

Taking Advantage

The Rural Competitive Preference in the Investing in Innovation Program

Rural School and Community Trust

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Executive Summary



The Investing in Innovation (i3) program is a U.S. Department of Education competitive grant program supporting innovation in public schools. To encourage projects focusing on rural education in its first round of grants in 2010 the Department offered two bonus points in the scoring system for “projects that would implement innovative practices, strategies, or programs that are designed to focus on the unique challenges of high-need students in schools within a rural [school district] and address the particular challenges faced by students in these schools.”

This report analyzes the impact of this “competitive rural preference” by examining the applications and the reader-scorers’ reviews of the 19 applicants who claimed the rural preference points, and were ultimately successful in securing an i3 grant. This report does not address the question of whether the applicants should have been awarded a grant, but only considers whether the rural claim was well-made by the applicants and well-evaluated by the readers.

Of 1,698 applications received by the Education Department, 652 (38%) made the rural competitive preference claim (“the claim”). Among the 49 grant recipients, 19 (39%) made the claim.

Most applicants making the claim propose using innovations that did not originate in rural schools and have had little or no prior use in rural schools. Although some proposals pledge to adapt the innovation to rural contexts, most are vague about this process. Some explicitly insist that the innovation not be adapted in any way, for the sake of fidelity to research design.

Only two proposals are designed to operate entirely in rural schools. For most, the proportion of the total project effort that is rural-focused is small relative to the scale of the project, or too indeterminate to be estimated. In one instance there was actually no intent to engage in any rural school district.

Two-thirds of the potential rural points were awarded by the readers who scored these 19 proposals. In many cases, readers made little or no effort to explain the basis for their scoring decisions and in most cases there was little evidence that readers gave attention to the requirement that innovations be designed to address “unique challenges” of rural students or schools.

In 15 of the 19 proposals, nothing in the readers’ comments indicates that the readers verified or even made note of the i3 requirement that at least one school district served by an applicant claiming the rural preference points be eligible for the Rural Education Achievement Program.

Our search for i3 proposals that were authentically rural -- that is, were based on innovations that are expressly applicable in rural settings, were clearly focused on rural schools, and would serve the kinds of high-needs rural schools specified in the final Education Department rule governing the i3 competition --was disappointing. In our judgment, only three proposals reach that level of rural centeredness. What we found much more of were proposals of urban origin and design, centered in urban institutions or organizations, serving primarily urban schools, reflecting little thought about rural context, and involving little more than enough rural participation to justify making the rural claim.

The high expectations established by the requirement that proposals making the rural claim be designed

to address unique challenges of high-needs rural schools and students were essentially undermined by four factors.

1. The low threshold of effort required to qualify as serving a rural constituency was an inducement to token rural inclusion in otherwise substantially urban proposals.
2. The fact that the rural claim was worth twice as much as any other competitive preference made it even more attractive to chase these points.
3. The failure to establish a scoring rubric by which readers should assess whether the proposal met the rural claim made it pliable to nearly any purpose. Unguided by such a rubric, many readers were too willing to award rural points on the flimsiest of evidence.
4. Most readers probably lacked rural experience, let alone expertise. This may be attributable in part to the paucity of rural education research in the United States. Coupled with a widely held point of view that challenges in rural education are not materially different from those in urban education, this lack of rural familiarity meant that for many readers, the bare minimum requirement that at least one rural school district be served was enough to earn the rural points.

Many of these applicants were simply taking advantage of the rules of the game. And the referees were ill-prepared to call fouls.

A better approach to the challenge of high-needs rural schools and their students might be setting aside a pool of funds for competition among similarly situated high-needs rural districts, giving priority to proposals in which the lead applicant is a rural district or a collaboration of rural districts rather than a non-profit or an institution of higher education. A program of “prior support” could be offered to help these districts before and during the application stage, including assistance in drafting and revising proposals and especially providing a research support capacity to help applicants design good research and find researchers who can do the supporting research. We need to invent a better national rural education research capacity, and i3 could play an important role in helping to do so.

Rural schools exist in a context that is fundamentally different from the urban context that draws most of the attention of education policy makers and scholars. Certainly, rural students and educators share many challenges common to the education process everywhere. But they also face unique challenges. Those are the challenges that proposals claiming the rural competitive preference in i3 were supposed to address. With only a few exceptions, they did not. Open competition is not the best way to encourage educational innovation in a rural context. “Making rural matter” in the quest for innovation will require greater attention to the distinct character of rural communities in our society, as well as greater reliance on rural people for their own ideas and for the ways by which ideas from elsewhere might be best adapted to their needs.

Taking Advantage

The Rural Competitive Preference in the Investing in Innovation Program

The Investing in Innovation (i3) program is a federal competitive grant program supporting innovation in public schools implemented in 2010. The scoring system used to make grant awards included a series of four “competitive preference” categories – additional points that could be earned if the proposed project served certain populations. The purpose of the competitive preference bonus points was to attract proposals to challenging areas of need that might not otherwise be well addressed in a competitive setting. One of competitive preferences was for projects serving high-needs “rural” school districts.

When the highest scoring applicants for the i3 competitive grants program were announced, we were eager to find out how many projects would serve high-needs rural areas and whether the rural competitive preference had been effective in attracting high-quality rural proposals. So we looked at the highly rated¹ applicants who had claimed the rural competitive preference points to assess the extent and nature of their rural program.

The proposal abstracts initially posted on the Department of Education website, did not yield much detail about the proposed rural work, but there was one listed as claiming the rural competitive preference points that surprised us. The Board of Education of the City of New York had claimed the rural competitive preference for a project the abstract indicated would operate entirely within the five boroughs of New York City. How can a project operate entirely in New York City and serve high-needs students in rural schools? Of course, just because a highly rated project claims the rural preference points does not mean it got them. But the Education Department’s reader score sheets indicated that this proposal *did* earn rural preference points from two of three readers.

When additional materials were posted for highly rated proposals, we decided to take a systematic look at the proposals that claimed the rural competitive preference to see how the claim was made and applied. Our concern was not whether projects that were highly rated deserved that rating, but only whether their rural preference claim was well made and well evaluated. This report presents the result of our inquiry.

