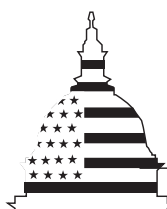


June 2000

TITLE I PROGRAM

Stronger Accountability Needed for Performance of Disadvantaged Students



G A O

Accountability * Integrity * Reliability

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Abbreviations

CCD Common Core of Data
SERFF Study of Education Resources and Federal Funding



G A O

Accountability * Integrity * Reliability

United States General Accounting Office
Washington, D.C. 20548

Health, Education, and
Human Services Division

B-282653

June 1, 2000

The Honorable James M. Jeffords
Chairman
The Honorable Edward M. Kennedy
Ranking Minority Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Christopher J. Dodd
Ranking Minority Member
Subcommittee on Children and Families
Committee on Health, Education, Labor, and Pensions
United States Senate

The Title I program was established in 1965 to help schools meet the needs of economically and educationally disadvantaged students. Title I has traditionally directed its funds to those students who are lowest-achieving or at highest risk for school failure. In 1994, the reauthorization of Title I established new provisions encouraging the use of the schoolwide option and increasing accountability for the educational outcomes of all children. You requested us to provide information about Title I services at schoolwide and targeted assistance schools, state efforts to hold schools and districts accountable for student achievement, and research and evaluations of Title I and schoolwide programs.

This report was prepared under the direction of Harriet C. Ganson, Assistant Director, Education, Workforce, and Income Security Issues, who may be reached at (202) 512-9045 if you or your staff have any questions. Major contributors to this report are listed in app. II.

Marnie S. Shaul, Associate Director
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Executive Summary

Purpose

Title I, the largest federal elementary and secondary education program, was established in 1965 to help schools meet the needs of economically and educationally disadvantaged students. Title I has traditionally directed its funds—approximately \$7.9 billion in fiscal year 1999—to those students who are lowest-achieving or at highest risk for school failure (targeted assistance). The 1994 reauthorization¹ of Title I expanded the focus of the program by increasing the number of schools eligible to use their Title I funds to improve the school as a whole (a schoolwide program). In 1994, the Congress also established new provisions aimed at creating greater accountability for educational outcomes—not just for disadvantaged children, but for all children. The addition of this broader focus to Title I—particularly the growth in schoolwide programs—caused concern for some educators and policymakers, who feared that some disadvantaged students might lose services they would otherwise have received.

In light of the current discussions regarding reauthorization of Title I, the Chairman and Ranking Minority Member of the Senate Committee on Health, Education, Labor and Pensions and the Ranking Minority Member of that Committee's Subcommittee on Children and Families asked GAO to examine how the changes to Title I, particularly the growth in schoolwide programs, have affected Title I's focus on disadvantaged children. GAO reviewed (1) the services provided under Title I schoolwide and targeted assistance programs, (2) states' efforts to ensure compliance with key Title I requirements and hold districts and schools accountable for educational outcomes, and (3) research on and evaluation of Title I overall and schoolwide programs in particular.

Background

Title I allocations vary considerably across schools, depending on, among other factors, the amount of money the district receives, the number of children in poverty, and how the school district chooses—with certain restrictions—to allocate its Title I dollars to individual schools. Although high-poverty schools are more likely to receive Title I funding across the nation, some high-poverty schools receive no Title I funds and many schools with below-average poverty rates do receive Title I dollars. According to 1999 Department of Education (Education) data, an estimated 54 percent of the approximately 91,000 public elementary and secondary schools nationwide received Title I funds, and about one-third of

¹The Improving America's Schools Act of 1994 (P.L. 103-382).

the schools that received Title I funds have poverty rates near or below the national average.

Prior to 1994, only schools with poverty rates of 75 percent or higher were eligible to choose the schoolwide option, but the 1994 reauthorization lowered the eligibility threshold to 50 percent. Currently, about half of Title I schools are eligible to choose the schoolwide option, and a large majority—an estimated 82 percent—of eligible schools have chosen this approach. The remaining Title I schools—those that are not eligible or choose not to adopt the schoolwide approach—are called targeted assistance schools and are required to target their Title I dollars to low-achieving students within the school.

In addition to expanding the availability of the schoolwide option, the 1994 Title I reauthorization broadened the accountability provisions. States are now expected to hold districts and schools accountable for educational outcomes. States are to collect and publicly report assessment data, develop criteria to determine whether schools and districts are performing satisfactorily,² and take actions to improve the performance of low-performing schools and districts. Then, to ensure that all types of students are making progress, states are to collect and report assessment results by six specified student categories—gender, racial and ethnic group, English proficiency status, disability status, migrant status, and economic status. States had until the 1997–1998 school year to develop content and performance standards. Education, as authorized by statute, extended the deadline for performance standards for many states to coincide with the deadline for assessments, which must be completely finalized by the 2000–2001 school year.

Education has responsibility for general oversight of Title I. As part of its oversight, Education conducts on-site reviews of each state's program every 3 to 4 years. This is done to assess whether states are adequately monitoring how schools implement Title I requirements—those that are financial and programmatic and those that are specifically related to outcomes. In addition, Education provides technical assistance regarding the interpretation of Title I—requirements and issues related to overall

²According to the 1994 Title I legislation, states must develop criteria to ascertain whether schools and/or districts are making adequate yearly progress. States may choose different ways to define these criteria, such as using a fixed target score for all schools or requiring schools to show improvement over time compared with previous results.

educational quality. This assistance takes a variety of forms such as conferences, forums, and ongoing staff contacts. Finally, Education conducts research on the effects of services provided under Title I.

Results in Brief

Both schoolwide and targeted assistance schools generally offered similar services, such as tutoring, and targeted additional services to students needing extra help. However, schoolwide schools were generally more likely than targeted assistance schools to provide services such as extended day programs and often chose different methods of service delivery, such as moving students in and out of flexible groups as their achievement levels changed. Educators at the high-poverty schools GAO visited generally preferred the schoolwide approach because they believed that it allowed them to serve more students, facilitated faculty collaboration, and allowed them to deliver services more efficiently and effectively. However, some principals and teachers cautioned that schools adopting the schoolwide approach need to be careful that low-achieving students still receive the extra help they may need to improve their academic performance.

Many states have yet to take all the steps necessary to oversee program operations and hold districts and schools accountable for results. States varied considerably in the frequency and focus of their efforts to monitor compliance with Title I requirements and to oversee program quality. In addition, some states had collected extensive and detailed information on educational outcomes, but most states had substantially less information on educational outcomes and on disadvantaged students in general. The majority of states had established criteria to determine whether schools and/or districts were performing satisfactorily. However, these criteria were sometimes confusing or vague and (with only one state as an exception) were based solely on the performance of the student population as a whole, without reference to the achievement of specific subgroups of children, such as students from low-income families or students with limited English proficiency. Consequently, states are not yet in a position to ensure accountability for the educational outcomes of disadvantaged students, the children that remain central to the mission of the Title I program.

Limited data and methodological problems have made it difficult to draw firm conclusions about whether Title I in general—and schoolwide programs in particular—are effective in improving educational outcomes. Because schools and districts have considerable discretion in spending

their Title I dollars and are not required to report the specific services provided, it has been difficult for researchers to isolate the effect of specific services. Education plans to expand its existing data collection to include information specific to Title I and schoolwide programs. These changes, combined with other actions to improve the completeness and quality of existing data, could facilitate research improvements.

Principal Findings

Educators Believe Schoolwide Approach Can Provide Additional Opportunities in High-Poverty Schools

Title I schoolwide and targeted assistance schools generally offered similar educational services. In the schools GAO visited, both schoolwide and targeted assistance schools directed specific services (such as tutoring) at students they had identified as needing additional assistance. However, according to recent surveys conducted by Education, schools using the schoolwide approach were more likely than targeted assistance schools to offer programs with extended instructional time, such as after school, weekend, or summer school programs.

Principals and teachers at the schools GAO visited said that the targeted assistance approach could lead schools to choose convenient, but less preferable, service delivery methods compared with the schoolwide approach. One Education survey found that 80 percent of targeted assistance elementary schools used pull-out programs, which take students out of their regular classrooms to provide additional tutoring or assistance; only 53 percent of the schoolwide schools used this approach. The pull-out option provides a convenient method for tracking students who received services and demonstrating that funds were used for students formally identified as eligible under Title I. While the schoolwide schools GAO visited sometimes used the pull-out strategy, they often preferred other approaches such as moving students in and out of flexible groups as their achievement levels changed.

Many district and school officials also said that the schoolwide approach allowed them to serve more students, fostered increased collaboration, and offered greater flexibility. In the high-poverty schools GAO visited, principals and teachers said that because most or all of their students suffered from educational disadvantages, the schoolwide approach allowed them to address learning deficiencies for a greater number of students, as well as to prevent such deficiencies. However, some school

and district officials cautioned that schools adopting the schoolwide approach need to be careful that low-achieving students receive the extra help they need to improve their academic performance.

District and school staff said that they believed the schoolwide approach helped principals and teachers develop unified goals, engage in shared decision-making, and assume responsibility for school improvement. State, district, and school officials also stated that the schoolwide approach allowed schools to use Title I funds without the need to direct these funds to specific students. Consequently, schools could use their federal dollars to employ a wider variety of instructional strategies. While those schools that have chosen the schoolwide option see a number of advantages in doing so, evidence regarding the overall effectiveness of the schoolwide approach is inconclusive, as discussed later.

Most States are Not Positioned to Hold Schools and Districts Accountable for Educational Outcomes of Disadvantaged Students

State efforts to monitor compliance and oversee program quality varied dramatically. Forty-seven states reported that they include on-site visits as part of their monitoring procedures, and many of these states reported that they rely solely on on-site visits to monitor certain key program requirements. The average time between visits ranged from 2 years or less (for 6 states) to more than 7 years (for 17 states). Three states reported that they made no on-site visits, while three states reported that they visited all their school districts each year.

Title I gives states considerable flexibility in deciding how to develop and implement assessments of students' performance. Consequently, there are major differences in states' assessments, including the format, content, and difficulty of the assessments, as well as whether all students participated in state-sponsored assessments. Moreover, while some states provided extensive, detailed, and timely assessment data that school and district officials found useful in improving instruction, other states collected or reported less data on student achievement. Only about one-third of the states have collected disaggregated data by all six required categories.

States varied in how they set criteria to judge whether schools and districts have been performing satisfactorily. While some states had developed clear and specific criteria for assessing adequate yearly progress for schools and districts, other states had outlined only vague objectives. The law does not require states to include criteria for adequate yearly progress that are based on disaggregated data, and only one state has chosen to establish criteria that include the performance of disadvantaged students. Without these

data, it will be more difficult for states to hold districts and schools accountable for the achievement of disadvantaged students, and to discern whether achievement gaps between disadvantaged and nondisadvantaged students are closing.

Evaluations of Title I and Schoolwide Programs Have Been Limited

Research efforts to determine the effect of Title I on student achievement have provided only limited information. Recent evaluations suggest that Title I may have had a limited positive effect on overall student achievement in high-poverty schools; less information is available specifically on the effect of schoolwide programs. Education plans to expand its data collection efforts in ways that may facilitate future research on program effectiveness for both Title I overall and schoolwide programs. These data could later be combined with other information about student achievement or school characteristics to allow for more comprehensive analyses of the effectiveness of Title I and schoolwide programs. However, while linking key databases may facilitate more comprehensive analyses, additional work is needed to improve data quality and consistency, especially for key variables, such as school poverty rate.

Recommendations and Matter for Congressional Consideration

GAO makes two recommendations to the Secretary of Education. First, Education should conduct additional activities to facilitate the exchange of information and best practices among states so they can identify ways to improve the timeliness and specificity of their assessment data, the collection and reporting of disaggregated assessment data, and the clarity of their criteria for adequate yearly progress. Second, Education should implement additional measures to improve research on the effectiveness of specific services in both schoolwide programs and targeted assistance schools. Such measures could include expanding and improving current data collection efforts so that comprehensive analyses could be conducted linking program characteristics to services and student outcomes and/or developing an evaluation design for a study or set of studies of educational services that would include national representation of both schoolwide and targeted assistance schools.

