good standing in the jurisdiction of its formation.

(e) This Lease shall be construed under the laws of the jurisdiction in which the Building is located. If any provision of this Lease or the application thereof to any person or circumstances shall to any extent be held by a court of competent jurisdiction invalid or unenforceable, the remainder of this Lease, or the application of such provision to persons or circumstances other than those as to which it is invalid or unenforceable, shall not be affected thereby, and each provision of this Lease shall be valid and be enforced to the fullest extent permitted by law.



(f) Any references in this Lease to the term "**day**" shall be deemed to mean "calendar day" unless expressly stated otherwise.

(g) The captions and underlining of specific words herein are for convenience of reference only and shall not define, limit or expand the meaning of the provisions of this Lease. In addition, the deletion of any printed, typed or other portion of this Lease compared to a draft hereof shall not evidence an intent to contradict such deleted portion. Such deleted portion shall be deemed not to have been inserted in this Lease. In addition, there shall be no presumption that this Lease be construed more strictly against the party who itself or through its agent prepared it, it being agreed that all parties hereto have participated in the preparation of this Lease and that each party had the opportunity to consult legal counsel before the execution of this Lease. The obligations of Tenant under this Lease shall be construed as independent and not dependent upon the performance of any obligation of Landlord.

(h) This Lease shall not be recorded without Landlord's prior written consent. If this Lease is recorded by either party hereto, such party will bear the full cost of any transfer, documentary stamp or other tax, and any recording fee, assessed in connection with such recordation.

(i) If Tenant is a corporation, the persons executing this Lease on Tenant's behalf agree and warrant that Tenant is a duly constituted corporation qualified to do business in the jurisdiction in which the Property is located, and such persons are duly authorized by the board of directors of such corporation to execute and deliver this Lease on behalf of the corporation. Tenant certifies that if it is operating under a fictitious name that said name has been duly recorded according to the laws of the jurisdiction in which the Property is located and has attached hereto a copy of said registration form.

(j) Landlord and Tenant, each, shall be excused from performing any given obligation or undertaking provided for in this Lease so long as such performance is prevented or delayed, retarded or hindered by an Act of God, fire, earthquake, flood, explosion, action of the elements, war, invasion, insurrection, riot, mob violence, sabotage, inability to procure or a general shortage of labor, equipment, facilities, materials or supplies in the open market, failure of transportation, strike, lockout, action of labor unions, a taking by eminent domain, requisition, laws, orders of government, or of civil, military or naval authorities, inability to obtain, or delays in obtaining, permits or other governmental approvals, or any other cause whether similar or dissimilar to the foregoing, not within the reasonable control of Landlord or Tenant, as applicable (collectively, "**Force Majeure**"); provided, however, that no such event or cause

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shall delay the Lease Commencement Date or Tenant's obligation to make full and timely payments of Rent or any of its other monetary obligations payable hereunder.

[signature page follows]


Handwritten signature

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Landlord <i>EJ</i>	Tenant <i>MDC</i>

IN WITNESS WHEREOF, Landlord and Tenant have each executed this Office Lease on the day and year hereinabove written.

TENANT:

COUNCIL OF THE GREAT CITY SCHOOLS


By: 
Name: Michael D. Caserly
Title: Executive Director

LANDLORD:

NATIONAL PLACE LEASE COMPANY, LLC

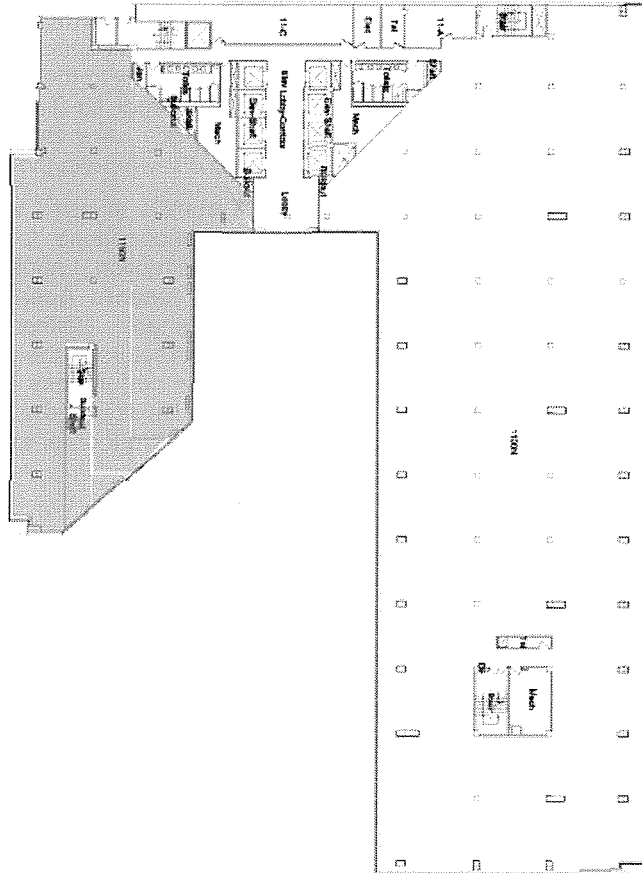
By: National Place Company, LLC, sole member

By: Quadrangle Development Corporation,
managing member

By: 
Name:
Title: **Christopher Gladstone**
President

Approved by LEGAL


EXHIBIT A
FLOOR PLAN OF THE DEMISED PREMISES



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EXHIBIT B

WORK AGREEMENT

This Work Agreement is attached to and made a part of that certain Office Lease (the "**Lease**") by and between **NATIONAL PLACE LEASE COMPANY, LLC**, as landlord ("**Landlord**") and **COUNCIL OF THE GREAT CITY SCHOOLS**, as tenant ("**Tenant**") for the premises (the "**Demised Premises**") described therein and consisting of approximately 8,293 square feet of Gross Rentable Area in the building located at 1331 Pennsylvania Avenue, N.W., Washington, D.C. (the "**Building**"). This Work Agreement sets forth the understandings and agreements of Landlord and Tenant regarding the performance by Landlord of work in and to the Demised Premises in connection with the preparation of the Demised Premises from its "as is, where as" condition as of the date hereof for Tenant's original occupancy and use (all such work shall be referred to herein as "**Tenant Work**"). Any capitalized terms used herein, not otherwise defined herein, shall have the meanings set forth elsewhere in the Lease.

1. Tenant's Agent. Tenant hereby designates Teri Trinidad ("**Tenant's Agent**") whose email address is: ttrinidad@cgcsc.org as having authority to approve plans and specifications, to accept cost estimates, and to authorize changes or additions to Tenant Work during construction. Landlord shall not be required to proceed with any Tenant Work without authorization by Tenant's Agent. Any such authorization by Tenant's Agent shall be deemed to be authorization by Tenant. Neither Tenant nor Tenant's Agent shall be authorized to direct Landlord's contractors or subcontractors in the performance of Tenant Work, and in the event that Landlord's contractors or subcontractors perform any Tenant Work under the direction of Tenant or Tenant's Agent, then Landlord shall have no liability for the cost of such Tenant Work, for the cost of corrective work required as a result of such Tenant Work or for any delay that may result from such Tenant Work.

2. Plans and Specifications.

(A) It is agreed that Tenant will develop plans and necessary specifications for completion of Tenant Work in accordance with the following schedule; provided, however, that (i) Tenant's architect shall be entitled to deliver, on Tenant's behalf, any such plans and specifications required hereunder to be delivered by Tenant to Landlord; and (ii) at Tenant's sole cost, Tenant shall use Blue Moon engineering firm to prepare any plans, specifications and/or drawings involving mechanical, electrical, structural, plumbing, sprinkler and/or fire or life/safety work for the Demised Premises:

(i) On or before January 21, 2016, Tenant shall deliver to Landlord Tenant's Preliminary Plans (as defined below) for the entire Demised Premises and shall indicate its approval of the Preliminary Plan in writing by signing and dating such Preliminary Plans. The "**Preliminary Plans**" shall set forth:

- (a)** the location of fixtures, furniture and office equipment;
- (b)** the location and specification of telephone and other communications outlets;
- (c)** the location and specification of electrical outlets, especially those required to accommodate items such as computers and 220-volt equipment;
- (d)** the location of copy machines larger than table-top size, computer equipment, telex machines, and other heat-producing machines, and specification of heat output (BTU/hour) and required operating conditions (maximum/minimum temperature, hours of operation);
- (e)** the location of conference rooms and other rooms subject to occupancy by more than six (6) persons at a time and the specification of maximum expected occupancy;
- (f)** a reflected ceiling plan for all lighting desired by Tenant, and specification of any Tenant Work involving lighting;
- (g)** any Tenant Work which is likely to require a longer-than-usual period of time to construct or acquire;

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Exhibit B, Page 2

- (h) the location of all partitions in the Demised Premises; and
- (i) any special requirements.