The Rural Competitive Preference

The Rural Competitive Preference as published in the final rule governing the competitive grants process reads as follows:

Competitive Preference Priority 8--Innovations That Serve Schools in Rural LEAs

We give competitive preference to applications for projects that would implement innovative practices, strategies, or programs that are designed to focus on the unique challenges of high-need students in schools within a rural LEA (as defined in this notice) and address the particular challenges faced by

¹ The term “highly rated” was initially applied by the Education Department only to the 49 proposals that, upon satisfaction of certain requirements (such as raising matching funds) were qualified to receive an i3 grant. It has since been broadened to include a so-called “second tier” of proposals. Throughout this report, we refer to “highly rated” as the initial 49 scheduled to receive grants.

students in these schools. To meet this priority, applications must include practices, strategies, or programs that are designed to improve student achievement or student growth, close achievement gaps, decrease dropout rates, increase high school graduation rates, or improve teacher and principal effectiveness in one or more rural LEAs.

Up to two points could be awarded for proposals that met this competitive preference. The other three competitive preferences (for proposals serving early learning, college access/success, or unique learning needs) each carried the possibility of only one bonus point.

Our Review Design

We read all of the documents posted on the Department's website for each of the proposals that claimed the rural preference. These documents included the proposal narrative, an abstract that included some minimal information about the budget, and the comments from three subject matter readers and two technical readers who reviewed and scored the applications. In no case were detailed budgets available. In some cases, narrative content was redacted, presumably to protect some proprietary interest.

In reviewing these documents, we were interested in assessing, as best we could, whether the rural competitive preference had the effect of attracting authentically rural proposals, that is, proposals that are based on innovations that are expressly applicable in rural settings; are clearly focused on rural schools; and serve the kinds of high-needs rural schools specified in the final rule governing the i3 competition. In short, we wanted to know if the preference was successful in meeting the Education Department's expectation that it would generate projects "...designed to focus on the unique challenges of high-need students in schools within a rural LEA ... and address the particular challenges faced by students in these schools." We also wanted to know whether the review process was diligent in addressing these issues and resulted in rural competitive preference point awards that were justified based on the evidence available to the readers.

To make these assessments, we considered five factors.

The Innovation. We interpret the language in the competitive rural preference to mean that in order to win rural preference points, the subject innovation must be deliberately designed (or redesigned) to address challenges that are inherent in rural conditions rather than challenges that are universal in schools throughout the nation.

The Extent Rural. The availability of rural competitive preference points might tempt some applicants otherwise focused mainly or entirely on urban or suburban schools to add a marginal, even minimal, rural effort to their application. So we examined the extent to which proposals claiming the rural preference points were actually focused on rural schools.

The Substance of the Claim. We wanted to know if the claim was deliberately presented and supported by substantive information in the proposal. We expected the proposal to commit to direct engagement in a rural school or district, to identify that district or schools, and to document that the district is eligible for one of the two Rural Education Achievement Programs (REAP) that the final regulation established as the definition of a "rural LEA." We also wanted to independently verify that the named rural districts to be served are, in fact, REAP-eligible districts.

We also wanted to know the extent to which the applicant has experience in significantly



Uniquely Rural Challenges

Although rural schools share many characteristics with schools in other locations, they operate in fundamentally different contexts that produce unique challenges of the kind the rural competitive preference was supposed to encourage applicants to address.

Consider small, rural school districts serving high-needs students in communities with a weak property tax base in a state with an inadequate school finance system. Here are some of the challenges these school districts face in just one area: hiring and retaining high quality teachers, an area that powerfully affects student outcomes and that districts are supposed to be able to address:

- ◆ Salaries are lower, benefits are trimmer, and there are fewer summer job opportunities than for teachers in larger communities.
- ◆ Teachers are supported by fewer aides, special services providers, and support personnel.
- ◆ Small schools and tight budgets mean small faculties and more course preparations are therefore required of each teacher.
- ◆ More course preparations mean teachers must have and maintain multiple certifications.
- ◆ There are fewer nearby professional development opportunities.
- ◆ Teachers and leaders are professionally and personally isolated. They are often the most highly educated people in the community.
- ◆ There are limited choices for housing, entertainment, and social networks, especially a factor for younger teachers.
- ◆ There is more pressure for teachers and leaders to accept co-curricular assignments.
- ◆ There are far fewer jobs for spouses in local labor markets.

These challenges mean that rural districts serving high-needs students in low-wealth communities struggle mightily to fill faculty vacancies with well-qualified teachers, and they lose many new teachers quickly to districts that do not face these challenges. An i3 proposal focused on addressing any of these challenges would have earned its rural competitive preference points.

improving student achievement, attainment, or retention, or increasing recruitment and placement of high-quality teachers and principals *in rural schools and districts*. Such experience in improving outcomes is required of all eligible applicants, and while experience in rural schools is not explicitly required of any eligible applicant, it seems to us relevant to the issue of whether an applicant claiming the rural preference points has the demonstrated experience needed to carry out a rural program. The primary obstacle to this part of the assessment was that significant content seemed to be placed in appendix items that we could not access.

The Money. We wanted to know the extent to which the federal funding would actually reach rural schools. We were particularly interested in whether rural districts were listed as official partners in the abstract, and whether there were specific allocations of funds to those districts. In the case of projects that were designed to serve non-rural as well as rural schools districts, we tried to estimate the proportion of the funds that would contribute to the rural effort. Finally, we looked to see what proportion of the budget went to non-profit lead applicants or to evaluators, and if the use of these funds could be specified.

The Review. We reviewed the subject matter and technical reader reviews to assess the level of diligence applied to the scoring of the rural competitive preference. We wanted to know not only if points were awarded, but whether the reader provided any justification for the scoring, whether the reader took care to determine if the applicant explicitly identified REAP-eligible districts in claiming the rural preference, and whether they independently verified that eligibility. We were also interested to know if the technical readers gave consideration to the issue of whether the research evidence (for Validation and Scale-up grants) or the rationale for the project based on research-based theory (for Development grants) supporting the proposal design considered the applicability of the innovation in a rural context.

