

Comments of the Council of the Great City Schools on District Race To The Top Requirements and Grant Selection Criteria

The Council of the Great City Schools, the nation's primary coalition of large urban school districts, supports the Department of Education's emphasis in the proposed District Race to the Top (D-RTTT) requirements on teaching and learning. Implementation of the rigorous Common Core Standards and their related assessments is the most critical challenge currently facing our urban schools along with ensuring that disadvantaged and minority students are learning this accelerated content at rates that will overcome persistent achievement gaps.

The four areas of reform in the RTTT authorization stress the importance of raising content standards; creating assessment and data systems necessary to track, adapt, and evaluate performance; enhancing the effective teaching of academic content -- often the weakest link in education reform initiatives -- and ensuring that the lowest performing schools and students do not continue to struggle.

The District RTTT Program provides an important opportunity for additional investment in local systemic reform activities not otherwise available in the current environment of declining state and local resources and shortchanged in ESEA and IDEA funding levels.

Additional Areas of Support in D-RTTT Requirements

In this national competitive education-reform initiative, the Council also supports a number of the quality, scope, and impact requirements in the proposed D-RTTT package, including:

- awarding only high-quality local applications without a specific quota or additional competitive points being awarded to any of the four funding slates (p. 2 in Absolute Priority 2-5);
- allowing applications from a consortium of LEAs (p. 1)
- allowing participation in only one D-RTTT application (p. 1);
- demonstrating a four-year track record of improving student outcomes, closing achievement gaps, and having a student data system to support instructional decision-making (p. 2 in Eligibility Criteria 4, and p. 5 in Selection Criteria B.1)
- allowing applicants to focus reform activities on a particular segment of the school district given the limitations in funding (p. 1 in Eligibility Criteria 1.a, and p. 6 in Selection Criteria B.4.a);
- setting a minimum service population of at least 2,500 students (p. 2 in Eligibility Criteria 2);
- setting a minimum low-income level of at least 40 percent on the free and reduced price lunch metric (p. 2 in Eligibility Criteria 3)
[The Council would prefer a 50 percent FRPL requirement, since 40 percent FRPL is less than the current national average and the FRPL metric serves as a proxy for the full range of disadvantaged and minority school children who are projected to soon become a majority of the nation's student population.]

The following comments from the Council of the Great City Schools emphasize one overriding concern in the proposed application requirements, and provide a number of additional suggestions to strengthen the operation and impact of the D-RTTT initiative.

Diversion of Effort from the Four RTTT Reform Areas Into Tangential New Priorities

School districts should be allowed to maximize this new funding opportunity by addressing the RTTT reform areas in the context of their own local systemic improvement and academic reform efforts without being channeled into new or tangential directions by D-RTTT application requirements and review criteria. In our opinion, the absolute and competitive priorities on personalized learning plans and wrap-around services are entirely new directions (not reflected in the original RTTT authorization), which could result in school district attention, resources, and efforts being diverted away from higher academic standards, expanded data and assessment systems, curriculum upgrades, revised instructional approaches, and new accountability measures now actively underway in reform-minded school districts.

Addressing both the absolute and competitive priority criteria in a D-RTTT project will be a practical necessity -- not a choice -- in order to receive a grant under the proposed rules. Districts will likely have to set up elaborate systems and procedures to meet the absolute requirement of an "individual learning plan" for each student, as well as to identify, integrate, and case-manage a variety of non-academic services for a student and a student's family. Some districts may want to apply for these particular personalized approaches and should be allowed to do so. But other districts that are committed to other approaches for increasing academic rigor, training teachers and principals, tracking performance, and revising instructional delivery systems should be able to propose their best thinking in the four RTTT reform areas without narrowing their reforms to fit prescriptive parameters of the proposed personalized learning and integrated services priorities. Moreover, there is limited research on the effectiveness of these practices to warrant these particular two priorities being implemented on a national scale.

High-quality differentiated instruction can be delivered effectively, and appropriate student interventions can be provided without mandating the "personalized learning" in the proposed D-RTTT requirements. For example, a large segment of special educators acknowledge that the No Child Left Behind subgroup performance and accountability system produced more significant academic progress for students with disabilities over the past decade than three decades of individualized education plans (IEPs) and prescriptive IDEA procedural requirements. A new study to be issued this summer by the Council of the Great City Schools and the American Institutes for Research shows that improvements in teaching and student achievement will not automatically result when timely student-performance information on interim assessments are available unless practitioners pay particular attention to specific instructional strategies and teaching skills that are informed by the data. The Council is concerned that the proposed D-RTTT personalized learning systems and individual student learning plans may add formalities and procedures to the instructional process without directly affecting the quality of teaching or student outcomes.

With only 20 grants being awarded, the D-RTTT initiative should support a wider variety of approaches to local systemic reform without narrowing district options under the proposed absolute and competitive priorities.

Recommendation: Delete the absolute priority on personalized learning and the competitive priority on integrated community services, in favor of more flexible approaches to the four reform areas of RTTT. Also, delete each of the selection criteria and subcriteria associated with the current absolute and competitive priorities.