(ii) Within four (4) business days after Tenant delivers to Landlord Tenant's Preliminary Plans, Landlord shall deliver to Tenant in writing its approval of the Preliminary Plans or changes to the Preliminary Plans that will be required to obtain Landlord's approval.

(iii) Within five (5) business days after Landlord delivers to Tenant its required revisions to the Preliminary Plans, Tenant shall deliver to Landlord revised Preliminary Plans containing the required revisions and such suggested revisions as Tenant chooses to incorporate.

(iv) Within two (2) business days after Tenant delivers to Landlord revised Preliminary Plans, Landlord shall deliver its confirmation that all required revisions have been made (if such is the fact) and its approval of the revised Preliminary Plans.

(v) Within thirty (30) days after Landlord approves the Preliminary Plans, Tenant shall deliver to Landlord detailed architectural, mechanical, plumbing and electrical (and structural, if required) working drawings and construction documents for the Tenant Work (including without limitation, the HVAC systems and fire and life safety systems), based upon the approved Preliminary Plans, prepared by Tenant's architects and engineers, and Tenant shall indicate its approval of such working drawings and construction documents in writing by signing and dating such working drawings and construction documents (the "**Construction Documents**").

(vi) Within five (5) business days after Tenant delivers to Landlord the Construction Documents, Landlord shall indicate its approval of the Construction Documents in writing by signing and dating such Construction Documents in the space provided, or shall indicate the reasonable revisions required due to errors or omissions in the drawings.

(vii) Within five (5) business days after Landlord indicates the revisions required due to errors or omissions in the Construction Documents, Tenant shall correct such errors or omissions and resubmit the Construction Documents to Landlord for its approval. Provided such errors or omissions have been corrected, Landlord shall then approve the Construction Documents. If Tenant desires to make revisions in the Construction Documents after Landlord has approved such Construction Documents, then such changes shall be made only pursuant to Paragraph 4 hereof.

(viii) Promptly after the Construction Documents have been approved by Landlord, Tenant shall provide to Landlord a CAD diskette of the Construction Documents and, upon any revisions to the Construction Documents pursuant to this Work Agreement, provide to Landlord a CAD diskette of the revised Construction Documents.

(ix) If Landlord requests any additional information or clarifications from Tenant regarding the Tenant Work or the Plans, Tenant shall provide such information or respond to such inquiries, as requested, within three (3) business days after such request; and any delay in providing such information or responding to such inquiries shall constitute a Tenant-Caused Delay (defined below).

(B) The Preliminary Plans and the Construction Documents, as finally approved by both Landlord and Tenant in accordance with the foregoing provisions of this Paragraph 2, shall collectively constitute the "**Plans**." The Plans (and any revisions thereto) are expressly subject to Landlord's prior written approval, which approval shall not be unreasonably withheld, conditioned or delayed, unless the proposed Tenant Work could, in Landlord's judgment, be or result in a Building Issue. Notwithstanding the foregoing, Tenant shall be solely responsible for the content of the Plans and coordination of the Plans with base building design. In addition, Landlord's approval of the Plans shall not constitute a warranty, covenant or assurance by Landlord that (i) any equipment or system shown thereon will have the features or perform the functions for which such equipment or system was designed, (ii) the Plans satisfy applicable code requirements, (iii) the Plans are sufficient to enable Landlord's contractor or

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Exhibit B, Page 3

Tenant's contractor (as applicable) to obtain a building permit for the Tenant Work, or (iv) the Tenant Work described thereon will not interfere with, and/or otherwise adversely affect, base Building systems. Tenant shall be solely responsible for the Plans' compliance with all applicable laws, rules and regulations of any governmental entity having jurisdiction over the Building and the Demised Premises. Notwithstanding the foregoing, if Landlord determines at anytime that the Tenant Work described on the Plans does or will interfere with and/or otherwise adversely affect any base Building systems or does not or will not comply with any applicable law, rule or regulation, then the Plans shall be amended, at Tenant's cost, so that the Tenant Work will not interfere with, and/or otherwise adversely affect, such base Building systems and/or will not violate any applicable law, rule or regulation, and any delay arising in connection therewith shall constitute a Tenant-Caused Delay.

(C) Tenant shall pay the cost of preparing the Plans. Tenant may elect to apply a portion of the Tenant Work Allowance against the cost of the Plans. Tenant acknowledges that it must meet all of the schedule deadlines set forth herein in order to allow Landlord sufficient time to review the Plans, estimate costs, and substantially complete the Tenant Work within the contemplated time frame and that Tenant is required to be meet such deadlines, even if certain deadlines occur prior to the date the Lease is executed.

3. Construction of Tenant Work.

(A) Landlord agrees to provide and install, on Tenant's behalf, the Tenant Work shown on the Plans. The Plans shall be conclusive as to the entire scope of Tenant Work to be performed by Landlord. Prior to commencing any Tenant Work, Landlord will submit to Tenant written estimates of the cost thereof in accordance with the following schedule:

(i) Within ten (10) business days after approval by Landlord and Tenant of the Plans (and after Tenant has corrected any errors or omissions in the Construction Documents pursuant to Paragraph 2(A)(vii) hereof) or as soon thereafter as the bidding contractors deliver their bids to Landlord, Landlord shall submit to Tenant written estimates of the cost of Tenant Work, based upon bids received by Landlord from contractors solicited for bids by Landlord. Landlord will solicit bids from at least the following contractors: DFS Construction Corp., Hitt Contracting Inc., and DPR Construction. Landlord shall prepare bid instructions and coordinate and receive all bids. Tenant shall be entitled to select the contractor and its bid pursuant to Section 3(A)(ii) below.

(ii) Within three (3) business days after Landlord's submission of such estimates to Tenant, Tenant shall deliver to Landlord its written acceptance of such estimates (by accepting the bid of one of the contractors bids solicited and received by Landlord, which shall be subject to Landlord's reasonable approval), or if Tenant does not wish to accept such estimates, Tenant shall have the right to revise the Plans and obtain rebids in accordance with Paragraph 3(A)(iii), below.

(iii) If Tenant desires to make revisions to the Plans and obtain rebids for Tenant Work, Tenant shall be responsible for directing the architects and engineers in revising the Plans and shall pay all fees incurred in making such revisions. Tenant shall deliver to Landlord any such revised Plans approved and dated by Tenant in writing. Upon delivery of any approved revised Plans by Tenant, Landlord shall attempt to obtain rebids within a reasonable time period and resubmit them for Tenant's acceptance. Landlord shall not be responsible for escalations in the original cost estimates due to delays in acceptance caused by Tenant's desire for rebids. The time necessary to revise the Plans and obtain rebids shall constitute a Tenant-Caused Delay.

(B) Tenant shall pay an administrative fee equal to two percent (2%) of the Hard Construction Costs (hereinafter defined) to compensate Landlord for reviewing the Plans and/or the supervision and/or coordination of the Tenant Work, which supervision and coordination shall include bidding out the Tenant Work, attending construction meetings, paying invoices for construction costs and coordinating access to the Building by contractors. Such administrative fee shall be payable as Additional Rent and at Landlord's election shall be either paid by Tenant to Landlord within ten (10) calendar days after receipt of invoice from Landlord, or deducted from any available Tenant Work Allowance. As used herein, the term "Hard Construction Costs" means the cost of all materials, labor and services incurred

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Exhibit B, Page 4

in connection with the performance of the Tenant Work, including, without limitation, the cost of all permits and licenses, contractors' overhead and profit, insurance, bonds incurred in connection therewith, but not including the costs of architectural and design services.