An analysis of these factors should enable us to assess the use and the impact of the rural competitive preference and to understand the process by which it was implemented. We want to make it clear that we do not challenge the results of the i3 competition overall, or in the case of individual applicants, although we may question the validity of some of the points awarded for the rural competitive preference. We are concerned about whether the rural competitive preference resulted in proposals that serve high-needs rural schools well, not whether the highly rated applicants should have received grants.

Who Claimed the Rural Competitive Preference and to What Effect?

Table 1 indicates that of 1,698 applications received by the Education Department, 652 (38%) made the rural competitive preference claim (“the claim”). Thirteen of 19 (68%) Scale-up proposals, 181 of 355 (51%) Validation proposals, and 652 (35%) of the 1,324 Development proposals made the claim.

Table 1. Rural Competitive Preference Claims by Grant Category

Category	No. Proposals Submitted	No. Proposals Making the RP Claim	No. Proposals Not Making RP Claim	Percent Making RP Claim
Scale-up	19	13	6	68.4%
Validation	355	181	174	51.0%
Development	1,324	458	866	34.6%
Total	1,698	652	1,046	38.4%

Table 2 shows that among the 49 highly rated applicants, 19 (39%) made the claim.² Table 2 also shows for each grant category and for all grant categories combined the probability of being highly rated if the rural preference claim was (or was not) made. Overall, the probability of success was the same for those who made the claim and for those who did not (2.9%). But the success rate varied substantially by grant category. Nearly one third of the Scale-up proposals that made the claim were highly rated; none of the Scale-Up applicants that failed to make the claim was highly rated. Among Development Grants, the grant category offering the smallest grants, an applicant’s probability of being highly rated was only about half as high if they made the claim as it was if they did not make the claim. Validation grants were about as likely to be highly rated whether they made the claim or not.

Table 2. Probability of Success if Making (or Not Making) the Rural Competitive Preference Claim

Category	No. Making the Claim That Were Highly Rated	No. Not Making the Claim That Were Highly Rated	Probability of Success if Making the Claim	Probability of Success if Not Making the Claim
Scale-up	4	0	30.8%	0.0%
Validation	8	7	4.4%	4.0%
Development	7	23	1.5%	2.7%
Total	19	30	2.9%	2.9%

The overall percentage of applicants making the claim (38%) far exceeds the proportion of the nation’s school enrollment that is in rural districts as defined by the i3 rules, or any other measure. So the preference certainly got the attention of applicants. Including a rural component became a priority for many applicants.

However, it was not necessarily a top priority. In many cases the “rural” effort was a small, perhaps very small, part of a large project. In fact, the larger the scale of the project (and the larger the size of the requested grant) the more likely it was that an applicant made the rural claim and the more likely the project was highly rated. None of the highly rated Scale-up applicants failed to make the claim, and all of them received some additional rural points. By contrast, the rural claim was least common (35%) and least likely to be highly rated (1.5%) in the Development Grant category offering the smallest grants.

These facts raise the question of the extent to which the rural competitive preference was used to support proposals that are focused on rural education, or only to enhance those whose primary focus was elsewhere, including those “innovations” designed for use in non-rural settings. This will be a central issue as we look at the five factors in our analysis.

²The 19 highly rated proposals that made the claim are listed by applicant name and project title as they appear on the application in Appendix A. In most cases we refer in the text to the shorter of these two forms of identification, usually the name of the applicant, and we take liberties in simplifying whichever form we use to identify a proposal. So, the proposal by the Search Institute titled “Building Assets-Reducing Risks Program: Replication and Expansion of an Effective Strategy to Turn Around Low Achieving Schools” becomes simply “the Search Institute proposal.” The President and Fellows of Harvard College – Graduate School of Education becomes simply “Harvard.” Readers wanting the formal applicant name and project title should refer to Appendix A.

The Innovations

The i3 final rule requires that the innovation in an application making the rural claim be designed or adapted to meet the unique challenges of rural schools.

Very few of the innovations in the applications making the claim have origins in rural schools. The Niswonger Foundation and the University of Missouri programs are two that do. The Parents as Teachers program was co-developed in rural and urban schools in Missouri in the 1980s. We do not know whether the state legislation that launched the New Mexico innovation being validated under the Utah State University application had any particularly rural origins. The urban origins of most of the rest of the innovations for which rural preference points are claimed is very clear. So, most of the innovations involved in the highly rated proposals that made the rural claim are urban in origin.

At least four of these urban-origin innovations have, however, been previously used in rural settings, based on evidence in the documents (Success for All, Teach for America, Search Institute, and FLIGHT). The remaining proposals earning rural preference points demonstrate little evidence of prior use in rural schools.

Of the 19 highly rated proposals making the rural claim, about half attempt to define how the innovation will be applied in rural schools. This half is made up of the proposals where the innovation either originated in rural areas or has been used in rural schools, so the applicant should have some understanding of how the innovation will work in rural settings. In most of these projects, rural schools are expected to play an active role in adapting the innovation to their circumstance.

The other half of the proposals address neither the adaptability nor the suitability of the innovation to rural schools. Nor do these proposals include references to the suitability of the innovation in a rural context in the section of the proposal in which they are required to discuss the internal and external validity of the evidence supporting use of the innovation. More disturbingly, they do not propose to address any of these issues in their project's evaluation design (an important exception is the Utah State University proposal). In these projects, there is no plan to adapt the innovation to rural schools, no evidence rural schools will be asked to play an active role in any adaptation process, and no evidence that applicants are considering the impact of either rural issues or rural adaptation in the ways they assess validity of the innovation. These applicants assume, without discussion or acknowledgement of the merits of the issue, that an innovation whose origin and prior use are entirely urban (or suburban) will work just fine in a rural setting.

Where adaptation is discussed, it is frequently about using distance learning technology or locating professional development centers in rural areas. These are really just delivery mechanisms and do not address the ways in which program management, curriculum or methodologies will address real needs and circumstances in rural schools.