To hold schools and districts accountable for improving the performance of disadvantaged students and to help educators, parents, and others discern whether achievement gaps between disadvantaged and nondisadvantaged students are closing, the Congress should consider requiring that states' criteria for progress, as expressed in their definitions of adequate yearly

progress, apply specifically to disadvantaged children as well as to the overall student population.

Agency Comments

GAO obtained comments on a draft of this report from the Department of Education. Education agreed with most of the report's findings and conclusions but did not cite specific actions it would take in response to our recommendations.

Introduction

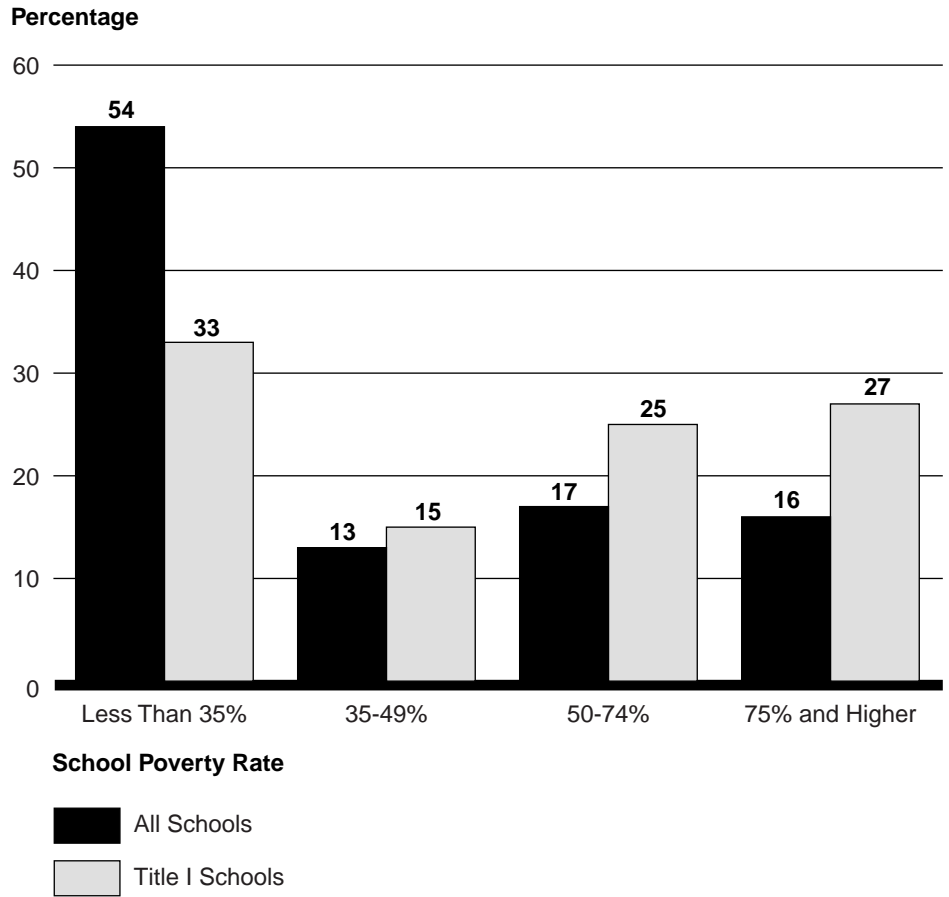
Title I of the Elementary and Secondary Education Act (Title I), the largest federal program for elementary and secondary education, targets its \$7.9 billion budget primarily to schools with a relatively high percentage of students from low-income families. Nearly half of Title I schools operate on a schoolwide basis—that is, the school can use its Title I dollars in combination with other funds to improve the school as a whole. The remaining schools that receive Title I funds are expected to target these funds to lower-achieving students within the school. In 1994, the Congress established new requirements whereby states (in addition to their general oversight responsibilities) were to collect and report information on educational outcomes and hold schools and districts accountable for results.

Title I Program Targeted Primarily—but Not Exclusively—to High-Poverty Schools

Title I was established in 1965 to help schools—especially high-poverty schools—meet the needs of disadvantaged students. Children from low-income families often face obstacles that can reduce their chances for success in learning. For example, children from low-income families are more likely to be exposed to drug abuse, violence, and unhealthy living conditions. In addition, parents in economically disadvantaged families sometimes have limited education and involvement in their children's learning. However, the effects of poverty on student achievement are not confined to students who happen to be poor themselves. Research shows that students in schools with high poverty rates are more likely to be low performers, independent of their own family background. These effects may be related to lower expectations on the part of teachers in high-poverty schools, lack of highly qualified teachers or sufficient resources in these schools, or other factors.

In recognition of these special challenges, the Title I program targets primarily high-poverty schools. Although high-poverty schools are more likely to receive Title I funding, some high-poverty schools receive no Title I funds and many schools with below-average poverty rates do receive Title I dollars. According to 1997–98 Education data, an estimated 54 percent of all schools have poverty rates near or below the national average, compared to about one-third of Title I schools (see fig. 1).

Figure 1: Distribution of Schools by Poverty Level and Title I Status



Note: Under Title I, school districts have some discretion in selecting the measure used for schools' poverty rates. The most commonly used measure has been students' eligibility for free and reduced-price lunches.

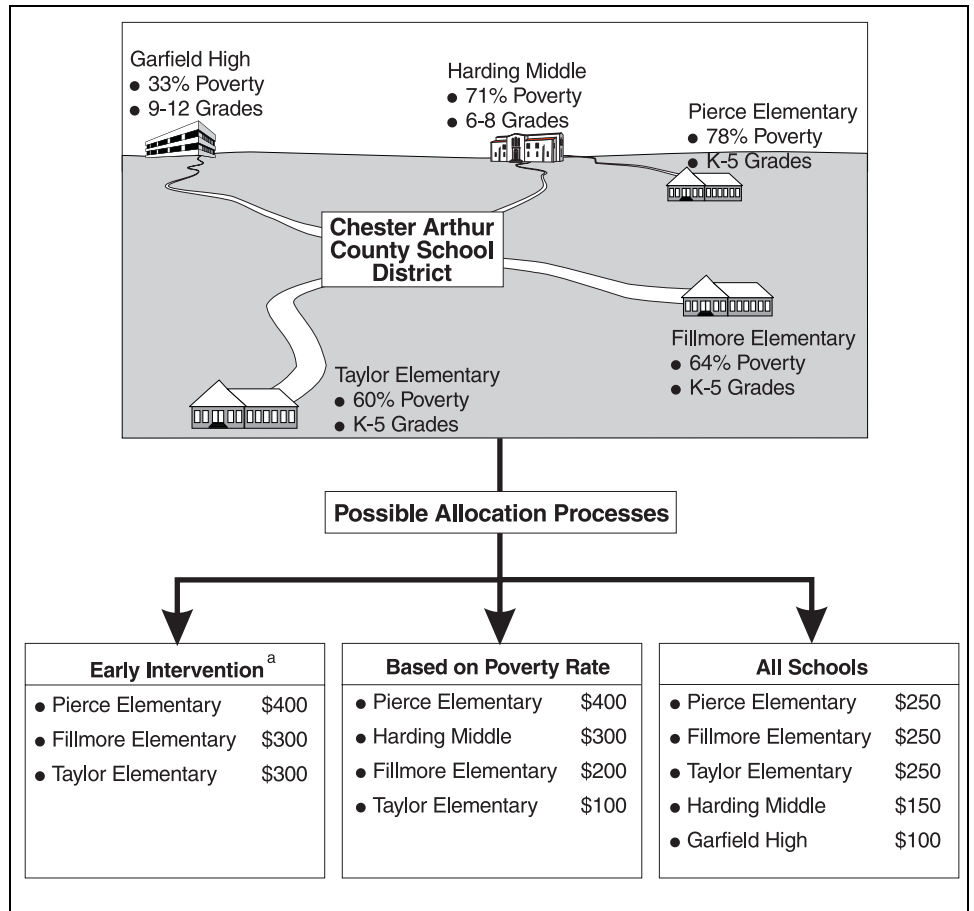
Source: Jay Chambers, Joanne Lieberman, Tom Parrish, and others, *Study of Educational Resources and Federal Funding* (Washington, D.C.: U.S. Department of Education, Planning and Evaluation Service, 1999).

Title I dollars are distributed to local school districts through state education agencies. The amount each school district receives is determined by a complex formula that incorporates, among other factors, the average per-pupil expenditure in the state, the number of children in poverty, and previous allocations to the state and the district. Once Title I dollars reach the local school district, district officials distribute the funds to the schools. A school is Title I eligible if its school attendance area has a poverty rate that is at least equal to the district average rate or 35 percent (whichever is less). District officials are required to follow certain rules in allocating Title I funds to schools based on the number of low-income students. First, districts must provide Title I funding to all schools with a poverty rate of 75 percent or higher before providing Title I funding to any school with a poverty rate below 75 percent. In addition, district officials must provide funding to schools with the same grade span in rank order of poverty rate.¹ Even within these requirements, however, district officials have some discretion as to which schools get Title I dollars and how much each school receives. Districts may choose to concentrate their Title I funds on their highest-poverty schools and limit school eligibility to a poverty level that is higher than the districtwide average. Districts may give schools different amounts per poor child so long as schools with higher poverty rates receive higher allocations per poor child than schools with lower poverty rates.² Fig. 2 provides an example of how this allocation process works.

¹If a district chooses to fund any school with a poverty rate below 35 percent, each school selected for Title I funding must receive a minimum amount per low-income student under the "125 percent rule." This minimum amount is equal to the total district allocation under Title I divided by the total number of low-income students in the entire district, multiplied by 125 percent.

²District and school officials may have additional flexibility in determining allocations for two reasons: (1) they can choose from different measures of poverty in determining school poverty rates; and (2) they may be able to affect the measured poverty rate in specific schools. Under Title I rules, as long as the same measure of poverty is used across schools, districts may use poverty rates derived from a number of data sources, including children eligible for free or reduced-price lunches (the most common measure), children eligible to receive medical assistance under the Medicaid program, or other measures. Some districts and schools can also take steps to increase the accuracy of the measured poverty rate. In one district we visited, the district sponsored billboards in low-income neighborhoods urging parents to sign their children up for free or reduced-price lunches. Similarly, at a school in another district, the principal told us that she made special efforts to get students to return their applications for the lunch program so that her school would exceed the 75 percent threshold and receive Title I funds.

Figure 2: Example of District-School Title I Allocation Process



^aDollar amounts shown are allocations per low-income child.

High-Poverty Schools May Choose the Schoolwide Option, Which Focuses on All Students in the School

Once funding has been distributed to the school level, Title I has traditionally expected schools to direct the funds to students who are low-achieving or at highest risk for school failure. However, a provision known as the schoolwide program allows a school to spend its Title I funds to improve the school as a whole, rather than targeting Title I funds to low-achieving students. The 1994 reauthorization of Title I increased the number of schools eligible to use Title I funds on a schoolwide basis. Before 1994, only schools with poverty rates above 75 percent were eligible to choose the schoolwide option, but the 1994 reauthorization lowered the

eligibility threshold to 50 percent. In addition, under a schoolwide program, the school is encouraged to take an integrated approach, combining federal resources with other funds to implement a school plan, instead of viewing each program in isolation.