(C) Within five (5) days of acceptance of the cost estimates for the Tenant Work, Tenant shall pay to Landlord an amount equal to the total estimate of the Tenant Work including the administrative fees payable to Landlord, less the Tenant Work Allowance remaining available ("**Excess Costs**"). Landlord shall not be obligated to commence any work until such Excess Costs are paid, and any delay in such payment shall be deemed a Tenant-Caused Delay.

(D) Upon Tenant's written acceptance of cost estimates and payment of the administrative fee as set forth in Paragraph 3(B), above, and the Excess Costs as set forth in Paragraph 3(C), above, Landlord shall authorize its contractors to proceed with construction of Tenant Work. Notwithstanding anything to the contrary contained herein, Landlord shall, at Tenant's cost (subject to application of the Tenant Work Allowance), retain Adcock Systems for all fire/life safety tie-in work and all work relating thereto.

(E) Tenant shall pay the cost of all Tenant Work, subject to application of the Tenant Work Allowance as set forth in Paragraph 8 hereof. Any costs payable under this Work Agreement that are not paid from the Tenant Work Allowance shall be payable as Additional Rent by Tenant to Landlord within ten (10) calendar days after receipt of an invoice therefor from Landlord. Landlord shall be entitled to suspend construction of any of the Tenant Work and/or performance of any of Landlord's obligation hereunder while Tenant is late on the payment of any amount payable under the Lease (including without limitation, any provision of this Work Agreement) or while Tenant is in violation or default of any provision of the Lease (including without limitation, any provision of the Work Agreement), and any delay resulting therefrom shall be deemed a Tenant-Caused Delay.

4. Change Orders. If Tenant shall request changes or additions to the Tenant Work being performed by Landlord after approval of the Plans by Landlord, Tenant shall be responsible for revising the Plans to reflect such changes or additions, and such changes or additions to the Tenant Work and the revisions to the Plans shall be subject to Landlord's written approval. Landlord shall have no obligation to perform such changes or additions if, in Landlord's sole opinion, such changes cannot be accommodated in Landlord's construction schedule for completion of Tenant Work. Landlord shall not be required to perform any such changes or additions until Landlord receives written authorization from Tenant and payment of 100% of Landlord's informal estimate of the cost of the new Tenant Work, it being expressly understood that due to time requirements Landlord may not deliver to Tenant a final price for such Tenant Work until after it has been performed, and that Tenant shall be required to make final payment of the difference between Landlord's estimate and actual price as Additional Rent within five (5) days upon being invoiced therefor, subject to reasonable verification that charges are actual charges of contractor but not subject to dispute as to the reasonableness of such charges. Any delays caused by any such changes or additions to the Tenant Work, any such revisions to the Plans or any delay in Tenant providing Landlord with authorization to perform the new Tenant Work or paying any amount required to be paid hereunder shall be deemed a Tenant-Caused Delay.

5. Base Building Changes. If Tenant requests work to be done in the Demised Premises or for the benefit of the Demised Premises that necessitates changes to the base Building or Building systems, or the design thereof, any such changes shall be subject to prior written approval of Landlord, in its sole discretion, and Tenant shall be responsible for all costs resulting from such changes, including architectural and engineering charges, and any special permits or fees attributed thereto. Any delay resulting from such changes shall be deemed a Tenant-Caused Delay. Before any such changes are made, Tenant shall pay to Landlord the full costs estimated to be incurred by Landlord in connection with such changes including without limitation Landlord's administrative fee attributable thereto as set forth in Paragraph 3(B) hereof.

6. Possession of the Demised Premises. Tenant, by taking possession of the Demised Premises, is deemed to acknowledge that all work to be performed hereunder by Landlord has been satisfactory performed by Landlord as hereinabove set forth, subject to such punch list items as may be agreed to by Landlord and Tenant.

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Exhibit B, Page 5

7. **Tenant-Caused Delays.** Each of the following shall be deemed a "Tenant-Caused Delay" hereunder:

(A) any cause or event that is deemed to be a "Tenant-Caused Delay" pursuant to any of the provisions of this Work Agreement;

(B) Tenant's failure to deliver its approved Preliminary Plans or Construction Documents, or to deliver the information or respond to the inquires or to take any of the other actions, described in Paragraph 2, above, by the dates specified in Paragraph 2, above;

(C) Tenant's request for any changes in the Plans or rebids as set forth in Paragraph 3 hereof;

(D) Tenant's failure to approve cost estimates for Tenant Work or pay for Excess Costs within the time required under Paragraph 3 hereof;

(E) any changes or additions to the Tenant Work or the Plans made after Landlord has approved same as set forth in Paragraph 4 hereof or changes to the base Building or Building systems as set forth in Paragraph 5 hereof;

(F) Tenant's request for materials, finishes or installations which are out of the ordinary or which would take a longer-than-normal time to obtain or install;

(G) the performance of, or failure to timely complete, work by Tenant or any person, firm, or entity hired or employed by Tenant, including without limitation, the failure to timely complete the installation or construction of any systems furniture to be installed or constructed by Tenant or any person, firm, or entity hired or employed by Tenant;

(H) the failure of any equipment, materials or other items that are provided by Tenant and installed by Landlord to be delivered to Landlord in the time necessary for their installation or use, or the failure of any such equipment, materials or other items to comply with all required specifications; or

(I) any other delays resulting from the actions or inactions of Tenant, or its agents, contractors or employees.

Tenant shall pay to Landlord all additional costs incurred by Landlord resulting from any Tenant-Caused Delay.

8. **Tenant Work Allowance.** Provided there in no default under the Lease, Landlord agrees to provide Tenant with an allowance ("**Tenant Work Allowance**") in the amount of Eighty-Seven Dollars (\$87.00) per square foot of Gross Rentable Area in the Demised Premises, to be applied against the actual out-of-pocket third party costs and expenses incurred in connection with the design and construction of the Tenant Work, including the actual construction costs and architectural and engineering fees incurred in connection therewith, and costs incurred in connection with the purchase and installation of Tenant's built-in and/or system furniture, fixtures, equipment and cabling and wiring in the Demised Premises. If (i) the full amount of the Tenant Work Allowance has not been used in accordance with the foregoing as of the date the Tenant Work is complete and (ii) Tenant is not then in default of the Lease, then, the balance thereof (but not to exceed an amount equal to ten percent (10%) of the Tenant Work Allowance) shall be applied by Landlord to Base Rent next due and payable by Tenant under the Lease, with any remainder being retained by Landlord, and forfeited by Tenant. Landlord shall pay the Tenant Work Allowance directly to the contractor(s) performing the Tenant Work in accordance with Landlord's standard procedures and policies. Notwithstanding the foregoing, Landlord shall have the right, without the obligation, to apply all or any portion of the undisbursed Tenant Work Allowance to remedy any default by Tenant occurring hereunder; provided, however, it is expressly covenanted and agreed that such remedy by Landlord shall not be deemed to waive, or release, the default of Tenant.

9. **Contractor's Rules and Regulations.** Subject to the terms of Section 2(d) of the Lease, Tenant's contractors, subcontractors and vendors may not enter the Building to perform any work or installations prior to the Lease Commencement Date without Landlord's prior written consent. If Landlord consents to such entry, each contractor, subcontractor or vendor shall observe all rules and regulations


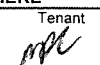
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Exhibit B, Page 6

promulgated by Landlord in connection with the performance of work in the Building, including those attached to the Lease as **Exhibit E**.

10. Landlord Work. Notwithstanding anything to the contrary contained herein or in the Lease, Landlord shall, prior to the Lease Commencement Date and at Landlord's sole cost and expense perform the following work: (i) install in the Demised Premises Building-standard blinds selected by Landlord and (ii) replace the base Building interior air handling unit serving the Demised Premises with a unit selected by Landlord and balance the same.