But there is another problem as well. Many proposals are research projects; therefore fidelity to a given intervention design is very important and adaptation to any particular setting is avoided (especially Reading Recovery and Harvard's READS project). In projects that operate in multiple settings, such fidelity requires that one size fits all. This is in itself contradictory to the i3 requirement that to earn the rural claim points, an innovation be "... designed to focus on the unique challenges of high-need students in schools within a rural LEA."

In summary, most applicants making the rural claim are using innovations that are not based in rural experiences and, although some applicants speak to the involvement of rural schools in adapting the

programs to rural areas, the proposals are almost uniformly vague about this process.

The Extent of Rural Participation

This issue was difficult to measure directly because most of the proposals were quite vague about the relative level of effort that would be placed in rural schools, especially if the standard used is schools in REAP-eligible districts.

Two proposals are clearly exclusively or primarily rural focused and are probably going to serve mostly REAP-eligible districts (University of Missouri eMINTS program and the Parents as Teachers program).³ But for most, the proportion of the total project effort that is rural-focused is highly variable and not transparent (a few proposals refer to appendix materials that might allow us to sharpen our assessment of this issue, but these materials are not available to us on the Department's website at this time). In a few cases, the effort seems to be substantial (roughly between 25% and 75% of total effort, including Niswonger Foundation, Search Institute and Plymouth Public Schools) although in none of these projects is the rural effort entirely in high-needs rural districts. In other cases, some requiring generous benefit of the doubt, the rural effort might be described as moderate (5-25% of effort, including FLIGHT, Schools to Watch, Success for All, and Utah State University).⁴

But in most cases, the proposal and abstract are vague on the extent of rural effort and even more elusive on the issue of whether the "rural" schools are in REAP-eligible districts. (We will turn later to the issue of whether the review process gave due diligence to this issue). In six cases (almost one-third of the 19 subject applications), the rural effort was described well enough to be categorized as "minimal" in proportion to the overall size of the project. This group included two of the Scale-Up projects (KIPP and Teach for America) as well as ASSET, Education Connection, ARCHES, and the Board of Education of the City of New York (where no rural effort was planned).

In three other cases there was simply not enough information to estimate the level of rural effort with any level of confidence (Reading Recovery, Harvard, and George Mason University).

Only nine of the 19 applications making the rural claim listed one or more rural school districts as official partners (more on the flow of money later).

Giving our best effort to identify specific rural schools or districts named as participants in these 19 applications, we were confidently able to list fewer than 150. Of these, 60 are from the University of Missouri eMints project, a generously estimated 28 are in the Teach for America playlist, and 24 are the Bureau of Indian Education (BIE) schools in the Parents as Teachers project. Three proposals, therefore account for 77% of the rural schools or districts we can say with confidence will participate in this round of the i3 program. The remaining proposals have between one and eight participating rural districts. Some projects pledge to include rural districts to be named later. We have no way to estimate or verify this prospective participation.

We conclude that for many of the projects making the rural claim, the rural participation is marginal or unclear at best. For some, the rural effort was probably an afterthought designed to collect some

³ Parents as Teachers will serve REAP-eligible schools in spirit if not in fact. The program will operate entirely in small, high-needs Bureau of Indian Education schools that are simply not eligible for REAP funding because they are entirely federally funded; if they were regular public schools they would all unquestionably qualify as REAP-eligible based on the facts and circumstances surrounding these schools, the communities, and students they serve.

⁴ There is nothing vague or elusive about the Utah State University proposal. It names four participating New Mexico school districts one of which is REAP-eligible.

scoring points for a project whose origin, design, and implementation would be primarily urban. In one case, the rural claim was made for a project devoid of rural participation.

Substance of Claim

Even if an innovation has not been designed or redesigned to meet unique rural challenges, and even if the rural effort is a relatively small part of an otherwise largely urban project, the rural claim might be substantiated if the applicant commits to specific actions intended to reach into rural schools, especially if the lead partner demonstrates experience in having done so. While this factor clearly overlaps with the two factors we have previously discussed, it is different because it goes to the question of whether the applicant provides evidence of having thought about what needs to be done to make its innovation work in rural schools in specific rural environments, and plans accordingly to do so.

One sign of a substantial claim would be evidence that the applicant knows that rural schools and communities are varied and complex and that it has made choices about where to take its innovation. So we looked to see if the proposal or abstract specified by name, geographic locale, demographic or other differentiating factors exactly which or what kinds of rural schools or districts would be served. We also looked to see if the applicant was conscious of the need to identify REAP-eligible districts.

All but one of the 19 applicants making the rural claim (New York City's School of One) stated an intent to work in a rural school or district, and 14 listed or partially listed either rural districts, schools or communities they plan to engage. However, only four of these 14 proposals identify any of these rural districts as specifically REAP-eligible (eMints, Utah State, Education Connection, and FLIGHT), a requirement of the proposal to award rural preference points. The rest were silent as to whether any of the rural districts to be involved in the project are REAP-eligible. When we checked districts that were named in proposals or in the abstracts, we discovered that 13 of 19 applicants did have at least one REAP-eligible district as part of the proposal. (This does not count the Parent as Teachers schools that would be REAP-eligible if they were not federally-funded Bureau of Indian Education schools.)

For several applicants, we cannot find any information about specific rural districts, and only a generalized claim that work will happen in rural areas. Four other applicants commit to working in only one named rural, REAP-eligible district. Unfortunately, this meets the minimum standard set by the i3 guidelines.

Finally, based on our analysis, only six applicants claiming rural preference points appear to have any sustained experience working in rural schools and districts. Seven have limited or very limited experience. Another six applicants appear to have no rural experience whatever, and the rural effort in their projects is to be minimal. Their sudden interest in rural schools seems opportunistic.

The Money

For most of the proposals it is very difficult to determine how much of the money will actually go for work performed in rural schools. Budgets are not provided to the public, and the best source of data is the abstract which often, but not always, lists how much money is going to official partners. Often however, the rural schools are listed as "locations," or other partners, not as "official partners," the designation that generally means they are getting direct funding under the grant.