Union Support as Part of Stakeholder Engagement and Support, Not as a Condition of Eligibility

A number of Council districts have expressed concern over union reticence to fully support and participate in a RTTT project. Similar issues arose in a number of districts during the State RTTT application process. The proposed D-RTTT requirements include the signature of the local union along with the signatures of the district superintendent and school board as a condition of eligibility. The superintendent and school board are legal representatives of the school district as a unit of local government -- the union is not. The Council finds it inappropriate for any non-government official to be delegated any aspect of control over the eligibility or ineligibility of a school district in the application for a federal grant. The Council suggests that the selection criteria for Meaningful Stakeholder Engagement and Support be weighted to reflect the importance of this criterion -- possibly with additional points for union support. The Council also finds that a 70 percent support level among teachers in LEAs without collective bargaining is unnecessarily high, and suggests majority support.

Recommendation: Strike paragraph 5 in the Eligibility Criteria on page 2, and appropriately weigh the Stakeholder Engagement and Support criterion in paragraph 3 under Reform Conditions in Selection Criteria B.3 on page 5. Also, on page 5 in Selection Criteria B.3.a.ii, strike “at least 70 percent” and insert “a majority”.

Delete Mayor, County Executive, and Township Administrator Comment and Response, and Revise State Comment Documentation Requirement

Many school districts serve multiple local communities headed by a variety of mayors or township administrators, as well as county executives. Securing formal comments from each of these officials is burdensome and of questionable benefit. The stakeholder engagement and support requirements in Selection Criteria B.3.b should suffice in ensuring the involvement of appropriate local elected officials. At the state level, a school district should not be required to document that the State “declined” to comment – it should be sufficient to provide evidence that the State was provided with the opportunity to comment for at least five business days.

Recommendation: On page 2 under State Comment Period, paragraph 1, subparagraph a., strike “evidence that the State declined to comment” and insert “evidence that the State was given five business days in which to comment.” And, on page 2, paragraph 2, strike the Mayor, City or Town Administrator Comment Period entirely.

Increase Emphasis on Districtwide Systemic Impact

Given the limited amount of funding available for each D-RTTT project, the Council supports allowing a district to focus RTTT funding on particular segments or portions of the school system. RTTT, however, is a systemic reform initiative. D-RTTT should demonstrate how the funded activities contribute to districtwide reform. The Council suggests consolidating the various subcriteria addressing districtwide systemic reform into the Vision Selection Criteria A, in order to fully explain the overall impact of the project's activities.

Recommendation: Relocate Selection Criteria B.4.d regarding districtwide change on page 6 as a new paragraph 3 under Vision Selection Criteria A on page 4.

Consolidate Selection Criteria and Subcriteria for Easier Application Development and Peer Review

The proposed D-RTTT requirements set out an extensive range of selection criteria, which will result in review points being diffused among far too many provisions. The Council suggests consolidating and streamlining many of the criteria and subcriteria and allow the peer reviewers to focus on the most critical reform issues and activities. The Council's recommendation to remove the multiple requirements and related criteria/subcriteria on personalized learning (see above) also will substantially streamline the application package.

Recommendation: The Council suggests wherever possible to use assurances instead of specific requirements in the selection criteria (e.g., the salary and expenditure information under Selection Criteria B.2 on page 5). Consolidate Selection Criteria D on Transition Plan and Continuous Improvement on page 10, and the accessibility and credit earning options in Selection Criteria C.3.a on page 11 into the "high quality plan" criteria under Selection Criteria B.4 on page 5-6.

Revise Funding Ranges to Better Reflect the Varying Sizes of School Districts, and Increase the Number of Available Grants

The funding structure of the proposed D-RTTT grants is flawed. A district or consortia serving 2,500 students could receive up to \$20 million, while a district serving hundreds of thousands of students is limited to receiving \$25 million. In effect, a district of 100,000 students -- which is 40 times larger than a district serving 2,500 students -- could receive only \$5 million in additional funding. Any funding structure will have some weaknesses, but the proposed structure is not equitable. The lower end of the funding structure should be lowered; the middle range should be adjusted; and the upper end should be increased. By lowering the lower range of grants, more grants can be awarded with available D-RTTT funding.

Recommendation: \$2.5 to \$10 million for 2,500 – 5,000 students. \$10 to \$20 million for 5,000 to 20,000 students. \$20 to \$30 million for 20,000 or more students.

Superintendent Evaluation and School Board Evaluation Requirements May Be Superfluous

The impact and appropriateness of an evaluation of a School Board, which is the legal authority of most school districts as units of local government, seems questionable – particularly for elected school boards. Additionally, most urban school boards already establish evaluative criteria for their superintendents.

Clarification Needed on Requirement for an Over-Representation Remedial Plan

School districts will be uncertain about whether they must meet the program requirement regarding over-representation on page 13. The final D-RTTT requirements should clarify the precise basis for a district being required to undergo an assessment and develop a plan regarding over-representation (see Program Requirements in paragraph 4 on page 13). If there is no official notice or criteria provided for school districts, then this requirement should be made into an assurance. The district would assure that if over-representation is determined during the D-RTTT grant period, an assessment and remedial plan would be developed and implemented.

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