The 1994 reauthorization encouraged the use of the schoolwide option and provided for waivers so that some otherwise ineligible schools could also adopt a schoolwide program. Consequently, the number of schools operating schoolwide programs has increased dramatically—from 3,903 in the 1993–94 school year to 19,701 in 1999. As of 1999, about half of Title I schools were eligible to choose the schoolwide option, and a large majority—an estimated 82 percent—of eligible schools have chosen the schoolwide approach. The remaining Title I schools—those that are not eligible or choose not to adopt the schoolwide approach—are called targeted assistance schools. These schools are required to target their Title I dollars to low-achieving students within the school.

Schoolwide schools had many of the same characteristics as high-poverty schools in general, because eligibility for schoolwide status is determined by poverty rate. In general, schools with poverty rates of 50 percent or greater are more likely to be elementary schools, to be located in urban areas, and to have a higher percentage of nonwhite students. Schools that adopted the schoolwide approach shared these characteristics.

States varied a great deal in the proportion of schools choosing the schoolwide option. Some states had a greater proportion of schoolwide programs than would be expected on the basis of the number of high-poverty schools in that state, while other states had a smaller proportion of schoolwide programs. For example, while 18 percent of New Jersey schools had poverty rates of 50 percent or greater, only 4 percent of all New Jersey schools (and 11 percent of Title I schools in New Jersey) operated schoolwide programs. In contrast, 43 percent of schools in South Carolina had poverty rates of 50 percent or greater, and many of these schools operated schoolwide programs—39 percent of schools in the state and 90 percent of Title I schools.³

Factors such as funding allocations, state and district support for schoolwide programs, and local circumstances may have contributed to

³School poverty rates were taken from Education's Common Core of Data and schoolwide data were obtained from GAO's 50-state survey.

the variation across states in the proportion of schools choosing schoolwide programs. For example, the proportion of all public schools in a state that received Title I funds varied considerably across states—from 20 percent in Nevada to 77 percent in Mississippi. A state where Title I funds were allocated to a greater proportion of schools, particularly schools with lower poverty rates, would likely have fewer schoolwide programs and more targeted assistance schools compared with a state where Title I dollars were concentrated in fewer schools. In addition, adoption of schoolwide programs may have varied because of state and district policies encouraging the schoolwide approach. According to school and district officials, other local or regional circumstances may also have played a role in the decision to choose a schoolwide program.

States Provide Program Accountability and Program Oversight

The 1994 legislation gave the states additional responsibilities designed to increase Title I's focus on educational outcomes for all students. Under the legislation, states were to take the major responsibility for holding schools and districts accountable for student achievement. Specifically, states were required to develop content standards to describe what students need to know and performance standards to describe expected proficiency in at least the core subject areas of reading and mathematics. States were then to establish assessments to measure how students are doing in relation to the content and performance standards.

Each state must report the results of assessments, as well as its other outcome data, to schools, districts, and the public. In addition to the overall results, states must collect and publicly report assessment results by six specified student categories: gender, racial and ethnic group, English proficiency status, disability status, migrant status, and economic status. States may also select other outcome measures (such as graduation rates) to capture important facets of school performance that cannot be measured through assessments. States must also develop criteria for determining whether schools and districts are performing satisfactorily. These criteria, collectively called adequate yearly progress, are designed to help states identify low-performing schools and districts. States may provide additional assistance, or invoke penalties or sanctions, to help and motivate low-performing schools to improve.

The deadline for implementing content and performance standards was the 1997–98 school year. Education, as authorized by statute, extended the deadline for performance standards for many states to coincide with the deadline for assessments, which must be completed by the 2000–2001

school year. During the transition period, while states are developing standards, assessments, and adequate yearly progress benchmarks, they can use an interim process for assessing schools and districts.

The new requirements for assessment, data collection and reporting, and accountability augment rather than replace Title I's long-standing financial and programmatic requirements. Under Title I, states have a significant role in ensuring that schools and districts comply with all these requirements. Title I also contains a number of requirements that address a variety of important program objectives, many of them directly related to protecting the interests of disadvantaged children. For example, requirements are directed not only at ensuring that Title I funds are targeted to high-poverty schools in accordance with the law, but also at promoting parental involvement in education—a factor that educators agree is particularly important to the success of poor and low-achieving students. Examples of some of Title I's key requirements are given in table 1.

Table 1: Examples of Key Title I Requirements

Objective	Requirement
Getting parents more involved in their children's education	Districts that get more than \$500,000 in Title I funds must spend 1 percent of their Title I allocations for parental involvement activities. Title I schools are required to have a school-parent compact, which describes the school's responsibility and the ways in which parents will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching.
Ensuring quality schoolwide planning that addresses the needs of disadvantaged students	Title I schools that choose a schoolwide program must produce a schoolwide plan that includes eight components required by law. Among these components are strategies and activities to address the specific needs of disadvantaged children. Title I schools are expected to implement their schoolwide plans, using any approach they choose, as long as the plan contains the required components.
Assuring continuation of state and local funding levels	Districts must meet maintenance-of-effort requirements—that is, aggregate state and local education expenditures for the preceding year generally may not be less than 90 percent of the expenditures for the year before. Schools are expected to use federal funds to supplement, not supplant, funds that would be available in the absence of federal funds for the education of students in Title I schools. State and local funds must be used to provide services in Title I schools that are comparable to services those funds are providing in other schools.
Ensuring that Title I funds are directed to high-poverty schools and disadvantaged students in accordance with the law	Districts must allocate federal funds in accordance with Title I regulations that target high-poverty schools. Targeted assistance schools must direct Title I funds primarily to services for students identified as lowest achieving or at risk of school failure.

The Congress and Education anticipated that the new accountability requirements, combined with Title I's financial and programmatic

requirements, would help all schools improve student achievement. Title I's programmatic and financial requirements would help ensure that important building blocks—such as strong parental involvement and additional funding for high-poverty schools—were in place. The availability of assessment and other outcome data at the local level would provide useful information to help schools identify and work on areas of weakness. The public distribution of these outcome data would provide a powerful incentive for improvement, and using these data to identify low-performing schools and districts would create added accountability. The success of this process, however, depends on states' ability to conduct careful oversight; collect and report detailed, specific, and valid outcome data; and implement clear progress criteria for schools and districts. In addition, states must collect and use the disaggregated assessment data—in combination with their oversight of key program requirements—to protect the interests not only of the general student population, but also of the disadvantaged students targeted under the Title I program.

Education Provides States With Assistance and Oversight

Although the states have the major responsibility for ensuring that local schools and districts comply with key Title I financial and programmatic requirements, Education oversees how states implement Title I requirements related to outcomes, and whether states sufficiently monitor how schools and districts implement Title I's financial and programmatic requirements. Education is also responsible for providing technical assistance to the states, not only on the interpretation of Title I requirements, but also on other broader issues related to overall educational quality.

As a major component of its oversight process, Education conducts on-site reviews for each state.⁴ Site visits are generally conducted on a rotating cycle every 3 to 4 years, with review teams spending about 5 business days in each state they visit.⁵ Education requires states to submit a self-assessment prior to the on-site visit to help focus the review. In addition to meeting with state education department officials, review teams generally visit a few local districts and schools.

⁴Education's site visits focus on how the states are fulfilling their responsibilities. States also make site visits to districts and schools to monitor compliance with key Title I requirements.

⁵The four states receiving the most money are reviewed more frequently.

In keeping with Education's technical assistance role, Education staff told us that they review state programs from a problem-solving rather than strictly a compliance perspective. The agency has also shifted from conducting separate reviews that focused on only a single federal program to broader, integrated reviews—including Title I reviews—looking at themes that cut across several federal programs. For example, themes have included parental involvement and professional development, which are important components of several federal programs. Although the theme is not the sole focus of the monitoring visit, Education staff said that areas related to the theme may be emphasized more. Education officials told us that the process for conducting on-site reviews is evolving and they expected to make additional changes in the future. While Education staff expressed support for the broader, cross-cutting review process, several individuals were concerned that this broader process may result in Title I compliance issues being monitored less thoroughly. Education officials said that they plan to supplement the integrated review process with program-specific reviews to address this concern.

In its leadership role, Education can encourage states to comply with Title I requirements. Education sponsors conferences and forums to allow states to share information, provides written guidance to states, and discusses issues with state officials during on-site monitoring reviews, as well as other means of providing technical assistance for program improvement. Education, for example, sponsored three regional meetings on assessment systems and has provided the states with some written guidance on progress criteria. Education is currently providing technical assistance to states in developing their progress criteria and final assessment systems.

Objectives, Scope, and Methodology

The Chairman and the Ranking Member of the Senate Committee on Health, Education, Labor and Pensions and the Ranking Minority Member of that Committee's Subcommittee on Children and Families asked us to examine the implications of the 1994 changes in the Title I program, particularly the growth of schoolwide programs. Specifically, the objectives of this study were to describe

- the services offered under the schoolwide and targeted assistance approaches and the extent to which schoolwide and targeted assistance schools provide special assistance to low-achieving or disadvantaged children within the school;
- how states and the federal government exercise general oversight for the Title I program; and how they measure, report, and create

accountability for educational outcomes, both for the student population as a whole and for low-achieving and disadvantaged students in particular; and

- the evaluations that have been conducted to examine whether Title I and schoolwide programs are contributing to improved student achievement.

To address these objectives, we obtained and analyzed information from a variety of sources at the federal, state, district, and school levels. To obtain data on characteristics of and services provided by schoolwide and targeted assistance schools, we reviewed and analyzed three national databases collected by Education:

- the Common Core of Data (CCD), which contains descriptive information on the approximately 91,000 public elementary and secondary schools in the United States, as reported by the 50 states;
- the Study of Education Resources and Federal Funding (SERFF), which contains information on school characteristics and services from a nationally representative sample of over 700 schools and 180 school districts in the 1998 school year; and
- the School-Level Implementation of Standards-Based Reform: Findings From the Follow-up Public School Survey on Education Reform, administered in 1998 to a nationally representative sample of about 1,600 school principals.

To obtain information on services provided under both targeted assistance and schoolwide programs and on the implementation of accountability requirements, we conducted on-site visits and interviewed state officials, district staff, principals, and teachers in five states: North Carolina, Pennsylvania, Rhode Island, Tennessee, and Texas. We chose these states to illustrate a variety of characteristics, including the number and percentage of schoolwide schools, the status of state assessments, the growth in the school-age population in the past 5 years, the state share of education expenditures, and Title I allocations per student. We visited 3 districts each in North Carolina, Pennsylvania, Tennessee, and Texas, and 1 in Rhode Island, for a total of 13 districts. In each district we interviewed the Title I director and other officials as appropriate, including superintendents, school support staff, and district staff involved in assessment. We selected these districts on the basis of several criteria, including their size and location. The districts we visited ranged in size from just under 1,000 to nearly 70,000 students and from 49 to 89 percent of students in poverty.

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Similarly, we visited between 1 and 3 Title I schools within each of these districts, for a total of 21 schools (15 elementary schools, 5 middle schools, and 1 high school). At each school we interviewed the principal and toured the facility; at the majority of schools, we also spoke with teachers and other school staff. We selected these schools on the basis of their poverty rates, grade levels, size, status as schoolwide or targeted assistance, diversity of student population, and other characteristics (see table 2).