11. Partial Deferral of Tenant Work Allowance. Notwithstanding anything to the contrary contained herein or in the Lease, Tenant shall have the right, by delivering written notice to Landlord (the "**Partial Deferral Notice**") within five (5) business days after the date of Tenant's written acceptance of the estimate of the cost of the Tenant Work pursuant to Paragraph 3, above, to defer a portion of the Tenant Work Allowance equal to Five Dollars (\$5.00) per square foot of Gross Rentable Area in the Demised Premises (the "**Deferred TIA Portion**"). In the event that Tenant timely delivers a Partial Deferral Notice to Landlord, then (i) provided there is then no default by Tenant under the Lease, Landlord shall make the Deferred TIA Portion available to Tenant for improvements which Tenant desires to make to the Demised Premises during the sixth (6th) year of the Term following the Lease Commencement Date, the distribution of which shall be in accordance with Landlord's reasonable disbursement procedures and requirements, (ii) as used in this Lease, the term "**Tenant Work Allowance**" shall mean and refer to an amount equal to Eighty-Two Dollars (\$82.00) per square foot of Gross Rentable Area in the Demised Premises and (iii) Landlord and Tenant shall enter into an amendment to this Lease to effectuate the provisions of this Paragraph 11.



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EXHIBIT C

RULES AND REGULATIONS

The following rules and regulations have been formulated for the safety and well-being of all tenants of the Building. Subject to the provisions of Tenant's Lease, strict adherence to these rules and regulations is necessary to contribute to each tenant's occupancy in the Building. Repeated or continuing violations of these rules and regulations by Tenant after written notice from Landlord shall be sufficient cause for Landlord to shorten the cure period for any future violation by Tenant.

1. No part or the whole of the sidewalks, plaza areas, entrances, passages, courts, elevators, vestibules, stairways, corridors, or halls of the Building or the Real Property shall be obstructed or encumbered by any tenant or used for any purpose other than ingress and egress to and from the space demised to such tenant. 2. No awnings or other projections shall be attached to the outside walls or windows of the Building. No curtains, blinds, shades, or screens (other than those that may be furnished by Landlord) shall be attached to or hung in, or used in connection with, any window or door of the space demised to any tenant, without the written consent of Landlord. No satellite dishes, antennas, or any other objects shall be affixed or placed on the roof of the Building or any other area on the Property without prior written approval from Landlord; in the event of a violation of the foregoing, Landlord may remove same without any liability and may charge the expense incurred by such removal and/or in connection with same to the Tenant.
3. No sign, advertisement, object, notice, or other lettering shall be exhibited, inscribed, painted, or affixed on any part of the outside or inside of the space demised to any tenant or of the Building or the Real Property. In the event of any violation of the foregoing, Landlord may remove and dispose of same, at Tenant's cost, without prior notice to Tenant.
4. No showcases or other articles shall be put in front of or affixed to any part of the exterior of the Building, nor placed in the halls, corridors, vestibules, or other public parts of the Building. In the event of any violation of the foregoing, Landlord may remove and dispose of same, at Tenant's cost, without prior notice to Tenant.
5. The water and wash closets and other plumbing fixtures shall not be used for any purposes other than those for which they were constructed, and no sweepings, rubbish, rags, or other substances (including, without limitation, coffee grounds) shall be thrown therein. Tenant shall share the rules/regulations set forth herein on this **Exhibit C** with its employees and invitees, and any damages resulting from same shall be borne by Tenant.
6. No tenant shall bring or keep, or permit to be brought or kept, any inflammable, combustible, or explosive fluid, material, chemical, or substance in or about the space demised to such tenant, except that Tenant shall be permitted to use and keep in the Demised Premises such cleaning, copier and other supplies as are reasonable and customary for office use, provided that Tenant uses, stores and disposes of same in accordance with applicable laws, rules or regulations.
7. No tenant shall mark, paint, drill into, or in any way deface, any part of the Building or the space demised to such tenant. No boring, cutting, or stringing of wires shall be permitted.
8. No cooking shall be done or permitted in the Building by any tenant. No tenant shall cause or permit any unusual or objectionable odors to emanate from the space demised to such tenant.
9. Neither the whole nor any part of the space demised to any tenant shall be used for manufacturing, for the storage of merchandise, or for the sale of merchandise, goods, or property.
10. No tenant shall make or permit to be made any unseemly or disturbing noises or disturb or interfere with other tenants or occupants of the Building or neighboring buildings or premises whether by the use of any musical instrument, radio, television set, or other audio device, unmusical noise, whistling, singing, or in any other way. Nothing shall be thrown out of any doors, windows, or skylights or down any passageways.
11. No additional locks or bolts of any kind shall be placed upon any of the doors or windows in the space demised to any tenant, nor shall any changes be made in locks or the mechanism thereof without Landlord's consent, and Tenant shall provide Landlord with access keys or cards to all areas of the Demised Premises. Each tenant must, upon the termination of his tenancy, restore to Landlord all keys to offices, storage, and toilet rooms, either furnished to or otherwise procured by such tenant, and in the

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Exhibit C, Page 2

event of the loss of any such keys, such tenant shall pay Landlord the reasonable cost of replacement keys.

12. All removals from the Building, or the carrying in or out of the Building or the space demised to any tenant of any safes, freight, furniture, or bulky matter of any description must take place during such hours and in such manner as Landlord or its agents may determine from time to time. Landlord reserves the right to inspect all freight for violation of any of these rules and regulations or the provisions of such tenant's lease.
13. No tenant shall use or occupy or permit any portion of the space demised to such tenant to be used or occupied for the storage, manufacture, or sale of liquor, narcotics, explosives, firearms, contraband of any kind, or drugs. No tenant shall engage or pay any employees in the Building except those actually working for such tenant in the Building, nor advertise for laborers giving an address at the Building.
14. Landlord shall have the right to prohibit any advertising by any tenant which in Landlord's opinion tends to impair the reputation of the Building or its desirability as a building for offices, and upon notice from Landlord, such tenant shall refrain from or discontinue such advertising. In the event of any violation of the foregoing, Landlord may remove and dispose of same, at Tenant's cost, without prior notice to Tenant.
15. Landlord reserves the right to control and operate the public portions of the Building and the public facilities, as well as facilities furnished for the common use of the tenants, in such manner as it deems best for the benefit of the tenants generally, including, without limitation, the right to exclude from the Building (at all times, or at such times as Landlord determines appropriate), all persons who do not have authorization by Landlord or other suitable identification satisfactory to Landlord. No tenant shall permit the visit to the common areas in the Building of persons in such numbers or under such conditions so as to interfere with the use and enjoyment by other tenants of the entrances, corridors, elevator and other public portion or Common Facilities in the Building.
16. Each tenant, before closing and leaving the space demised to such tenant at any time, shall see that all entrance doors are locked.
17. No space demised to any tenant shall be used or permitted to be used for lodging or sleeping or for any immoral or illegal purpose.
18. The requests of tenants will be attended to only upon application at the office of Landlord. Building employees shall not be required to perform and shall not be requested by any tenant to perform any work unless under specific instructions from the office of Landlord.
19. Canvassing, soliciting, and peddling in the Building are prohibited, and each tenant shall cooperate in seeking their prevention.
20. There shall not be used in the Building, either by any tenant or by its agents or contractors, in the delivery or receipt of merchandise, freight or other matter, hand trucks or other means of conveyance except those equipped with rubber tires, rubber side guards, and such other safeguards as Landlord may require.
21. No animals of any kind shall be brought into or kept about the Building by any tenant, excluding "seeing-eye" dogs.
22. No tenant shall place or permit to be placed on any part of the floor or floors of the space demised to such tenant a load exceeding the floor load per square foot which such floor was designed to carry and which is allowed by law. Proper precaution and protective measures, including floor protection, will be taken prior to moving heavy items.
23. Landlord reserves the right to specify where in the space demised by any tenant business machines and mechanical equipment shall be placed or maintained in order, in Landlord's judgment, to absorb and prevent vibration, noise, and annoyance to other tenants of the Building.
24. No vending machines shall be permitted to be placed or installed in any part of the Building by any tenant (except Tenant shall be entitled to install in the Demised Premises vending machines for the sale of food and beverages to its employees). Landlord reserves the right to place or install vending machines in any of the common areas of the Building.
25. No bicycles, motorcycles, or vehicles of any kind are permitted in the Building (unless in an area pre-authorized in writing by Landlord) or to be attached to any part of the Building rails, doors, etc. 26. No deliveries, move-ins, or move-outs are permitted through Building entrances. All such activities must take place through the loading zone in the rear or through a loading dock, if any, of the Building.
27. Landlord shall determine from time to time the hours during which tenants and their employees can access the Building only through key or card key access. Such hours are currently from 7:00 p.m. to 7:00 a.m., Monday through Friday, and 24 hours per day on Saturdays, Sundays and holidays.