For seven proposals it is simply impossible to estimate the portion of the budget that may actually go for work performed in rural schools. For another six, it is clearly going to be less than 10%, and in some cases nil.

One indirect indicator may be how much of the proposed grant is going to the Lead Partner. In eight proposals, half or more of the money is directed to the Lead Partner and/or the evaluator. In two cases (Teach for America and Parents as Teachers), a significant portion of the funds going to the Lead Partner will be spent by the organization to place people at work in schools. In the case of Parents as Teachers, all of this work will be in high-needs rural schools; in the case of Teach for America, it is clearly far less. For most of the others where half the money goes to the Lead Partner, the projects are either not very rural, are university research projects, or are projects that serve intermediary institutions, not schools.

The Review

The three subject matter readers commissioned with determining whether an applicant who made the rural claim received two, one, or no points awarded these 19 applicants a total of 78 points, an average of 4.1 points. Divided by three readers per proposal, this gives the average proposal a final score of 1.37 rural points out of a possible 2.0. This means that two-thirds of the rural competitive preference points claimed were awarded.

There were six proposals on which the three readers were in unanimous agreement as to score. One applicant, ASSET, received no points from any reader. This is the only claimant that did not receive any advantage by making the rural claim. Proposals that claimed the rural points had a high probability of getting some boost in their final score.

Four applicants received the maximum two points from each reader: Niswonger Foundation, Search Institute, the National Forum to Accelerate Middle School Reform, and the University of Missouri. One applicant (California Education Roundtable) received one point from each reader.

For all other applications, readers were divided on whether to give 0, 1, or 2 points for the rural claim. Table 3 shows how many applicants received each unique point configuration from the three readers who scored the rural claim.

Table 3. How Each Reader Scored Applications, by Average Number of Points Awarded

Avg. No. Points Awarded to the Applicant Per Reader	No. of Applications Receiving This Scoring Configuration	Individual Readers' Scoring Configuration
0.0	1	0,0,0
0.67	1	0,1,1
1.0	2	1,1,1
1.0	2	0,1,2
1.33	3	1,1,2
1.33	2	0,2,2
1.67	4	1,2,2
2.0	4	2,2,2

Summing the frequency of each point score awarded, there were eight zeros awarded, 20 one's, and 29 two's. Over half the reader point scores awarded were therefore the maximum score of 2.

There was extremely wide variation in the extent to which readers justified the score they awarded an applicant making the rural claim. In many cases, there were no comments whatever, or minimal ones, such as "Met criteria," or "The applicant is serving a rural LEA."

Overall, there is significant evidence that readers did not understand the criteria for awarding points for the claim or know what to say about the merit of the applicant's rural claim. For example:

- On one proposal, one reader wrote "All parts of the proposal substantively address this competitive preference," and awarded two points. Another reader wrote "The applicant did not address this competitive preference," and awarded no points. The third reader of this proposal wrote, "While the applicant provides information on how the needs of teachers in rural settings will be met, the applicant doesn't indicate how the unique needs of the students will be met," and gave one point. It is difficult to believe these three readers read the same proposal, let alone applied any common set of standards to the review of the rural claim (George Mason University).
- In the case of a Scale-Up grant proposal, a reader wrote: "Some rural LEAs are included in the project Scale-up plan...It is unclear from the narrative that all the schools involved in the Scale-up effort are rural schools." But the rural competitive preference did not require all the schools to be rural, and none of the highly rated Scale-up proposals planned to serve more than a moderate number of rural districts (Reading Recovery).
- Another reader justified giving a rural point by commenting that "...the project will support at-risk student participation." This is simply not a criterion for receiving rural competitive preference points (Success for All).

The awkwardness of some readers in justifying their scoring, and the failure of many others to make any justifying comments at all, may well reflect the lack of familiarity of the readers with rural schools. Many may not have known what to base their scoring on, and settled for any reason to believe the applicant, or no reason at all, as long as the applicant said the program would serve at least one rural district.

There were, however, some cases where the readers gave due diligence to the issue. One reader of the Teach for America proposal wrote "While serving high-needs students in rural areas is part of the model, there is little, if any, evidence provided in the proposal that discusses innovative strategies and practices designed to meet the unique needs of students in rural areas." This reader clearly knows that the language of the rural competitive preference criteria (which was included in the score sheet) requires innovations designed to meet uniquely rural needs. Nonetheless, the reader gave one point to the proposal apparently because the project would operate in rural areas, even though its program was not designed to meet unique rural needs.

In one case, the due diligence of the readers shone. For the ASSET proposal, one reader wrote: ""The applicant does not present a clear link between the [uniquely rural innovations] proposed and how the project strategies will ensure that rural teachers will get the training they offer or that establishing them will positively impact students." Another reader of the proposal noted that "In listing possible sites for the project implementation activities, the applicant shows their locations, but does not include any indicators that show which are rural and in fact, two listed are suburban locations." On this proposal, the three readers were unanimous in awarding no rural competitive points. This is the kind of due diligence

that ought to have been standard, but instead stands out as exceptional.

Inconsistent levels of attention to the merits of the rural claim were far more common. For example, in one proposal review, one reader wrote that the applicant is "attentive to the way rural schools' needs would differ from urban and suburban schools" but did not say what those differences are or how the project would address them and awarded two points anyway (Plymouth Public Schools). Another reader of the same proposal wrote that the project "specifically addresses the needs" of rural schools, but does not say in what way and awarded only one point. The third reader gave zero points commenting that the rural preference was "not addressed" by the applicant, despite the same reader having observed earlier in a comment on another scoring criteria that the project addresses the need of "supportive, collaborative professional development that is often missing in rural schools."

In the case of the Harvard proposal, a reader noted that the proposal does include a set of rural schools but the validation study offered "no detail designed specifically for rural schools." This reader awarded one point.

Nothing is more telling in the inconsistency of the due diligence given the rural claim than the case of the Board of Education of the City of New York's School of One proposal. One reader essentially scoffed at the claim, saying "The project does not serve rural schools. The fact that it could in the future is not a factor for this proposal," and gave no points. The second reader bought the applicant's argument, writing that "If this project is successful there is strong indication that it will address the unique challenges of high need students in rural schools." This reader did not say what those "strong indications" or "unique challenges" are, and only awarded one point. The third reader just blithely wrote "Criteria met" and awarded two points. This was the height of indifference to the integrity of the rural competitive preference.