Table 2: Characteristics of Schools Visited

School	State	Grade span	Number of students	Student racial breakdown ^a (%)	Poverty rate (percent)	Schoolwide	Targeted assistance
1	N.C.	K-5	318	90 black 7 white 3 Hispanic	95	X	
2	N.C.	K-5	903	41 white 38 black 11 Hispanic 10 Asian	48		X
3	N.C.	K-5	199	95 black 5 white	79	X	
4	N.C.	PK-5	247	59 black 39 white	69	X	
5	Penn.	K-5	663	47 black 31 white 20 Hispanic	81		X
6	Penn.	K-5	738	39 black 38 white 23 Hispanic	74		X
7	Penn.	K-6	180	100 white	69	X	
8	Penn.	6-8	663	47 black 47 white 5 Asian	47		X
9	Penn.	K-5	355	99 black	77	X	
10	R.I.	K-5	447	35 Hispanic 26 black 26 white 13 Asian	85	X	
11	R.I.	6-8	891	55 Hispanic 25 black 13 white 7 Asian	85	X	

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(Continued From Previous Page)

School	State	Grade span	Number of students	Student racial breakdown ^a (%)	Poverty rate (percent)	Schoolwide	Targeted assistance
12	Tenn.	K-4	814	53 white 42 black	49		X
13	Tenn.	K, 5-6	366	52 white 42 black	93	X	
14	Tenn.	K-8	164	100 white	63	X	
15	Tenn.	K-5	535	50 white 49 black	67	X	
16	Tex.	PK-5	884	96 Hispanic 3 black	97	X	
17	Tex.	6-8	1024	96 Hispanic 3 black	88	X	
18	Tex.	9-12	1664	88 Hispanic 9 black	82	X	
19	Tex.	PK-2	284	43 black 40 white 17 Hispanic	68	X	
20	Tex.	6-8	572	36 white 33 black 29 Hispanic	71	X	
21	Tex.	PK-4	417	61 Hispanic 36 white	79	X	

^aThe student racial breakdown for each school may not add up to 100 percent. In some cases, schools had racial groups represented by only a few students and these groups were not included. In other cases, the total did not equal 100 percent due to rounding.

We also surveyed the Title I directors in all 50 states in December 1999 and January 2000 to obtain information about how the states measured educational outcomes (including not only their state assessment systems but other outcome measures), the level of detail at which they publicized this information, their definitions of “adequate yearly progress” for schools and districts under Title I, and how they monitored the Title I program at the district and school levels. To obtain additional information on the data states make available to the public, we used a standardized data collection instrument to review the content of the 50 state education agencies’ Internet web sites for information on assessment, other outcome measures, and other information at the school and district levels. To obtain information on state outcome data, accountability systems, and Title I program monitoring, we interviewed officials from five states and reviewed documents they provided. We also reviewed the general literature on state accountability systems, assessments, and educational outcomes.

To obtain information on current research on Title I, Title I services, and schoolwide programs, we conducted a comprehensive literature search and review. We interviewed Education researchers to obtain information on their current studies and future evaluation plans.

We also interviewed staff in the Office of Compensatory Education (which administers Title I), as well as federal officials representing federal comprehensive technical assistance centers, regional education laboratories, and equity assistance centers. In addition, we interviewed representatives of major education associations and other experts. Finally, in addition to reviewing Title I law and regulations, we also reviewed and analyzed other Education documents, including program guidance, monitoring manuals, training materials, and reports from completed monitoring visits.

Our work was done between April 1999 and February 2000 in accordance with generally accepted government auditing standards.

Educators Believe Schoolwide Approach Can Provide Additional Opportunities in High-Poverty Schools

Schoolwide and targeted assistance schools often provided similar educational and support services. However, many of the educators we interviewed told us they preferred the schoolwide approach because they believed it provided disadvantaged students additional opportunities to improve academic achievement, especially in high-poverty schools. Both schoolwide and targeted assistance schools aimed special services at children who needed extra help. However, according to an education survey, schoolwide schools were more likely to use methods that increased instructional time (such as before-school, after-school, and summer school programs). Principals and teachers in high-poverty schools generally supported the schoolwide approach, primarily because they believed it helped them serve a greater number of students. At the same time, some educators expressed concern that schoolwide schools need to take care that broader efforts to improve student performance do not result in decreased services to those low-performing students who need special assistance. Moreover, evidence regarding the overall effectiveness of the schoolwide approach is inconclusive.

Schoolwide and Targeted Assistance Schools Generally Offered Similar Services but Varied in Service Delivery Methods

Title I schoolwide and targeted assistance schools often provided similar educational services for disadvantaged students and their families. In the schools we visited, both schoolwide and targeted assistance schools directed specific services (such as tutoring) to students identified as needing additional assistance. After-school programs were the most common type of extended instruction, and 7 of the 21 schools we visited used Title I funds to support after-school programs. Principals told us that the after-school programs consisted primarily of tutoring for low-achieving students and were generally available 1 or 2 days per week. Three of the schools that operated after-school programs also provided the students with other services, such as snacks and transportation home.

Most of the schools we visited—both schoolwide and targeted assistance—used Title I funds for activities designed to more closely involve parents in their children's education. These activities included parent-teacher meetings, workshops, parent advisory councils, and home-school liaisons. For example, one targeted assistance elementary school we visited used Title I funds to support workshops that provided parents with information about Title I services; ideas for helping their children with school work at home; and summer learning activities for their children, including a recommended reading list. A schoolwide school we visited used Title I funds to provide tables and chairs so that parents can have lunch with their children in a private area set aside near the school cafeteria. Some

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schoolwide and targeted assistance schools also provided family literacy programs for parents and students. For example, one school district we visited operated a family literacy center in collaboration with a local community college. Throughout the year, the center offered basic skills and parenting workshops to any parent with children attending the local public schools.

In several schools, Title I funds were also used to pay the salaries of home-school liaisons who linked schools with parents, students, and the community. In one targeted assistance elementary school, for example, the principal told us that the home-school liaison made about 1,100 home visits during the past school year to discuss with parents issues concerning their children such as attendance, homework, and other classroom or behavioral matters. At another schoolwide school we visited, the home-school liaison not only made home visits but also held monthly meetings for parents at school, regularly contacted parents to increase their involvement in school activities, coordinated the activities of parent volunteers at the school, and published a school newsletter. The liaison also established relationships with community members, recruiting a local business owner who then donated both time and money to the school.

While schoolwide and targeted assistance schools generally provided similar services for their students, schoolwide schools tended to offer a wider array of programs. In responding to Education's recent surveys, school officials reported that schools using the schoolwide approach were more likely than targeted assistance schools to offer programs with extended-time learning opportunities (see table 3).

Table 3: Principals Reporting Use of Extended-Time Learning Opportunities

Extended-time programs	Schoolwide schools (percentage)	Targeted assistance schools (percentage)
Before school	18	14
After school	53 ^a	36 ^a
Weekend	7 ^a	3 ^a
Summer school	39	36

^aStatistically significant.

Source: Camilla Heid and Ann Webber, *School-Level Implementation of Standards-Based Reform: Findings from the Follow-Up Public School Survey on Education Reform* (Washington, D.C.: U.S. Department of Education, Planning and Evaluation Service, 1999).

State, district, and school officials also told us that the schoolwide approach allowed schools to adopt instructional methods they considered more appropriate for all of their students. For example, one schoolwide elementary school we visited used interactive computer software designed to help teachers improve students' reading abilities. The computer program helped teachers identify students' strengths and weaknesses so that students were able to receive individualized assistance in areas of identified need. Under the schoolwide approach, this school could use Title I funds to purchase and implement the computer software for the whole class, without targeting it specifically to the lower-achieving students. Similarly, staff at one elementary school told us they preferred to keep all their students together in the same classroom and move them in and out of flexible groups as their achievement levels changed. These fluid groups allowed students to obtain long- or short-term remedial help as needed within the classroom, without being formally identified as Title I eligible. School officials also described classroom settings in which students were placed in small groups, combining strong and weak performers, and encouraged to help each other with reading.

In contrast, targeted assistance schools were more likely to rely on “pull-out” programs, using Title I funds to pay for teachers who provide remedial instruction targeted to specific students. The pull-out option can provide a convenient method for tracking who received Title I services and how the funds were expended, allowing targeted assistance schools to more easily demonstrate that funds were used for those students formally identified as eligible under Title I. However, while the schoolwide schools we visited sometimes used the pull-out strategy, they preferred other approaches.

Schoolwide Approach Viewed as Benefiting More Students

Under the schoolwide approach, schools can provide Title I services to more students, some of whom would not be eligible under targeted assistance. In the high-poverty schools we visited, many educators viewed this broader focus as a primary advantage of the schoolwide approach. They explained that most or all of their students suffered from educational disadvantages and that the schoolwide approach allowed them to prevent as well as address learning deficiencies. For example, one high-poverty, urban elementary school we visited used its Title I funds to help implement broad changes in the school curriculum. To help students improve their critical thinking skills, the school integrated a science theme throughout the curriculum, using new instructional methods such as hands-on activities and computers with science-related software programs. The

principal told us the schoolwide approach provided more opportunities to develop strategies that could benefit a greater number of students.

In contrast, targeted assistance schools more often relied on pull-out programs to provide remedial assistance to low-achieving students. For example, one Education survey found that 80 percent of targeted assistance schools used pull-out programs, while 53 percent of schoolwide schools used this approach.¹ Although pull-out programs provide intensive tutoring to low-performing students, they serve only a limited number of students each school year and may exclude other low or marginally performing students in need of additional instruction. One elementary school we visited, for example, used a well-known pull-out program to provide individualized reading instruction to low achievers in the early grades. In this school, one reading specialist provided one-on-one tutoring to about 10 children throughout the school year. While the number of students who receive these services will vary according to the number of reading specialists available, some district and school officials told us they did not adopt this specific program because it is expensive and can serve only a small number of students.

Many district and school officials also told us they favored schoolwide programs because this approach offered other advantages, such as fostering increased collaboration and greater flexibility. Before adopting a schoolwide approach, schools are required to develop school plans that describe strategies to improve academic achievement, both for low-achieving students and for the rest of the school. School officials told us that school staff participating in these planning activities worked together in new ways, creating better coordination and communication between instructional programs. For example, staff told us that during the planning process, classroom strategies such as team teaching were developed because of the teachers' willingness to try different approaches that may help improve all students' academic performance.

In addition to serving more students, the schoolwide approach can give schools greater flexibility in choosing educational strategies to improve student achievement. For example, one rural elementary school we visited implemented an approach that relied on reducing class size to give students

¹Heid and Webber.

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more individualized attention, while another school invested in professional development to help teachers implement state standards. Other schools we visited purchased computers and software that allowed students to progress at their own pace. In all of these schools, principals told us that the flexibility of the schoolwide program was an important factor in encouraging them to adopt the changes.

Some district and school officials cautioned that schools that adopt the schoolwide approach need to be careful to make sure that low-performing students receive the extra help they need to improve their academic performance and not be lost in the overall program. For several district and state officials, this concern was especially important for schools with relatively lower poverty rates and fewer disadvantaged children.

Nearly all of the schools GAO visited had high poverty rates and used the schoolwide approach. Most schools chose the schoolwide approach because school officials believed there were a number of advantages in doing so. However, research on the overall effectiveness of the schoolwide approach, as discussed in chapter 4, is inconclusive.

Most States Not Positioned to Hold Schools and Districts Accountable for Outcomes of Disadvantaged Students

Although Education is responsible for overseeing states' implementation of Title I, states continue to play a central role in program oversight and accountability at the school and district levels. Historically, states have been responsible for ensuring that districts and schools comply with Title I programmatic and financial requirements, such as protecting the integrity of federal funds and ensuring quality schoolwide planning that addresses the needs of disadvantaged students. Under the oversight of Education, states are expected to collect and report data on assessment outcomes and to hold schools and districts accountable for these outcomes.

States varied dramatically in their efforts to oversee schools' and districts' compliance with Title I's programmatic and financial requirements. States focused their reviews on different requirements and adopted different oversight methods. In addition, while some states made annual oversight visits to schools and districts, others never made visits. States also varied in how they reviewed schools' and districts' compliance with Title I requirements and the degree to which they implemented Title I's data collection and reporting requirements. Some states provided extensive, detailed, and timely assessment data that school and district officials found useful in improving instruction. Other states collected and reported less information on assessments, including results for economically disadvantaged students—information that is required beginning in the 2000–2001 school year. Furthermore, states' criteria for determining whether schools and districts have performed satisfactorily have, with one exception, been based solely on the performance of the student population as a whole, without reference to the performance of specific subgroups of children. Although the law does not require disaggregated data for yearly progress assessments, lack of these data makes it difficult for states to hold districts and schools accountable for the achievement of disadvantaged students, and to discern whether achievement gaps between disadvantaged and nondisadvantaged students are closing.