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Exhibit C, Page 3

28. No building doors shall be propped open at any time.
29. All tenants shall be fully responsible and liable for the actions of all persons for whom they authorize access into the Building.
30. All floor access plates and panels shall remain exposed for easy access. In instances where plates or panels have been covered by carpet or flooring, and access is necessary, it shall be the respective tenant's responsibility to pay for removal and replacement of carpet or flooring to provide the needed access.
31. Landlord will purchase and install light bulbs and tubes for building standard fixtures only. Tenants shall be responsible for purchasing and storing of any non-building standard bulbs. Landlord will install these bulbs upon request.
32. No cars shall be parked at any time in the loading zone entrance or ramp area without the prior approval of Landlord.
33. Except as otherwise provided in the Lease, no alterations to tenant space shall be made by Tenant without the prior written approval of Landlord.
34. Landlord reserves the right, at any time and from time to time, to rescind, alter, or waive, in whole or in part, or add to, any of the Rules and Regulations when it is deemed necessary, desirable, or proper, in Landlord's judgment, for its best interests or for the best interests of the tenants.
35. **SMOKING IS PROHIBITED WITHIN ANY PORTION OF THE BUILDING, WITHIN TEN (10) FEET OF THE EXTERIOR OF THE BUILDING, THE LOADING DOCK, OR GARAGE.**
36. Drapes and blinds in the Demised Premises visible from the exterior of the Building or from the common areas of the Building shall be cleaned at least once a year.
37. Tenant shall maintain non-standard suite finishes such as kitchens, bathrooms, wallpaper, special lights, etc., except upon prior arrangement with the Landlord.
38. Tenant shall alert Landlord immediately upon the discovery of water leaking or collecting anywhere in the Building, and of any fires, bomb threats, unauthorized intruders or any other emergency,
39. Tenant will not tamper with the sprinklers or fire alarm system in the Building.
40. Storage rooms may not be used for offices or as service rooms for copiers and other office equipment.



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EXHIBIT D

FORM OF FIRST AMENDMENT TO LEASE

THIS FIRST AMENDMENT TO LEASE is entered into this ____ day of _____, _____, by and between _____ ("Landlord") and _____ ("Tenant").

WITNESSETH:

WHEREAS, on _____, _____, Landlord and Tenant entered into a lease (the "Lease") covering certain premises located on the _____ (____) floor of the office building located at _____ (the "Demised Premises"), as outlined on Exhibit A to the Lease; and

WHEREAS, Section 2(c) of the Lease requires Landlord and Tenant to execute an amendment to the Lease setting forth the Lease Commencement Date, the Lease Expiration Date and facsimile number at the Demised Premises.

NOW, THEREFORE, in consideration of the foregoing, of the mutual promises of the parties hereto contained herein, and of other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties hereto agree to amend the Lease as follows:

1. In accordance with the provisions of Section 2(c) of the Lease, Landlord and Tenant hereby confirm that _____, _____ is the Lease Commencement Date, that _____, _____ is the Lease Expiration Date and that _____ is the facsimile number of Tenant at the Demised Premises.
2. Terms not defined herein shall have the meaning provided therefor in the Lease.
3. Except as provided herein, all other terms and conditions of the Lease remain in full force and effect.

The foregoing First Amendment is hereby agreed to by Landlord and Tenant who have executed this First Amendment to Lease as of the date first above written.

TENANT:

By: _____
Name:
Title:

LANDLORD:

By: _____
Name:
Title:

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EXHIBIT E

RULES FOR CONTRACTORS

1. Any Contractor performing construction related work within any portion of the Building must be licensed and insured in the jurisdiction in which the Building is located. Proper confirmation of Contractor's insurance must be submitted to Landlord prior to initiation of work. Every Contractor must comply with permit regulations as governed by the jurisdiction in which the Building is located.
2. All demolition and/or construction work generating sufficient noise to disturb Building occupants (e.g., core drilling, Building x-rays, and ramset shots) must be scheduled with Property Management at least 72 hours in advance and accomplished before or after normal operating hours as established from time to time by Property Management. Determination of sufficient noise levels to cause a disturbance shall be made at the Landlord's and/or Property Manager's sole discretion. All penetrations to slab materials require the review and approval of the Landlord's structural engineer, without exception. The cost of this review and approval is the Contractor's responsibility. When performing Building x-rays, Contractor must take adequate precautions, including, without limitation, posting signs and/or employees to alert Building tenants and personnel of the on-going x-rays.
3. Loading dock and freight elevator use for the delivery of materials and/or equipment or the removal of trash shall be before or after normal operating hours as established from time to time by Property Management and shall be scheduled in advance with the Property Manager. As loading dock availability and freight elevator access are limited due to high demand, Contractor must schedule deliveries and removal of trash in advance with Property Management. Contractor shall protect elevator interior finishes when using freight elevator and shall use appropriate materials to protect the loading dock floor and service corridors. Use of passenger elevators and lobby areas for delivery/removal of materials is strictly prohibited.
4. Construction debris, general construction equipment and materials, etc., must be removed from the Building in suitable containers. Removal must be accomplished in a manner which does not cause damage to the Building, create any disturbances to tenants, or create additional cleaning for Building personnel. Sufficient precautions must be taken to protect finishes in the path of removal. Damages resulting from negligence will result in an assessment to the Contractor for damages.
5. Contractor is responsible for timely cleaning of all public areas affected by their construction activities. Contractor is further responsible for providing and promptly removing its own trash containers.
6. Any work not to be installed in strict adherence with the Contract Documents previously approved by Landlord must be approved by the Landlord prior to installation.
7. All workmen must conduct themselves in a professional manner at all times. Workmen are permitted access to the designated floor(s) where construction activity is occurring. Access to any other portions of the Building is strictly prohibited. The removal of any workmen using profanity, loitering in the Building, or creating a disturbance to tenants will be required. **SMOKING IS PROHIBITED WITHIN ANY PORTION OF THE BUILDING, LOADING DOCK, OR GARAGE.**
8. All of the Contractor's personnel are responsible for their own parking and the associated cost. Unauthorized vehicles found in loading areas or parking garages will be ticketed and towed.
9. All work requiring connection to the Building fire alarm system is subject to the Landlord's requirements. The completion of the tie-in must be accomplished utilizing the Landlord's specified contractor. Any warranties voided as a result of the Contractor's or subcontractor's failure to comply with this requirement will result in the Contractor's replacing the voided warranty in compliance with the Landlord's requirements.
10. Any roof penetrations required must be performed and repaired by the Landlord's designated subcontractor. Any warranties voided as a result of failure to comply with this requirement will result in the Contractor's replacing the voided warranty in compliance with the Landlord's requirements.