There was one area where the readers were, unfortunately, usually lax. With respect to the issue of whether the rural schools or districts participating in the project met the i3 eligibility requirement that they be REAP-eligible, most readers simply failed to address the issue. They were either unaware of the requirement or simply accepted as sufficient any applicant claim that if it served a rural district, it must be a REAP-eligible district. In 15 of the 19 proposals, nothing in the readers' comments indicates that the readers verified or even made note of the i3 requirement that at least one school district served by an applicant claiming the rural preference points be eligible for the Rural Education Achievement Program.

But there were a few instances where readers did address REAP eligibility with due diligence. In the case of the Parents as Teachers proposal, one reader took note of the fact that the applicant conscientiously reported that the rural schools were *not REAP-eligible* because they are entirely federally funded Bureau of Indian Education schools, but accepted the applicant's argument (which we do as well) that the schools all meet the qualifying characteristics of the REAP program. This reader split the difference, giving the proposal one rural point. The other two readers gave two points each without commenting on the REAP eligibility issue.

In another case (Utah State University) one reader deliberately verified the REAP eligibility of the one rural district in the project, and the other two accepted the applicant's claim without verifying REAP eligibility (the district is, in fact, REAP-eligible).

In fairness to the readers, it should be noted that for most of them rural education is doubtless an enigma at best. As well, the rural competitive preference section of the review sheet was placed at the very end. A reader of multiple proposals over a short period of time might well develop "reader fatigue"

that intensifies the desire to move on to the next proposal toward the end of the present one. And there at the end of every proposal, is a topic to review that you simply do not know a lot about and that most applicants have addressed but vaguely.

Conclusions Regarding Use of the Rural Competitive Preference in i3.

Our search for i3 proposals that are authentically rural – based on innovations that are expressly applicable in rural settings, clearly focused on rural schools, and serving the kinds of high-needs rural schools specified in the final Education Department rule governing the i3 competition – was disappointing. Only three proposals, in our judgment, reach that level of rural centeredness. To be sure, there are a few other proposals that include genuinely rural participation and make some effort to respond to unique rural challenges, although it should be noted that most of these responses are to remote location and sparse population, rural circumstances most likely to be viewed as challenges from an urban-centric perspective.

What we found much more of were proposals of urban origin and design, centered in urban institutions or organizations, serving primarily urban schools, reflecting little thought about rural context, and involving little more than enough rural participation to justify making the rural claim.

The high expectations established by the stated requirement that proposals making the rural claim be designed to address unique challenges of high-needs rural schools and students were essentially undermined by four factors.

First, the low threshold of effort required to qualify as serving a rural constituency – one participating district had to be a REAP-eligible district – was an inducement to token rural inclusion in otherwise substantially urban proposals. The minimal effort required to qualify was reflected in many proposals by the minimal effort to describe the proposed rural effort, or to establish any rural “uniqueness” in the innovation.

Second, it was all the more attractive to chase these points because the rural claim was worth twice as much as any other competitive preference. A good proposal addressing one of the other competitive preferences could claim one bonus point; by throwing a few rural districts into the mix, an applicant could claim two more, and generally that is all it took to get at least one and often both rural points.

Third, the absence of a scoring rubric by which readers could assess whether the proposal met the rural claim criteria of being “designed” to focus on the “unique challenges of high-needs students” in rural schools” or “address the particular challenges faced by students in these schools” made the criteria pliable to nearly any purpose. Readers were rudderless in interpreting these words. . In fact, most proposals proceeded on the presumption that an innovation designed and applied in an urban context would universally apply in a rural context as well, or that vague promises that the applicant would see to it that they did were enough to satisfy the rural claim.

Fourth, perhaps because they were rudderless, many readers were too willing to award rural claim points. Too many made little or no justification for the points they awarded, or simply dismissed the whole issue with a casual comment that the project will include a rural district. Some offered bland comments such as “met criteria.” None of the technical readers made any comment on whether the required evidence (Scale-Up and Validation) or theoretical rationale (Development) supporting the application supported its use in a rural context.⁵ It is easy to believe no one wondered. In effect, many

⁵ However, the Parents as Teachers technical readers did examine the issue of whether the research evidence supporting the proposal was applicable to Native populations and concluded that it was.

of these points were awarded merely for the asking.

All of this suggests that readers may not have been well prepared to assess the validity of the rural competitive preference claim, not only because there was no rubric for doing so, but also because too many of them were unprepared by background and experience – expertise – to do so. While the Department sought readers with expertise in rural education, there were likely disproportionately far fewer readers with rural expertise than with any other competitive preference criteria simply because of the paucity of rural education research. Underlying the weakness of the rural reviews is the reality that for most experts in education, challenges in rural education are generally viewed as similar to those in urban education. For many readers, the mere fact that the proposal met the bare minimum requirement that at least one rural school district be served was enough to earn points. In the case of the New York City proposal, not even that was required by two of the three content readers.

In short, many of these applicants were simply taking advantage of the rules of the game. And the referees were ill-prepared to call fouls.



The Wrong Remedy for a Bigger Problem

The rural competitive preference was the wrong remedy for a problem much bigger than could be mitigated by two bonus points in a 100-point competition.

The problem is a flawed assumption that high-needs rural school districts and their students can be well-served by a national competition dominated by very large districts, institutions of higher education, and national non-profit organizations. High-needs rural districts cannot compete with those institutions and organizations, and those institutions and organizations will not often place rural needs on a par with the urban needs with which most of them are more familiar.

High-needs rural districts cannot compete meaningfully on their own terms, as lead applicants, for a number of reasons. First, they lack the internal capacity to do so. They do not have development personnel or the budget flexibility to retain consultants. This lack of capacity was most daunting with respect to the high i3 demand for research and theory based innovations because rural education research is so marginalized. Nor could high-needs rural districts easily meet the scale requirements of even the least scale-intensive of the i3 grants categories. Finally, the twenty percent matching requirement had a chilling effect on proposals from high-needs rural districts.