States Are Responsible for Ensuring Local Compliance; Education Provides Oversight and Technical Assistance

Under the oversight of Education, states play two distinct roles in ensuring accountability for the Title I program. First, the states must ensure that local schools and districts comply with the programmatic and financial requirements that apply to them. Second, the states are responsible for collecting and reporting data on assessment outcomes and devising criteria to hold schools and districts accountable for these outcomes.

In both these roles, states have considerable discretion in how they carry out their responsibilities and are generally free to develop their own

oversight methods and procedures. States also have discretion in designing and gathering outcome data. The states set standards that determine the key content children are expected to know. States can choose from a variety of assessments—from multiple-choice standardized exams to collected portfolios of student work—to measure student achievement as related to these standards. States can also collect and report other educational outcome measures. Finally, states have broad latitude in how they establish criteria for determining whether schools and districts are performing satisfactorily—for example, whether schools and districts will be evaluated solely on the basis of assessment results or whether criteria will include other measures of educational outcomes, such as graduation and dropout rates.

Education is responsible for assessing whether states implement Title I requirements related to assessments and sufficiently monitor schools' and districts' implementation of Title I's financial and programmatic requirements. Education also provides technical assistance to the states on Title I regulations and on program quality issues.

Focus and Frequency of Program Oversight Efforts Varied Across States

States varied in how they focused their program oversight efforts. Like the federal Department of Education, some states have approached their oversight process from a technical assistance rather than strictly a compliance perspective. For example, one state we visited used peer reviewers to help schools and districts interpret data on teaching practices and other key areas and placed less emphasis on compliance with financial requirements. In contrast, another state focused more on district-level program administration. Similarly, while the majority of states (34) conducted reviews that covered multiple federal programs, some states focused their review process on Title I alone.

States differed not only in their general approach to monitoring, but also in the methods they used in their Title I reviews. These methods included visits to districts and schools, reviews of state-required annual reports and self-assessment documents, and reviews of districts' financial audits.¹ For the most part, states depend on districts' data gathering and reporting, even though they may be incomplete in some areas. Consequently, on-site visits

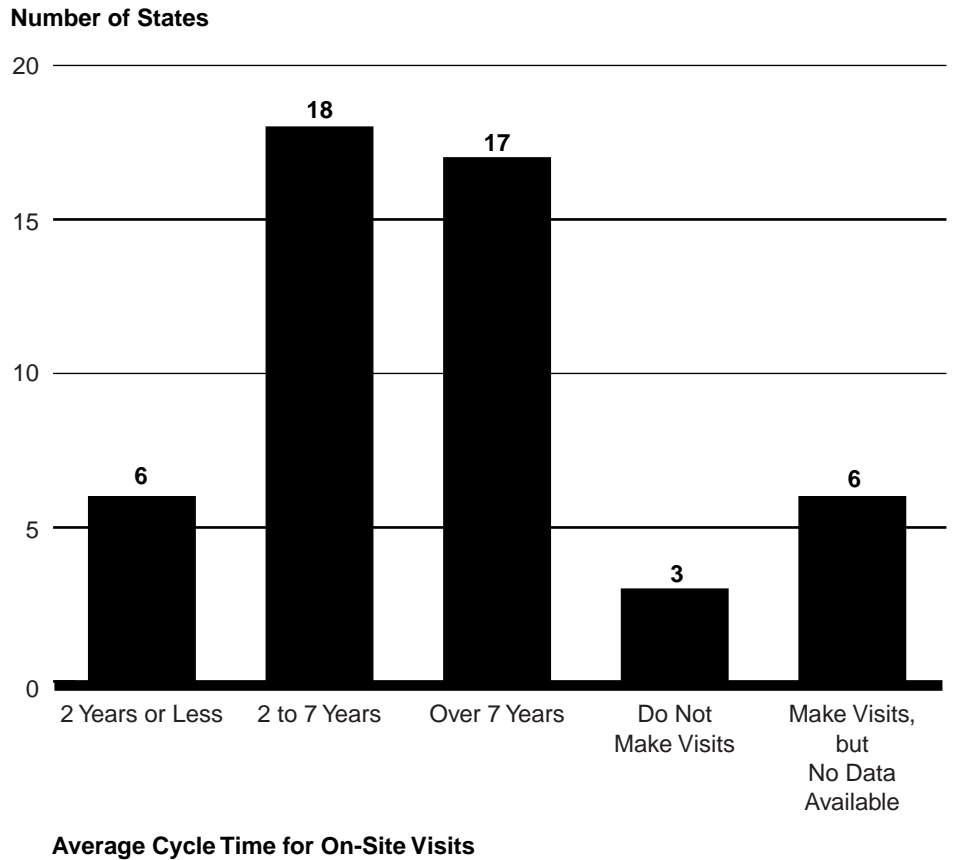
¹Under the Single Audit Act, recipients of federal funds may be required to have an annual single audit of the funds received from all federal programs to ensure that federal dollars are spent in compliance with applicable requirements.

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have generally been viewed as important because they provided state officials with the opportunity to look directly at program implementation. Forty-seven states reported that they included visits to school districts as part of their monitoring procedures, and many of these states reported that they relied solely on on-site visits to monitor certain key requirements. For example, 26 states reported reviewing the components of schoolwide plans only during on-site visits.

States varied dramatically in how frequently they conducted on-site reviews. For example, while most states made on-site visits to schools and districts, the average time between visits to districts ranged from 2 years or less (for 6 states) to more than 7 years (for 17 states), as fig. 3 shows. Three states reported that they made no on-site visits at all, while three states reported that they visited all their school districts each year. The fact that some states relied solely on site visits for oversight of key financial and programmatic requirements, and made only very infrequent visits, raises questions about whether these states conduct sufficient oversight.

Figure 3: Frequency of States' On-Site Monitoring



Source: GAO survey of the 50 state education agencies.

States Have Made Uneven Progress in Collecting and Reporting Assessment Data Essential to Accountability

States determine the content covered in state standards and how student performance is measured. States varied in the types of assessments used (for example, multiple-choice tests, questions requiring written responses, or alternative assessments such as portfolios of student work), the test length, the frequency with which assessments are done, and the analytic techniques used. States, districts, and schools also have some discretion over whether certain students (such as those with limited English proficiencies) are included in state-sponsored assessments. Nearly all states have collected some type of assessment or outcome data; however, few have obtained data specifically on certain groups of disadvantaged

students. Furthermore, although most states publicly reported assessment data for the overall student population of the district or school, many have not reported similar data on different groups of disadvantaged students.

**States Face Challenges in
Designing Valid
Assessments and Ensuring
Full Participation**

States are responsible for developing content and student performance standards as well as assessments to measure students' proficiencies. Every state except one has adopted content standards and established assessments; some states have established assessments in only reading and mathematics, while others also require assessment in areas such as science and social studies. In two states, the state allowed local districts to choose their own assessments; however, if districts choose different assessments, results may not be comparable.² In the remaining 48 states, the state education agency has required the same assessment on a statewide basis so results can be compared across all districts and schools.

Because so much of schools' and districts' accountability hinges on state assessments, it is important to ensure that these tests serve as valid measures of student achievement. States have made choices about the type, format, length, and difficulty level of the tests, and each of these choices can have implications for the usefulness of the assessment. For example, an assessment with a large number of multiple-choice items that focus on basic skills can provide extensive information to help schools improve the performance of low-achieving students, but might be less useful in promoting continuous improvement in schools with higher levels of academic achievement. An assessment that requires written responses to a smaller number of detailed and more difficult questions might better measure critical thinking skills but cover a narrower range of topics and provide less information on what material low-achieving students have mastered. Table 4 shows several important design issues, their implications for the usefulness of an assessment in accomplishing various purposes, and how states have responded to these issues.

²In one of these states, a large majority of districts have chosen to administer the same test. For more information about these states' systems, see Craig D. Jerald, "The State of the States," *Education Week: Quality Counts 2000* (January 13, 2000), p. 62.

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Table 4: Assessment Design Issues

Issue	Options	Implications	States' responses
Type of test	States must choose either a norm-referenced assessment, which may show a student's or school's results compared with a national average, or a criterion-referenced assessment, which measures knowledge in relationship to specific criteria (such as may be incorporated in the state standards).	Norm-referenced tests can provide national comparison information and may be easier to use because they are commercially available. However, a criterion-referenced test may do a better job of measuring students' knowledge compared to specific elements of the state standards.	27 states use a norm-referenced test in at least one subject; 38 states use a criterion-referenced test in at least one subject.
Test length	States must choose the number of items they include in their assessments.	States with very detailed and specific standards may find it difficult to cover the wide range of topics and also include enough items to provide a valid measure of knowledge in any one area. If state tests have too few items, they may not adequately test the students' knowledge of the range of topics. However, tests with an excessive number of items may result in students spending unnecessary time taking tests rather than being engaged in classroom instruction.	Although we did not specifically examine variations in test length as part of our study, it seems reasonable to expect that length of assessments varies across states.
Test format	States must choose from more traditional objective-style questions (like multiple-choice), questions requiring written responses, and alternative assessments (such as portfolios of student work).	Traditional, multiple-choice questions can be machine-scored, and the results of the scoring do not depend on the individual grading the test. Some experts prefer formats that require students to generate their own response. Assessments with such questions, however, can be more costly and difficult to score. Similarly, portfolios may be preferred because they reflect the student's work over time rather than on one test day; however, obtaining consistent, objective scoring of portfolios can also be time-consuming and expensive.	Only 4 states rely exclusively on traditional multiple-choice assessments in their core subjects, 44 included open-response formats in their assessments, and 2 required the use of portfolios statewide. ^a
Difficulty level	States must choose the overall difficulty level of the assessment.	A more difficult assessment that sets a high standard may motivate schools and districts to concentrate on challenging material but provide less information to use to help low-achieving students improve. If the lowest-achieving students can answer only a very few questions correctly, the test cannot help teachers distinguish between material these students have mastered and the material they have not.	Only limited information is available, but one study, which reviewed tests used in several states, found wide variation in difficulty level among 8th grade mathematics tests.

^aAs noted previously, two states leave the format of the assessment up to local school districts. For more detailed information on the use of open-response format questions on state assessments, see Jerald, p. 62.

Both federal legislation and Education's guidance have strongly emphasized that, to the extent practicable, all students should participate in state assessments. If certain students do not take the test, it impairs the state's ability to hold schools and districts accountable for those students' achievement. However, in some circumstances it may be considered

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appropriate to exempt an individual student or group of students from state-sponsored assessments. Students with severe disabilities, for example, may be working toward different educational goals than the general population, and thus it may not be considered appropriate to measure their progress against state standards.³

States varied in how they attempted to strike the balance between including as many students as possible and making sure that students were not subjected to inappropriate assessments. In our survey, 45 states reported that some students were exempted; however, over half (24) were unable to provide any information on precisely how many students were exempted.⁴ Similarly, of the 41 states that reported district- or school-level assessment data through their Internet site, only 20 provided any additional information about the extent to which students participated in or were excluded from assessments, and even fewer states (4) provided information that specified the reasons for student exclusions. Without such information, state officials and outside observers cannot determine whether state assessment results reflect achievement for all students or only for a selected group. Furthermore, if different numbers or types of students are excluded in different schools, school-to-school comparisons may become less meaningful.⁵

³Federal law expressly allows some students to be excluded from assessment. The decision to exclude a student with a disability is left to the student's Individualized Education Program team, which comprises the student's parents, teachers, district officials, and others. Students with disabilities may also (at the discretion of the team) receive accommodations—such as being allowed extra time or having part of the assessment presented orally—to help them participate in the assessment.