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Exhibit E, Page 2

11. Any work requiring the partial or full shutdown of any base Building systems, including electrical, mechanical or plumbing, must be scheduled with and approved by the Property Manager at least 72 hours in advance. The shutdowns generally must be done on Monday through Friday between 8:00 p.m. and 6:00 a.m. or on Saturday after 3:00 p.m.
12. All painting utilizing oil-based or polymer-based paints shall be scheduled in advance with Property Management and performed before or after normal operating hours as established from time to time by Property Management. Property Management shall have the right, in its sole and absolute discretion, to require that application of oil-based products be confined to weekends. The Contractor shall be responsible for scheduling with the Property Manager any HVAC required for proper ventilation of work areas and adjacent tenant spaces. Costs to provide additional heating and ventilation shall be charged directly to the tenant for whom Contractor is providing the work.
13. The protection of existing mechanical equipment, including but not limited to baseboard heaters, heat pumps, air handlers, air conditioners, ductwork and distribution equipment, from physical damage or damage from dust and debris is the responsibility of the Contractor. Damage as a result of failure to protect equipment will result in an assessment against the Contractor for such damages and the resulting required repairs.
14. All testing of fire alarm equipment requiring the sounding of bells, sirens, or voice annunciation must be scheduled with the Property Manager 48 hours in advance of the test. Pre-testing of new fire alarm work is mandatory. Rescheduled test as a result of the Contractor's failure to coordinate with the Property Manager, the Contractor's failure to completely pre-test the system, or the Contractor's failure to pass municipal test shall be the Contractor's responsibility.
15. All door locking devices and related keying systems shall conform to the Building standard hardware and keying system.
16. These rules are subject to change at the Landlord's discretion.

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EXHIBIT F

FORM OF LETTER OF CREDIT

[Lending Institution Name]
[Address of Lending Institution]

Date: _____, 200__

IRREVOCABLE STANDBY LETTER OF CREDIT NO. _____

Account Party: [Account Party's Name]
[Account Party Address]

In favor of Beneficiary: [Beneficiary Name], its successors and assigns
[Beneficiary Address]

AMOUNT
USD _____
[Dollar Amount] U.S. Dollars Only

EXPIRATION DATE:
[Expiration Date]

Gentlemen:

We hereby open our irrevocable letter of credit in your favor for an amount of USD [Numeric Dollar Amount] ([Alphabetic Dollar Amount] U.S. Dollars Only) available by your draft at sight drawn on the [Lending Institution Name, Lending Institution Address], bearing the clause "Drawn under [Lending Institution Name] Letter of Credit No. _____ dated _____, 200__," and accompanied by the following document:

Beneficiary's signed statement stating that: "The undersigned Beneficiary is entitled to draw upon this Letter of Credit pursuant to the terms of that Lease dated [Lease Date] for premises at [Premises Address] between [Tenant Name] and [Landlord's Name] for the amount drawn hereunder. Beneficiary hereby makes demand for the payment of _____ (\$_____) from the Letter of Credit." Such statement shall be conclusive as to such matters.

Partial and multiple draws hereunder are permitted. This Letter of Credit is transferable by Beneficiary. This Letter of Credit sets forth in full the terms of our undertaking and such undertaking shall not in any way be modified, amended, or amplified by reference to any document(s), instrument(s), contract(s), or agreement(s) referred to herein or in which this Letter of Credit relates, and any such reference shall not be deemed to incorporate herein by reference any document(s), instrument(s), contract(s), or agreement(s).



It is a condition of this Letter of Credit that it shall be deemed automatically extended without amendment for one year from the present or any future expiration date of this Letter of Credit unless at least sixty (60) days' prior to the then current expiration date we notify the Beneficiary by registered letter, at the above address (or such other address of which you notify us in writing), that we elect not to consider this Letter of Credit renewed for such additional period. If such notice is given, then during such notice period (i.e., at least sixty (60) day period commencing on the date of such notice and ending with the then applicable expiration date of this Letter of Credit), this Letter of Credit shall remain in full force and effect and Beneficiary may draw up to the full amount of the sum when accompanied by your draft drawn on us at sight as described above in the first paragraph of this Letter of Credit.

We hereby engage with you that drafts drawn and presented in compliance with the terms of this credit will be immediately honored by us if presented at any of our offices on or before Expiration Date, as such date may be extended pursuant to the terms hereof.

This Letter of Credit is subject to The Uniform Customs and Practice for Documentary Credits (1993 Revision), International Chamber of Commerce Publication No. 600, which is incorporated by reference herein.

Very truly yours,

Authorized Signature



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RIDER 1

RENT ABATEMENT

The monthly installments of Base Rent for the Demised Premises otherwise due and payable for the first twelve (12) full calendar months following the Lease Commencement Date shall be abated (the "**Rent Abatement**").

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Landlord	Tenant
	

RIDER 2

EXTENSION OPTION

A. Tenant shall have the option (the "Extension Option") to negotiate to extend the Term for an additional period of five (5) consecutive years (the "Extension Period"), provided that (i) Tenant gives written notice to Landlord of its election to exercise such extension option no earlier than sixteen (16) months and no later than twelve (12) months prior the expiration of the initial Term, (ii) Tenant has not assigned the Lease (other than to a Qualified Tenant Affiliate) and is then in possession of and occupying at least ninety percent (90%) of the Demised Premises, and (iii) no default exists at the time of the exercise of such option, and no event exists at the time of the exercise of such option, which event by notice and/or the passage of time would constitute a default if not cured within the applicable cure period. In addition, Tenant's Extension Option shall be subject to the provisions of Sections 6 and 7 of the Lease. Time is of the essence with respect to this **Rider 2**.

B. All terms and conditions of the Lease, including without limitation, all provisions governing the payment of Additional Rent, shall remain in full force and effect during the Extension Period, except that Base Rent payable during the Extension Period shall be at the current market rental rate with respect to comparable renewal terms of comparable space in the East End submarket of Northwest Washington, DC at the time of the commencement of the Extension Period (the "**Market Rate**"), as may be determined by the mutual agreement of the parties, with subsequent escalations in Base Rent thereafter to be determined by market practice with respect to comparable space therein. Landlord and Tenant shall negotiate in good faith to determine the amount of Base Rent for the Extension Period within twenty (20) days of the date of Landlord's receipt of Tenant's written notice of its election to exercise the Extension Option (the "**Negotiation Period**").

C. In the event Landlord and Tenant are unable to agree upon the Market Rate for the Extension Period within the Negotiation Period, then either Landlord or Tenant shall be entitled to elect to proceed with the binding arbitration process set forth below by delivering written notice of such election to the other party within fifteen (15) days after the expiration of the Negotiation Period. If either party timely elects to proceed with binding arbitration, then the Base Rent for the Extension Period shall be the Market Rate determined by binding arbitration in accordance with the following procedures. Within fifteen (15) days after either party first delivers notice to the other party of its election to proceed to binding arbitration, Landlord and Tenant shall each select a real estate broker (based on the criteria set forth in Paragraph D below). Within twenty (20) days of their selection, each broker shall make a written determination of the Market Rate for the Extension Period based upon comparable extension terms for comparable space in the Market Area. All determinations of the Market Rate shall be in writing. The party appointing each broker shall be obligated, promptly after receipt of the valuation report prepared by the broker appointed by such party, to deliver a copy of such valuation report to the other party. If the Market Rate determination of the broker designated by Landlord is within five percent (5%) of the Market Rate determination of the broker designated by Tenant, then the Base Rent for the Extension Period shall be the average of the two Base Rent determinations for the Extension Period. If the Market Rate determinations of these two brokers vary by more than five percent (5%), then a third broker shall be selected by the initial two brokers within fifteen (15) business days after the initial two valuation reports have been delivered to the parties (the third broker also having the qualifications set forth in Paragraph D below). If a third broker is appointed, the third broker shall review the valuation reports of the initial two brokers and select the one of the initial two valuation reports that reflects such criteria for the Market Rate for the Extension Period. The third broker shall promptly deliver a report of his/her determination to each of the parties. The determination of the Market Rate for the Extension Period pursuant to this Paragraph C shall be binding upon Landlord and Tenant. The expenses of each of the first two brokers appointed under this Paragraph C shall be borne by the party appointing such broker. The expenses of the third broker appointed under this Paragraph C shall be paid one-half (½) by Landlord and one-half (½) by Tenant.

D. The real estate brokers selected by Landlord and Tenant shall have the following qualifications: (i) must be an independent and licensed real estate broker in Washington, D.C.; (ii) must have a minimum of ten (10) years' experience in commercial office leasing in Washington, D.C.; (iii) must be an active broker in Washington, D.C. and known for commercial office expertise; (iv) must have experience representing both

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Landlord <i>EG</i>	Tenant <i>MPC</i>



Rider 2, Page 2

landlords and tenants; (v) in the case of the third broker only, is not then representing either Landlord or Tenant; and (vi) in the case of the third broker only, shall not have been involved in any disputes with Landlord, Tenant or any of the other brokers. In the event that real estate brokers with the qualifications described in this Paragraph D are unavailable, qualified consultants with similar qualifications may be substitutes.