Ideally, some of these barriers might have been lowered by collaboration among such districts. But this would have required extensive relationship building and coordination among multiple districts, a nearly impossible strain for understaffed high needs districts. And time was extremely short. It was only a few weeks between final release of the i3 guidelines and the application due date. Even highly centralized applicants found that time constraint difficult to manage.

Last minute heroics by private philanthropy to provide technical assistance to rural applicants and to pool grant funds to meet matching requirements for successful rural projects were helpful and resulted in some authentic rural proposals. But none of those was as scored as highly-rated, although some reached the so-called “second tier” of proposals – those with raw scores over 80 but below the lowest scores of the 49 funded proposals. It would be useful to review the readers’ score sheets to find out if there were patterns in the criteria where these second tier proposals making the rural claim failed to make the final cut.

Because rural school districts could not participate alone or collectively as indigenous lead applicants,

the alternative was to accept a role as a participant in projects developed by universities and national non-profits, some of whom seem to have been lured into the rural field by the offer of two extra scoring points. The apparent assumption underlying the preference was that non-rural applicants would welcome the opportunity to work in the rural context with genuine enthusiasm for understanding and responding to unique rural challenges. Its effectiveness in producing such a response was marginal and the perverse unintended effect was to attract proposals that treated rural needs tangentially and superficially, cheapening the rural mandate. To be sure, there are a handful of highly rated proposals that met the expectation that the preference would attract genuinely rural proposals, and they constitute a sharp contrast with the failing of many of the other proposals that made the rural claim.

As a largely coincidental participant in an essentially urban project, the rural school or district's role is often marginal – sometimes as an official partner, but often not. Too often, these rural school districts are passive recipients of programs designed by others and for others, and they are expected to exercise fidelity to the project's rigorous research design so that its findings can be validated for universal scale-up. Such arrangements are squarely at odds with the rural competitive preference's requirement that innovations qualifying for the two points be designed to meet the unique challenges of rural schools and students.

In sum, the rural competitive preference criteria was ambitiously stated but poorly defined and implemented. The vagueness of the criteria and the extra value assigned to it encouraged many applicants with limited rural education experience to attach a small rural effort onto an otherwise urban program. On the other hand, the two points offered were insufficient to overcome the substantial barriers to participation by all but a few rural applicants with authentic rural proposals. Real rural proposals could earn the marginal two points on their own terms, but not enough of the base 100 points that were essential to success. On the other hand, large institutional applicants that could compete for the base 100 found it easy to score the two rural points without actually serving rural districts in a way that reflected the high sounding standards of the criteria. While some readers clearly took their job seriously with respect to the rural competitive preference, many others did not and awarded points on little more than a vague promise to serve one or a few rural districts with a program not designed to meet either their or their students' unique challenges.



Is There Another Way?

A better approach to the challenge of high-needs rural schools and their students is to place the focus on innovation rather than on competition *per se*, or more precisely, to use competition for the limited purpose it best serves – to encourage the identification or development of the best innovations explicitly designed for this targeted group of schools. It is not the purpose of this report to offer a detailed alternative to i3 for rural districts, but we offer some preliminary thoughts about measures that might spur innovation in these districts. This approach does not look much like the i3 competitive grants program as it now exists.

First, funding would be set-aside in a pool available only for projects that address the unique challenges of high-needs rural schools and districts. Segmenting the competition in this way simply recognizes that if the best innovations for high-needs rural schools are to emerge, the competition has to provide meaningful prospect for success for competitors who work for and in those schools. Leveling the playing field so that those competitors compete with similarly situated competitors increases the prospect that the best innovations designed to work in those schools will surface.

This idea of leveling the playing field is axiomatic in the principal human endeavor built on pure

competition -- sports. In all manner of athletic competition, the field is leveled by segmenting the competition by age of the athletes, size of the talent pool available to teams, and previous experience or ability of competitors. Even at the professional level, where competition is a business product, advantages are given to less competitive teams or players – first choice of new players, unbalanced schedules, divisional play, salary caps, or revenue sharing, to name a few. These devices do not reduce competition; they enhance it at every level, spread it to every level, and give everyone the opportunity to be the best they can be.

Within the set-aside pool, a further targeting device could be to give priority to proposals in which the lead applicant is a rural district or a collaboration of rural districts rather than a non-profit or an institution of higher education. In the case of a collaborative, most of the districts would be high-needs districts, but the collaborative could include some lower poverty rural districts as long as a majority of the students in the consortia are in high-needs districts. This would encourage more participation by geographically contiguous districts that might straddle the “high-needs” threshold, enabling more practical collaborative arrangements than would be possible if all districts had to meet the high-needs test.

While setting aside money and prioritizing high-needs rural district applicants would serve the purpose of enhancing competition, it is important to put greater emphasis on enhancing innovation. A program of “prior support” could be added to the grant competition to help produce strong proposals from the real experience of high-needs rural schools.

For example, the Department of Education could establish a pre-application time period to market the program to these districts through intensive workshops open to qualified districts and to help in carefully targeted sub-state regions where there are many of these kinds of districts. Twenty well-designed workshops could reach a substantial number of potential applicants in leading high-needs rural regions such as Appalachia, the Black Belt, the California Central Valley, the Hispanic Borderlands, Indian Country, the Mississippi Delta, the Northern Plains, the Ozarks, and others. Subsequently, technical Assistance could be made available during the application stage, including assistance in drafting and revising proposals.

The guidelines could also encourage and welcome, but not be limited to, indigenous innovations – practices, strategies, programs people are doing that work but may not even have a name. Part of the objective is to excavate authentic rural innovations. Small exploratory projects should be encouraged also. Far less emphasis should be placed on scale in the short run than was the case for i3.

Because there has been so little research on authentically rural innovations, the effectiveness of the innovations should be carefully evaluated during the proposed program, but the work should be innovation-driven, not research-driven. A school-based program that finds good ideas and helps people test them at a manageable scale in a rural context will do far more to identify practical innovations than a university-based program rooted in theory. The scale does not have to be any larger than that necessary to produce a satisfactory research design.