⁴Forty states excluded some students with limited English proficiency, and 40 states excluded some students with disabilities. In addition, 18 states sponsored alternative assessments for students with limited English proficiency (such as a Spanish-language version), and 18 states sponsored alternative assessments for students with disabilities.

⁵Although we did not collect information about the extent of accommodations for students with disabilities, a recent research study confirms that similar issues arise when states, schools, and districts differ in their practices in granting accommodations. For more information about this issue, see Anne Lewis, *1998 CRESST Conference Proceedings, Comprehensive Systems for Educational Accounting and Improvement: R&D Results*, National Center for Research on Evaluation, Standards, and Student Testing (CRESST), CSE Technical Report 504 (Los Angeles: University of California, June 1999).

**Some States Collected
Assessment Data
Specifically on
Disadvantaged Students;
Few States Collected Other
Outcome Data for These
Students**

States varied in the type and amount of data they collected from schools and districts on assessment results and other outcome measures for disadvantaged students. Some states collected information on assessment results specifically of disadvantaged students. Fewer states indicated that they collected information on other educational outcomes, such as dropout or attendance rates of these students.

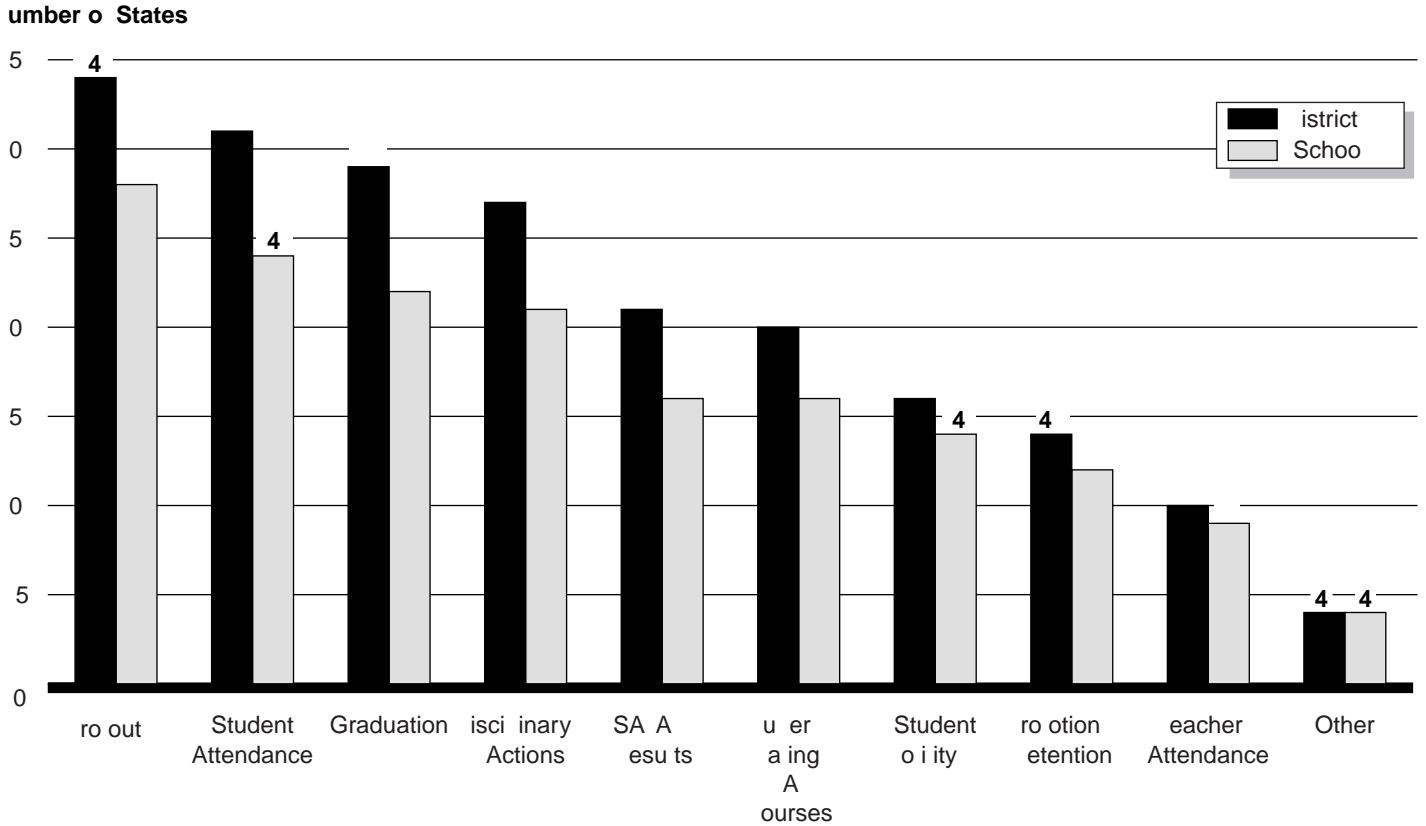
Title I requires states to collect assessment results separately for specific subgroups of students when final assessments are in place; however, many states have not yet collected all these data. As of fall 1999, only 17 states—less than half—had disaggregated their assessment results by all six required categories (gender, racial and ethnic group, migrant status, disability status, English proficiency status, and economic status). The most frequently omitted category was migrant status, perhaps reflecting the limited outcome information generally available on migrant students.⁶ Many states also did not disaggregate assessment data by economic status.

In addition, 38 states reported that they gathered other outcome data not required by Title I legislation. The most commonly used measures were student attendance, dropout, and graduation rates, as shown in fig. 4. Only 4 states indicated that they disaggregated these data by the six categories required for assessment data; 14 states did not disaggregate their other outcome data by any of these categories (see fig. 5).

⁶For more information on these issues, see *Migrant Children: Education and HHS Need to Improve the Exchange of Participant Information* (GAO/HEHS-00-4, Oct. 15, 1999).

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Figure 4: Other Outcome Measures Gathered by States

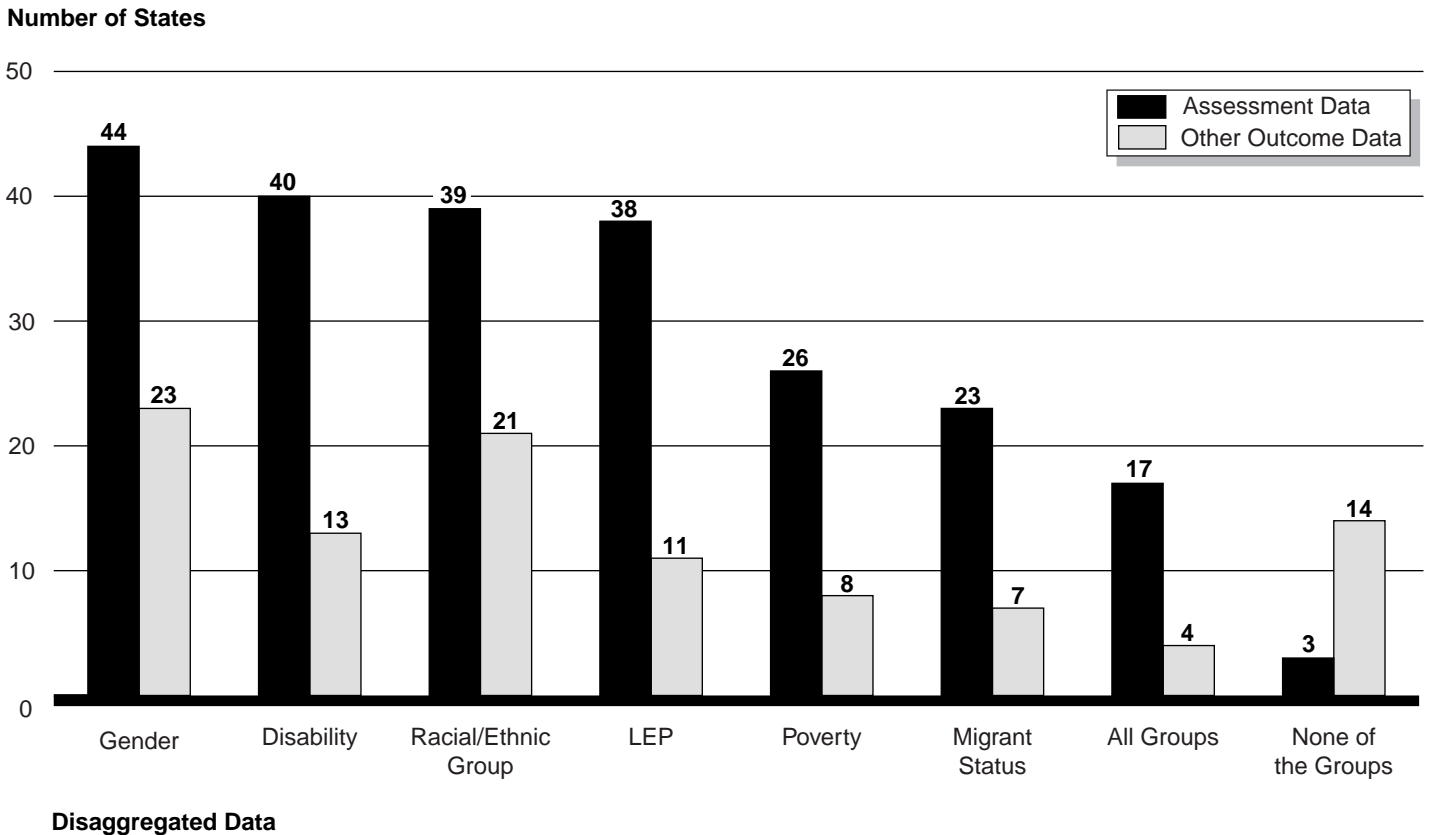


Other Outcomes Measured

Source: GAO survey of the 50 state education agencies.

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Figure 5: Number of States That Disaggregate Assessment and Other Outcome Data, as of Fall 1999



Source: GAO survey of the 50 state education agencies.

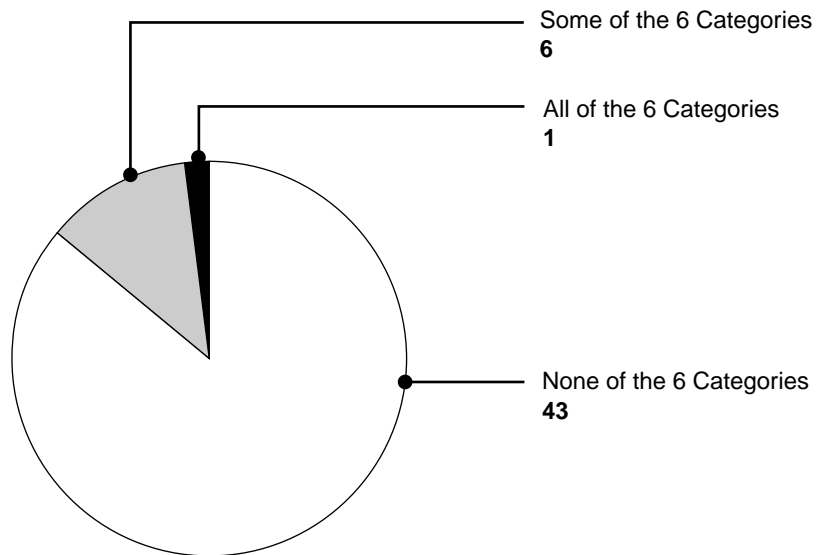
Most States Publicly Report Outcome Data but Fewer States Report Data for Various Subgroups of Disadvantaged Students

While most states report assessment results to the public, many states do not separately report data for various subgroups of disadvantaged students. In the 1994 Title I reauthorization legislation, the Congress recognized that publicity could be an important tool for holding schools and districts accountable for student performance. By making test results available to the public, states give parents, educators, and the community information on how their schools are doing and provide an incentive for schools and districts to improve their results. Nearly all states (48) said they made their assessment data available to the public; fewer (34) reported their other outcome data. State survey responses indicated that the majority of states report assessment information to the public through

press releases and by making information available on states' Internet web sites.