E. An amendment modifying the Lease to set forth the Base Rent for the Demised Premises during the Extension Period shall be executed by Landlord and Tenant within ten (10) days of the parties' agreement or, if applicable, within ten (10) days of the determination of the Base Rent by the brokers pursuant to Paragraph C above. In the event that (i) Tenant and Landlord fail to agree on the Base Rent for the Extension Period within the Negotiation Period, and neither Landlord nor Tenant timely elects to proceed with binding arbitration, or (ii) any of the conditions set forth in Paragraph A above are not satisfied, then the Lease shall end on the Lease Expiration Date, unless earlier terminated in accordance with the terms thereof.

F. Notwithstanding anything to the contrary contained in this **Rider 2**, the foregoing Extension Options shall be personal to Council of Great City Schools and cannot be exercised by any assignee (other than a Qualified Tenant Affiliate), subtenant or any other person or entity.*

G. Notwithstanding anything contained in the Lease to the contrary, Landlord shall have the right (the "**Extension Option Termination Right**") in its sole discretion to terminate this Extension Option if Landlord anticipates that it will undertake a renovation to the Building at any time during the Extension Period. The Extension Option Termination Right shall be exercisable by Landlord providing to Tenant written notice thereof within thirty (30) days after Tenant exercises the Extension Option or at any time prior to Tenant exercising the Extension Option. If Landlord exercises the Extension Option Termination Right pursuant hereto, then the Extension Option (and any exercise of the Extension Option) shall terminate and be void and of no force or effect, as if such Extension Option were never granted to Tenant. In addition, at any time during the Extension Period, Landlord shall be entitled to terminate the Term of the Lease if Landlord then anticipates that it will undertake a renovation to the Building at any time during the Extension Period, exercisable by Landlord providing to Tenant written notice thereof and notice of the date such termination shall be effective (the "**Early Termination Date**"), which Early Termination Date shall be no less than twelve (12) months after deliver of such notice of termination. If Landlord exercises such termination right, the Term of the Lease shall expire on the Early Termination Date as if such date was the date originally set forth in the Lease for expiration of the Term of the Lease.

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Landlord 	Tenant 

STORAGE SPACE LICENSE

THIS STORAGE SPACE LICENSE (this "License") is made as of the 21st day of December, 2015, by and between **NATIONAL PLACE LEASE COMPANY, LLC** ("Licensor") and **COUNCIL OF THE GREAT CITY SCHOOLS** ("Licensee").

WITNESSETH:

WHEREAS, Licensor is the owner of that certain office building located at 1331 Pennsylvania Avenue, N.W., Washington, D.C. (the "Building");

WHEREAS, pursuant to that certain Office Lease dated of event date herewith (the "Lease"), Licensor has leased to Licensee the Demised Premises located in the Building, as more particularly described in the Lease; and

WHEREAS, Licensor and Licensee have agreed to enter into a license agreement to provide for Licensee's use of certain storage space in the Building, in accordance with the terms and conditions hereinafter set forth.

NOW, THEREFORE, in consideration of the foregoing, of the mutual promises hereinafter set forth and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the parties agree as follows:

1. **Storage Space.** Licensor hereby grants to Licensee a license to use approximately two hundred eighty-seven (287) square feet of storage space (the "Storage Space") in the Building known as Storage Suite 11-B, as shown as the shaded space on Exhibit A hereto. The Storage Space shall be used only for purposes of storage in accordance with the terms hereof.

2. **License Term.** The term of this License shall commence on the "Lease Commencement Date" under the Lease (the "S.S. Commencement Date") and shall be co-terminus with the term of the Lease, unless earlier terminated in accordance with the terms hereof. In the event Licensee fails to vacate and to terminate its use of the Storage Space upon the expiration or earlier termination of the term of this License (i) Licensee shall be deemed a trespasser and Licensor may immediately remove Licensee and Licensee's property from the Storage Space and (ii) the provisions of the Lease governing holdover of the Demised Premises under the Lease shall be incorporated herein and shall apply to any holdover by Licensee of the Storage Space with the same force and effect (it being understood that all references therein to (a) "Landlord" shall mean and refer to Licensor, (b) "Tenant" shall mean and refer to Licensee and (c) "Demised Premises" shall mean and refer to the Storage Space). Notwithstanding anything to the contrary contained herein, this License shall automatically terminate in the event the Lease is terminated.

3. **Storage Space Payments.**

a. Licensee shall pay Licensor an annual fee for the use of the Storage Space in an amount equal to Fifteen Dollars (\$15.00) per square foot of the Storage Space, which fee shall be paid in monthly installments (the "Storage Space Payment") on or before the first day of each and every calendar month during the term of this License.

b. All installments of Storage Space Payments shall be payable in advance, without deduction or set-off, with the first monthly installment due and payable upon the Licensee's execution of this License, and each subsequent installment thereafter payable on the first day of each month during the License term, beginning on the first day of the calendar month after the month in which the License term commences. If the License term commences or ends on a date other than the first day of a calendar month, the Storage Space Payment for such month shall be prorated for the partial month based upon the actual number of days of such partial month.

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Licensor <i>ES</i>	Licensee <i>MC</i>

4. **Condition.** Licensee shall accept the Storage Space on the S.S. Commencement Date in its then "as-is" condition and Licensor shall have no obligation to perform, or pay for, any work, improvements, alterations or additions thereto in connection with this License or otherwise. Licensor will not provide and/or bear the expense of heat, air conditioning, humidity control, water, char service or any other utility or service for the Storage Space, provided however, Licensor at its expense shall provide electricity for the light fixture in the Storage Space.

5. **Use.**

a. Licensee agrees to use the Storage Space solely for purposes of storage in connection with Licensee's operation of its business in the Demised Premises and for no other purpose whatsoever. Licensee shall use the Storage Space strictly in accordance with the terms set forth in this License and with all applicable laws and regulations. Licensee shall maintain the Storage Space in a clean, orderly and sanitary condition, free of insects, rodents, vermin and other pests and otherwise in a condition consistent with a first-class Building. No food shall be stored in the Storage Space.

b. Licensee shall not cause or permit any flammable, combustible, explosive or hazardous fluid, material, chemical or substance to be brought or kept upon, in or about the Storage Space. Licensee shall not obstruct or encumber, or cause or permit its agents or any other person to obstruct or encumber, any fire protection or other life safety system devices located in or about the Storage Space.

c. Without limiting the generality of the foregoing, any restriction on the use of the Demised Premises set forth in the Lease shall hereby apply to the use of the Storage Space, and Licensee's use of the Storage Space shall be subject to all Building rules and regulations now in force and such other further rules and regulations as Licensor may reasonably impose from time to time.

6. **Subleasing/Assignment.** Licensee may not sublet the Storage Space or assign this License, except Licensee may assign this License to an assignee of the Lease in connection with an assignment of the Lease made pursuant to and in accordance with the terms of the Lease. If this License is assigned or subleased as set forth above, Licensee shall at all times remain liable for all obligations hereunder.

7. **Indemnity/Insurance.**

a. Except to the extent resulting from the gross negligence or intentionally wrongful acts or omissions of Licensor, Licensee hereby agrees to indemnify and hold harmless Licensor and its agents, officers, directors and employees from and against any cost, damage, claim, liability or expense (including reasonable attorneys' fees) incurred by or claimed against Licensor and its agents, officers, directors and employees, directly or indirectly, as a result of or in any way arising from the use of the Storage Space by Licensee, its agents, employees, contractors or any other persons permitted in the Storage Space by Licensee, including but not limited to, any cost, damage, claim, liability or expense arising from any violation of any zoning, health, environmental or other law, ordinance, order, rule or regulation of any governmental body or agency.

b. Licensee shall maintain at all times during the term hereof, at its sole cost and expense, insurance in an amount of not less than the amount required of Licensee under the Lease, which insurance shall also apply to the Storage Space. Any such insurance policies shall comply with the requirements of the Lease.