This means that the department should provide a research support capacity prior to and during the application stage, convening a committee of researchers with strong rural experience to help applicants design good research and to find researchers who can contract to do the research for successful projects. High-needs rural schools do not know and are not known by the research elite in education. We need to invent a rural education research capacity, and i3 could play an important role in helping to do so.



Making Rural Matter

Rural schools are not miniature urban schools, like them in every way but scale. They exist in a context that is fundamentally different from – neither more nor less problematic, but different from – the urban context that draws most of the attention of education policy makers and scholars. Certainly, rural students and educators share many challenges common to the education process everywhere. But they also face unique challenges. Those are the challenges that proposals claiming the rural competitive preference in i3 were supposed to address. With only a few exceptions, they did not. If the Congress and the Administration want to encourage education innovation in a rural context, open competition is hardly the way to do it. “Making rural matter” in the quest for innovation will require greater attention to the distinct character of rural communities in our society, as well as greater reliance on rural people for their own ideas and for the ways by which ideas from elsewhere might be best adapted to their needs.

Appendix A. The Nineteen Highly-Rated Proposals that Made the Rural Competitive Preference Claim

CATEGORY	Proposal	Lead Applicant	Federal Funding Requested	Absolute Priority	Score
Scale Up	Success as the Norm: Scaling-Up KIPP's Effective Leadership Development Model	KIPP Foundation -- Research Design and Innovation	\$ 50,000,000	Effective Teachers and Principals	85
	Reading Recovery -- Scaling Up What Works	Ohio University Office of Sponsored Programs	\$ 50,000,000	Persistently low performing schools	81.17
	Scale-Up and Evaluation of Success for All in Struggling Elementary Schools	Success for All Foundation	\$ 49,285,513	Persistently low performing	92.33
	Scaling Teach for America: Growing the Talent Force to Ensure All Our Nation's Students Have Access to a Quality Education	Teach for America	\$ 50,000,000	Effective Teachers and Principals	92
Validation	eMints Validation Project	The Curators of the University of Missouri -- eMINTS National Center, Academic Affairs	\$ 12,277,674	High Standards, High Quality Assessments	101.4
	The LASER Model: A Systemic and Sustainable Approach for Achieving High Standards in Science Education	Smithsonian Institution -- National Science Resources Center, LASER	\$ 25,581,105	High Standards, High Quality Assessments	101.5
	New Mexico K-3 Plus Extended School Year Validation Study	Utah State University Center for Students with Disabilities	\$ 15,282,720	Persistently low performing schools	99.08
	Northeast Tennessee College and Career Ready Consortium	Niswonger Foundation	\$ 17,751,044	High Standards, High Quality Assessments	95.53
	Improving Educational Outcomes for American Indian Children	Parents as Teachers National Center	\$ 14,253,165	Persistently low performing schools	96.5
	Project READS: Using Data to Promote Summer Reading and Close the Achievement Gap for Low-SES Students in North Carolina	President and Fellows of Harvard College -- Graduate School of Education	\$ 12,773,136	Use of Data	94.94
	ASSET Regional Professional Development Centers for Advancing STEM Education	ASSET Inc. (Achieving Student Success through Excellence in Teaching)	\$ 22,308,433	High Standards, High Quality Assessments	93.96
	Virginia Initiative for Science Teaching and Achievement	George Mason University	\$ 28,455,346	Effective Teachers and Principals	95.91
Development	The Building Assets-Reducing Risks Program: Replication and Expansion of an Effective Strategy to Turn Around Low Achieving Schools	Search Institute	\$ 4,999,711	Persistently low performing schools	108.38
	New England Network for Personalization and Performance	Plymouth Public Schools	\$ 4,992,944	High Standards, High Quality Assessments	96.26
	School of One	Board of Ed - City of NY	\$ 4,999,560	Use of data	104.18
	Schools to Watch: School Transformation Network	National Forum to Accelerate Middle School Reform	\$ 4,999,969	Persistently low performing schools	99.66
	STEM21	Education Connection	\$ 4,473,481	High Standards, High Quality Assessments	103.87
	STEM Learning Opportunities Providing Equity	California Education Roundtable Intersegmental Coordinating Committee/Alliance for Regional Collaboration to Heighten Educational Success (ARCHES)	\$ 4,982,527	High Standards, High Quality Assessments	98.96
	Facilitating Long-Term Improvements in Graduation and Higher Education for Tomorrow	Take Stock in Children, Inc.	\$ 4,999,947	Use of data	98.73



Rural School and Community Trust

Mission

The Rural School and Community Trust is a national nonprofit organization addressing the crucial relationship between good schools and thriving communities. Our mission is to help rural schools and communities grow better together. Working in some of the poorest, most challenging places, the Rural Trust involves young people in learning linked to their communities, improves the quality of teaching and school leadership, and advocates in a variety of ways for appropriate state educational policies, including the key issue of equitable and adequate funding for rural schools.

Guiding Principles

- ◆ All children have access to equal educational opportunity and treatment, regardless of where they live, the color of their skin, and the language they speak.
 - ◆ School governing bodies reflect the composition of the community the school serves and decision-making is responsibly and democratically determined for the benefit of the entire community.
 - ◆ Schools are small enough so that every adult who teaches or leads knows every student, all parties affected by important decisions have an opportunity to discuss them, and school policy is implemented by mutual consent.
 - ◆ Students' academic work helps them understand the place in which they live and helps to build a stronger and better community.
 - ◆ Students partner with adults in academic and public work in school-community interactions that are rich, complex, varied, and natural.
 - ◆ Teachers are prepared to teach in rural settings. They are open to community participation in the classroom and eager to engage their students in public work that builds community.
 - ◆ Every child's intellectual growth and academic success are valued both as personal achievements and as community assets.
 - ◆ Community-developed learning standards are integrated in the curriculum providing for challenging content, use of place as curriculum, and appropriate learning conditions including a safe environment, good facilities, and a community context.
- 