While most states publicly reported assessment and other outcome data for the overall population of the district or school, some states did not report such data by specific groups of disadvantaged students. For example, one state official told us that although the state keeps disaggregated assessment data, his office does not use them. States identified the Internet as one of the most widely used means of publicizing assessment results, and it is a natural choice for distributing the more voluminous information from disaggregated assessments. However, very few states used the Internet to report disaggregated data, as fig. 6 illustrates.

Figure 6: Number of States Reporting Disaggregated Assessment Data Through the Internet



Source: GAO review of the Internet web sites of the 50 state education agencies.

Assessment and other outcome data clearly play an important role in holding schools and districts accountable for student performance in general and for disadvantaged students in particular. However, staff at many of the districts and schools we visited also emphasized how these data helped them improve instruction. District officials and principals told

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us that they used assessment and other outcome measures to focus attention and effort on improving student achievement. For example, several schools we visited displayed signs, banners, or bulletin boards showing their progress in improving assessment results. District and school staff also reported using assessment information to identify and address weaknesses in instruction. One school we visited used a detailed analysis of the state assessment to identify key mathematics concepts students needed to work on, and set aside a 15-minute period each day for students to play special math games to develop and reinforce these specific skills.

School and district officials emphasized that data must be detailed and timely to be useful in improving instruction. However, the information reported by states was sometimes limited or late. School and district staff found assessment and other outcome data especially useful when broken down by teacher or objective, but only 12 states provided assessment data by teacher, 23 by objective, and 11 by individual test item. In addition, in two of the five states we visited, district and school officials told us that the results of the state assessments were not provided to them in a timely manner—making it difficult for them to make significant instructional changes to address students' needs.⁷

⁷In a number of districts we visited, district officials had implemented assessment programs of their own to better meet their needs for detailed and timely achievement data. Because these district-administered assessments were scored quickly and analyzed in detail, schools could identify problems and tailor solutions to the individual child, classroom, or school. Nine states made at least some questions from previous assessments available through their Internet site.

**States' Annual
Progress Criteria
Include Only
Assessment Results for
Overall Student
Population, Limiting
Accountability for
Disadvantaged
Students**

In addition to requiring that states collect and report data on educational outcomes, Title I requires states to establish criteria to evaluate whether schools and districts are performing satisfactorily—that is, making “adequate yearly progress” toward improving student achievement. States have chosen different ways to define criteria for determining adequate yearly progress. Some states defined their criteria on the basis of a fixed-target assessment score for all schools, while others required schools to show improvement compared with previous results. For example, one state required that 75 percent of all students in grades 4 and 8, and 85 percent of all students in grade 11, meet proficiency levels on the state assessment. In another state, for a school to meet the criteria, at least 50 percent of the students had to score at a satisfactory level in mathematics and reading for all grades tested for 2 consecutive years, or the number of students scoring at a satisfactory level had to increase by at least 5 percent from one year to the next. Although states are not required to establish their final adequate yearly progress criteria until the 2000–2001 school year, a majority of states reported these criteria in response to our survey of the 50 states.

Several states have very lengthy and complex adequate yearly progress criteria that can be difficult for school and district staff to understand and interpret. Officials in two districts we visited, in two different states, told us that they had encountered difficulties interpreting their assessment results in light of the states' expectations of performance. Other criteria we reviewed also appeared confusing or vague. If the school and district staff do not fully understand the criteria on which their performance will be judged, it is likely that they will have difficulty developing strategies for improvement. In addition, states have—with only two exceptions—defined adequate yearly progress solely in terms of assessment results, without including other educational outcome measures such as graduation, attendance, or dropout rates. These other outcome measures are also important in considering schools' and districts' performance, yet are generally not included in the yearly progress criteria. Because adequate yearly progress is a new concept, some states have had difficulty developing their criteria.

Annual progress criteria are not required by law to be disaggregated by subgroups of students, and only one state has chosen this approach. As a result, schools and districts may not be held accountable for closing achievement gaps over time among subgroups of students but only for improving the average overall student achievement. Because subgroups of students can have poor results on assessments even if the overall student

Chapter 3
Most States Not Positioned to Hold Schools
and Districts Accountable for Outcomes of
Disadvantaged Students

body is performing at higher levels, disadvantaged children may fall further behind even in schools making satisfactory progress according to states' criteria. Basing progress criteria on each student subgroup may unnecessarily complicate states' evaluation of school and district performance. However, in Texas, the state has included two specific subgroups—economically disadvantaged and race/ethnicity—in its definition of adequate yearly progress to improve accountability for the achievement of disadvantaged students.

Evaluations of Title I and Schoolwide Programs Have Been Limited

Nationally representative evaluations of the effectiveness of Title I are needed because state assessment data on the progress of disadvantaged students are currently limited and state data on overall student achievement vary in quality and type. However, research on the effectiveness of the Title I program is also currently limited, particularly for the more recent schoolwide approach. Previous research suggests that Title I may have a slightly positive effect on student achievement in high-poverty schools. Research on the general effectiveness of the schoolwide approach for improving student achievement in high-poverty schools is inconclusive.

Conducting research on the effectiveness of Title I presents challenges, including the difficulty of discerning the effect of Title I on the regular school program. Education's planned improvements in data collection show some promise for facilitating better research, but these efforts will need to be expanded to ensure that specific educational programs and services can be linked to achievement—both for disadvantaged students and all students.

Research Efforts Have Provided Limited Information on Program Effectiveness

Title I may have a limited positive impact on overall student achievement in high-poverty schools, according to the two most recent congressionally mandated studies completed by Education. Education's most recent national assessment generally concluded that, since 1992, national performance in reading and mathematics has improved for 9-year-olds in the highest-poverty public schools—those schools most likely to receive Title I funds.¹ However, the report also noted that a substantial achievement gap remains between students in the highest- and lowest-poverty schools. Education concluded in its earlier mandated study that Title I may have helped educational achievement but did not bring the participating students up to the level of their classmates.² Other research findings are based on data that are not nationally representative; these studies provide either weak positive evidence or mixed evidence about the effectiveness of Title I.

¹U.S. Department of Education, Office of the Under Secretary, Planning and Evaluation Service, *Promising Results, Continuing Challenges: The Final Report of the National Assessment of Title I* (Washington, D.C.: 1999).

²Abt Associates, Inc., *Prospects: Final Report on Student Outcomes*, prepared under contract to the Planning and Evaluation Service, U.S. Department of Education (Washington, D.C.: U.S. Department of Education, Apr. 1997).

Because of data and methodological limitations, neither the national evaluations nor smaller studies have been able to support any conclusions on whether schoolwide programs are effective. The earlier national evaluation did identify five high-performing, high-poverty schools, three of which had adopted schoolwide programs; however, because there were so few schools, researchers could not draw conclusions on the basis of this finding. Similarly, another Education report on four case studies found that while administrators and faculty in schoolwide schools praised the schoolwide option, “the schools were not producing remarkable levels of student achievements.”³ Similar to what we discussed in chapter 2, evidence on the effectiveness of schoolwide programs was often based solely on the assertion of the school’s principal or Title I coordinator, according to a recent research synthesis.⁴ Several studies of schoolwide programs within individual school districts (including Philadelphia, Houston, and Minneapolis) have provided mixed results. For example, in Minneapolis the gap in math achievement between lower achieving and other students was smaller in schoolwide than in targeted assistance schools, but the opposite was true in Houston.⁵ Education has an ongoing study of Title I programs which may shed some light on factors affecting student achievement in high-poverty schools; however, it has a limited scope and is not nationally representative.⁶

³Sam Stringfield, Mary Ann Millsap, Rebecca Herman, and others, *Urban and Suburban/Rural Special Strategies for Educating Disadvantaged Children: Final Report*, prepared for the U.S. Department of Education (Apr. 1997).

⁴Kenneth K. Wong and Stephen J. Meyer, “Title I Schoolwide Programs: A Synthesis of Findings From Recent Evaluation,” *Educational Evaluation and Policy Analysis* (Summer 1998), pp. 115–36.

⁵Kenneth K. Wong, Gail L. Sunderman, and Jaekyung Lee, “Redesigning the Federal Compensatory Education Program: Lessons From the Implementation of Title I Schoolwide Projects,” *National Center on Education in the Inner Cities Review*, Temple University (Aug. 1997).

⁶See Brenda Turnbull, Megan Welsh, Camilla Heid, and others, *The Longitudinal Evaluation of School Change and Performance (LESCP) in Title I Schools: Interim Report to Congress*, prepared for the U.S. Department of Education (July 1999).

Data Limitations Present Challenges in Evaluating Program Effectiveness

The lack of comprehensive, detailed, and nationally representative data on Title I schools and services has made program evaluation especially challenging. For example, researchers have been generally unable to clearly link Title I services to student achievement because the available data are not sufficiently comprehensive. As we found in our site visits, schools use the flexibility they have under Title I to spend funds on a wide variety of goods and services, some of which are similar or identical to goods and services offered at other schools but not supported with federal funds. This makes it even more difficult to distinguish the effect of Title I from the effect of the overall educational program of the school.

Researchers also face challenges linking differences in student achievement to Title I rather than to other factors such as differences in the resources available to schools. To link Title I to student achievement, researchers need sufficiently detailed data to either select comparable schools to study or to statistically estimate the effect of program services on student achievement separately from other external factors. However, available data do not contain the information needed to select comparable schools or to statistically adjust for other factors. For example, Education's major database on U.S. public schools, the Common Core of Data (CCD), does not currently provide information on whether a school receives Title I funds or has a schoolwide program; the CCD provides only incomplete information on school poverty rates. Without these data, researchers cannot use the database to identify schoolwide and targeted assistance schools with similar poverty rates.

Other challenges exist in evaluating the effectiveness of educational services in both schoolwide and targeted assistance programs. One is selecting an appropriate measure of student achievement. And, as discussed in chapter 3, measures of student achievement are not comparable across states.

In addition, no clear consensus has emerged on what criteria should be used to determine whether Title I is effective. For example, the results of one of the earlier evaluations indicated that Title I students learn at approximately the same rate as their more advantaged peers, but that gaps in initial achievement tend to remain.⁷ Some individuals have interpreted results from the Prospects Study as evidence that the Title I program may

⁷Abt Associates, Inc., *Prospects: Final Report on Student Outcomes*.

not be effective. Others disagree, pointing to work which suggests that without intervention, gaps in achievement between disadvantaged and other students tend to grow over time.

To meet some of these challenges, Education plans to expand its data collection to facilitate research on the effectiveness of Title I, including schoolwide programs. For example, Education officials plan to collect information on the Title I and schoolwide program status of the nation's schools as part of its CCD. This information could be combined with student assessment and services data to facilitate more comprehensive analyses of Title I effectiveness. In addition, Education is planning to expand its examination of the results of state assessments—including disaggregated data—to assess students' performance. While these assessment data will not be comparable across states, an analysis of student achievement on state assessments is important because it represents the primary criterion the Title I legislation applies to define school success.

Education's efforts to extend its data collection and analysis show promise for enabling better research, but these actions will still not fully address the challenges to determining program effectiveness. Education's analysis of disaggregated state data, for example, may provide helpful information in the future. However, the value of this type of analysis will be limited because not all states have fully disaggregated their assessment data. Moreover, Education's planned efforts will only partially address the need for more comprehensive data on school characteristics, resources, and services provided. For example, Education's plans to add Title I information to its CCD will be valuable, but data quality and consistency issues (such as missing data on poverty and other key variables) must be addressed.⁸ Similarly, detailed data on educational services, from a sufficiently large number of both schoolwide and targeted assistance schools, will be needed to assess program effectiveness.