8. **Risk of Loss.** All property belonging to the Licensee, its agents or any other person which is placed in the Storage Space shall be and remain at the sole risk of Licensee or such agents or other person. Licensee shall maintain at all times during the term hereto, at its sole cost and expense, policies of insurance covering all property placed in the Storage Space, in an amount not less than one hundred percent (100%) of their actual replacement cost, providing protection against all risks covered by standard form "All Risk" policy, together with insurance against vandalism and malicious mischief. Any such insurance policies shall comply with the requirements of the Lease. Licensor shall not be liable for any damage to or theft or loss of property, whether caused by the bursting, leaking or overflowing of water,

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Licensor <i>[Signature]</i>	Licensee <i>[Signature]</i>

sewer or sprinkler pipes, plumbing fixtures, or any other act or thing, unless such damage to or theft or loss of such property results directly from the gross negligence or willful misconduct of Licensor, and then only to the extent that Licensee, or such agent or other person, is not compensated therefor by insurance.

9. **Damage Caused By Licensee.** All injury or damage to the Storage Space caused by Licensee or its agents, employees and invitees, shall be repaired by Licensee at Licensee's sole expense. If Licensee shall fail to make such repairs, then upon reasonable prior notice to Licensee and a reasonable opportunity to cure (not to exceed five [5] business days), Licensor shall have the right to make such necessary repairs or replacements, and any cost so incurred by Licensor in good faith shall be paid by Licensee, in which event such cost shall become payable by Licensee to Licensor with the installment of Storage Space Payments next becoming due under the terms of this License. This provision shall be construed as an additional remedy granted to the Licensor and not in limitation of any other rights and remedies which the Licensor has or may have in said circumstances.

10. **Brokers.** Licensor and Licensee each represent and warrant one to the other that if either has engaged any broker or agent in carrying on the negotiations relating to this License, it will pay any brokerage commission that is payable to said broker or agent. Licensor shall indemnify and hold Licensee harmless, and Licensee shall indemnify and hold Licensor harmless, from and against any claim or claims for brokerage or other commissions arising from or out of any breach of the foregoing representation and warranty by the respective indemnitors. Any representation or statement by a leasing company or other third party (or employee thereof) engaged by Licensor as an independent contractor which is made with regard to the Storage Space or to the rest of the Building or the property shall not be binding upon Licensor nor serve as a modification of this License, and Licensor shall have no liability therefor, except to the extent such representation is also contained herein.

11. **Entire Agreement.** This License contains and embodies the entire agreement of the parties hereto with respect to the Storage Space, except to the extent provisions of the Lease are incorporated herein, and supersedes and revokes any and all negotiations, arrangements, letters of intent, representations, inducements or other agreements, oral or in writing, with respect thereto. No representations, inducements or agreements, oral or in writing, between the parties not contained in this License, shall be of any force or effect. This License may not be modified, changed, amended, altered or terminated in whole or in part in any manner other than by an agreement in writing duly signed by both parties hereto.

12. **Breach.** If Licensee defaults under any term, condition or provision of this License, Licensor shall have all the remedies available against Licensee as "Landlord" shall have against "Tenant" under the Lease in the event of a default by Tenant under the Lease. Nothing herein shall be deemed or construed to affect, modify, rescind or alter the terms of the Lease. The sole remedy for a breach of this License by Licensor shall be cancellation of this License by Licensee. A breach of this License shall not be deemed a breach of the Lease.

13. **Definitions.** All capitalized terms not defined herein shall have the meanings ascribed to them in the Lease.

14. **Interpretation.** This License shall be interpreted in accordance with the laws of the District of Columbia.

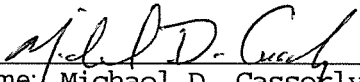
[Signatures contained on following page]

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Licensor <i>ES</i>	Licensee <i>MDC</i>

IN WITNESS WHEREOF, Licensee and Licensor have each executed this Storage Space License on the day and year hereinabove written.

LICENSEE:

COUNCIL OF THE GREAT CITY SCHOOLS


By: 
Name: Michael D. Casserly
Title: Executive Director

LICENSOR:

NATIONAL PLACE LEASE COMPANY, LLC

By: National Place Company, LLC, sole member

By: Quadrangle Development Corporation,
managing member

By: 
Name: Christopher Gladstone
Title: President

Approved by LEGAL



EXHIBIT A
STORAGE SPACE

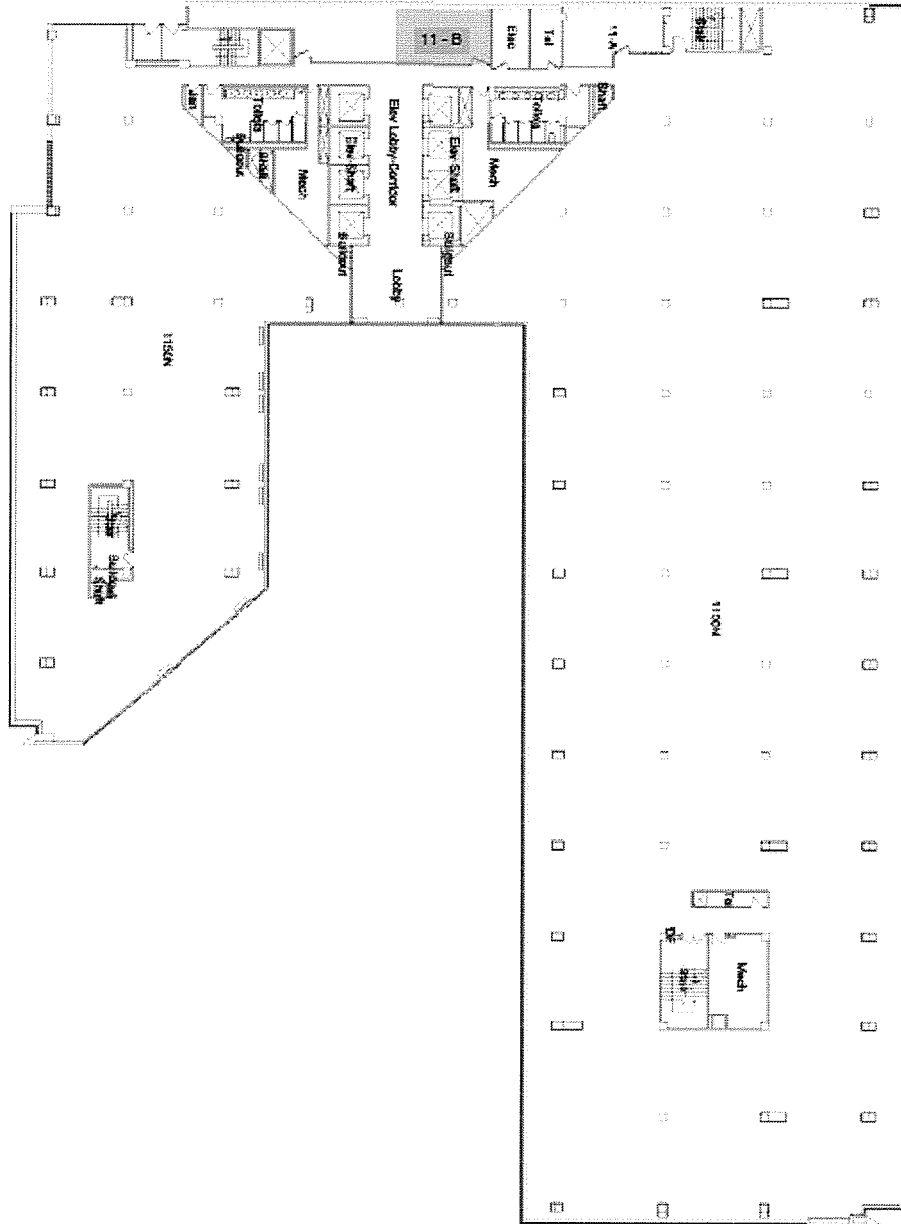


EXHIBIT A

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Licensor <i>E</i>	Licensee <i>NRK</i>