⁸U.S. Department of Education, National Center for Education Statistics, *Evaluation of the 1996-97 Nonfiscal Common Core of Data Surveys Data Collection, Processing, and Editing Cycle* (Washington, D.C.: Feb. 1999).

Conclusions, Recommendations, Matter for Congressional Consideration, Agency Comments, and Our Evaluation

Conclusions

Educating children has traditionally been largely a state and local responsibility. However, through the Department of Education, the federal government has a role in supporting quality education for disadvantaged children and the responsibility for overseeing the nearly \$8 billion annual federal investment in the Title I program. In its program monitoring, technical assistance, and research roles, Education can help the states hold schools and districts accountable for the academic achievement of disadvantaged students. Since the 1994 reauthorization of Title I, states have made some progress in improving their systems for holding districts and schools responsible for the academic achievement of all students, including disadvantaged students. However, some areas are still in need of attention. Education, in its leadership role, has provided some assistance to states in developing standards, assessments, and criteria for adequate yearly progress; however, a majority of states appear to need additional help, for example, in collecting and reporting disaggregated assessment data.

Beginning in the 2000–2001 school year, states are required to collect and report assessment data disaggregated by subgroups of students, including the economically disadvantaged. Only about one-third of the states currently collect this information, and it is unlikely that all of the states will meet the deadline for collecting and reporting disaggregated assessment data. Without disaggregated data, test results for the whole student population can mask the results of disadvantaged students and prevent states and districts from identifying schools that may not be meeting the educational needs of disadvantaged students.

While the majority of states provided us with their criteria for adequate yearly progress, some of the criteria were confusing or vague. Moreover, only one state's criteria for adequate yearly progress are based on disaggregated data of subgroups of students. These criteria are needed to hold schools and districts accountable for improving the performance of disadvantaged students and to discern whether achievement gaps between disadvantaged students and nondisadvantaged students are narrowing over time.

Finally, Education's research can provide states, districts, and schools with important information to help them improve instruction. Comprehensive evaluation efforts are needed to determine which services and service delivery methods are most effective in closing the achievement gaps among students.

Recommendations

We make two recommendations to the Secretary of Education. First, Education should conduct additional activities to facilitate the exchange of information and best practices among states so they can identify ways to improve the timeliness and specificity of their assessment data, the collection and reporting of disaggregated assessment data, and the clarity of their criteria for adequate yearly progress. Second, Education should implement additional measures to improve research on the effectiveness of specific services in both schoolwide programs and targeted assistance schools. Such measures could include expanding and improving current data collection efforts so that comprehensive analyses could be conducted linking program characteristics to services and student outcomes, and/or developing an evaluation design for a study or set of studies of educational services that would include national representation of both schoolwide and targeted assistance schools.

Matter for Congressional Consideration

To hold schools and districts accountable for improving the performance of disadvantaged students and to help educators, parents, and others discern whether achievement gaps between disadvantaged and nondisadvantaged students are closing, the Congress should consider requiring that states' criteria for progress, as expressed in their definitions of adequate yearly progress, apply specifically to disadvantaged children, as well as to the overall student population.

Agency Comments and Our Evaluation

We provided a draft of this report to the Department of Education for review and comment. Without commenting on the recommendations, Education agreed that annual progress criteria based solely on the performance of the student population as a whole may be inadequate to hold schools accountable for the performance of disadvantaged students. However, Education said that such accountability does not necessarily require separate criteria for each of the six subgroups for which states currently must report assessment data. We did not say that separate criteria should be used for each of the student subgroups and we have modified the report to make this clear. Education also commented that some states may respond to including specific groups of disadvantaged students in their progress criteria by lowering standards. We continue to believe that it is important for states to include subgroups in their adequately yearly progress criteria because this information will help them hold schools and districts accountable for the performance of disadvantaged students.

Education also emphasized in its comments that states are not required to publicly report disaggregated data until the 2000–2001 school year. We had pointed this out several times in the report but had also found that many states are not yet positioned to meet this requirement. The large number of states that have not fully implemented assessments and disaggregated the results raises serious concerns about whether states will be able to provide the detailed data necessary to ensure accountability for the performance of disadvantaged students by the 2000–2001 school year.

The Department agrees with our position that it is difficult to separate the effects of Title I from the effects of state and local efforts. Education said that reviewing how schoolwide programs spend Title I funds would be insufficient to evaluate program effectiveness. We did not recommend this approach. Rather, we recommended that Education improve research on the effectiveness of specific services designed to address the needs of disadvantaged students. Research that links these services to educational outcomes can help determine which services are most effective for raising student achievement. This approach does not preclude other types of studies, such as Education’s National Assessment of Title I, that examine the overall performance of students in high-poverty schools. However, research on the effectiveness of specific services will be especially useful to principals and school district officials, in our opinion, because it can help them better leverage their Title I dollars to promote student achievement.

We reported that the lack of comprehensive, detailed, and nationally representative data on Title I schools and services has made program evaluation especially challenging. Education said that the agency has gathered detailed information on Title I through several nationally representative studies, including the Public School Surveys on Education Reform, the Study of Education Resources and Federal Funding, and the National Longitudinal Survey of Schools. We reviewed these data and found that the information they provide is valuable, but did not contain sufficient detail for researchers to assess the effectiveness of specific services. For example, while Education has collected some data on services, its surveys generally did not include sufficient information to allow researchers to control for differences in resources and student populations across schools. Education’s current efforts to extend its data collection and analysis show promise. However, additional steps will be needed to improve research on the effectiveness of federally supported services to address the educational needs of disadvantaged students.

**Chapter 5
Conclusions, Recommendations, Matter for
Congressional Consideration, Agency
Comments, and Our Evaluation**

Finally, Education provided other comments regarding technical aspects of the report, which we incorporated where appropriate. (See app. I for Education's comments.)

Comments From the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

May 17, 2000

Ms. Marnie S. Shaul
Associate Director
Education, Workforce, and Income Security Issues
United States General Accounting Office
Washington, D.C. 20548

Dear Ms. Shaul:

The Department of Education has reviewed the General Accounting Office report "Title I Program: Stronger Accountability Needed for Performance of Disadvantaged Students," which describes the current status of Federal and State efforts to ensure accountability in the Title I program. The report recommends that the Department identify ways to facilitate the exchange of information and best practices among States in the areas of (1) improving the timeliness and specificity of State assessment data; (2) collecting and reporting of disaggregated assessment data, and (3) clarifying State criteria for adequate yearly progress. The report also recommends that the Department improve evaluation of various Title I services through such means as expanding and improving data collections and developing a more comprehensive evaluation design.

The Department has long been concerned about the need to strengthen accountability for improving the performance of educationally disadvantaged students in Title I schools. Indeed, the Administration's proposal for the 1994 reauthorization of the Elementary and Secondary Education Act of 1965 (ESEA) included many of the accountability requirements now in the Title I statute. Moreover, the Administration's 1999 ESEA reauthorization proposal contains several additional measures to strengthen accountability in Title I schools and, in particular, to hold Title I schools accountable for the academic achievement of the lowest-performing students.

The report suggests that it will be difficult for States to hold schools and districts accountable for the achievement of disadvantaged students unless annual progress criteria include separate performance goals for each subgroup for which States must publicly report assessment data under Title I. Although annual progress criteria based solely on the performance of the student population as a whole may be inadequate to hold schools accountable for the performance of disadvantaged students, the Department does not agree that such accountability necessarily requires separate performance goals for each of the six subgroups (defined by race/ethnicity, gender, English proficiency, disability status, economic status, and migrant status) for which States currently must report assessment data. Because disaggregated performance goals would interact with State content and performance standards, the report's suggested approach may drive some

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**Appendix I
Comments From the Department of
Education**

States to consider lowering standards instead of identifying significantly larger numbers of schools and districts for improvement.

Another response to the concern identified by the GAO report is to require States to hold Title I schools accountable for increases both in overall student achievement and in the achievement of the lowest-performing students. Indeed, many States are exploring this approach, and it is what the Administration has proposed for the 1999 reauthorization of ESEA.

Within the requirements of current law, the Department has worked diligently in collaboration with States to strengthen accountability. While noting that some States have met Title I's requirement for publicly reporting disaggregated assessment data, the report finds that most States have not yet met this requirement. There is no doubt that the Department would prefer all States to report disaggregated data right now; indeed, we have provided substantial assistance to help States meet this requirement, including the development and dissemination of the widely used publication titled "A Guide to Practice for Title I and Beyond—Analyzing, Disaggregating, Reporting, and Interpreting Student Achievement Test Results." However, *the Title I statute simply does not require States to publicly report disaggregated data until the 2000-01 school year*. Currently, as this deadline approaches, the Department is reviewing State final assessment systems (using external peer reviewers) to ensure compliance with Title I assessment requirements, including the requirement that States publicly report disaggregated assessment data.

Moreover, since the 1994 reauthorization of ESEA, the Department has assisted States as they work to implement Title I's accountability provisions. For example, the Department supported a collaborative of State assessment practitioners who developed a 1996 paper, titled "Determining the Adequate Yearly Progress of Schools for IASA, Title I: Issues and Alternatives," which identifies options for developing adequately yearly progress definitions. More recently, the Department sponsored three regional meetings where State assessment experts shared information on designs for final assessment systems. During its current review of State final assessment systems, the Department is providing technical assistance to help States clarify adequate yearly progress definitions, to ensure that assessment systems include *all* students, and to ensure that assessments are valid, reliable, and aligned to State standards. The Department also will be reviewing the accountability systems of States that submit "Ed-Flex" applications. In addition, the Department's next round of on-site monitoring will focus on State compliance with Title I program improvement requirements.

The Department will be doing even more to strengthen Title I accountability as a result of an Executive Order issued this month by President Clinton. The Order, titled "Actions to Improve Low-Performing Schools," directs the Department to undertake a number of activities that address issues raised in the GAO report—specifically, to develop and implement a comprehensive strategy for strengthening the capacity of States and school districts to turn around low-performing schools. The strategy must include the latest research and information on best practices in a number of areas, including school

**Appendix I
Comments From the Department of
Education**

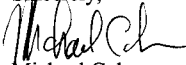
accountability. The Order also calls for improved data collection to track the progress of low-performing schools and districts.

Regarding the report's analysis of Title I schools implementing schoolwide programs, the Department recognizes the utility of studying how such schools use Title I funds. However, *the effectiveness of schoolwide programs cannot be evaluated by reference to how such schools spend Title I funds.* Fundamental to the schoolwide reform approach is the concept of combining resources to upgrade the curriculum and instruction of an entire school. Unlike the old Chapter 1 program, the current Title I program does not operate in isolation from State and local standards-based reform efforts. Rather, Title I funds are designed to leverage State and local reform efforts in schoolwide programs, and it will always be difficult to separate the effects of Title I from the State and local efforts leveraged by Title I.

Instead of studying the effectiveness of a particular funding stream by linking it to the particular activities it funds, it makes more sense to evaluate student outcomes by examining the performance of students that Title I is primarily intended to benefit: low-performing students and students in high-poverty schools. Indeed, the National Assessment of Title I follows this approach. It relies on multiple data sources, including State assessments and the National Assessment of Educational Progress, to examine whether student achievement is improving in Title I schools overall and in schoolwide programs in particular.

Finally, the Department does not agree with GAO's finding that there is a "lack of comprehensive, detailed, and nationally representative data on Title I schools and services." The Department has collected comprehensive, detailed information on Title I through a number of nationally representative studies, including two successive Public School Surveys on Education Reform, the Study of Education Resources and Federal Funding, and the ongoing National Longitudinal Survey of Schools.

Attached please find several technical comments on the draft report. The Department appreciates the opportunity to comment and will continue to collaborate with States, school districts, and schools to strengthen Title I accountability.

Sincerely,

Michael Cohen
Assistant Secretary

Enclosure

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