

July 2011

SCHOOL IMPROVEMENT GRANTS

Early Implementation Under Way, but Reforms Affected by Short Time Frames

U.S. Government Accountability Office

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1921-2011

ACCOUNTABILITY ★ INTEGRITY ★ RELIABILITY

Contents

Letter		1
	Recommendation for Executive Action	4
	Agency Comment	4
Appendix I	Briefing Slides	7
Appendix II	Comments from the Department of Education	42
Appendix III	GAO Contact and Staff Acknowledgments	45

Abbreviations

Education	U.S. Department of Education
ESEA	Elementary and Secondary Education Act
FY	fiscal year
Recovery Act	American Recovery and Reinvestment Act of 2009
SIG	School Improvement Grant
SY	school year

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G A O

Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

July 25, 2011

Congressional Requesters

The School Improvement Grants (SIG) program, which was created in 2002, funds reforms in the country's lowest-performing schools with the goal of improving student outcomes, such as standardized test scores and graduation rates. Congress greatly increased SIG program funding from \$125 million available in fiscal year 2007—the first year the program was funded—to \$3.5 billion in fiscal year 2009 for the 2010-11 school year. Three billion dollars of this amount was provided by the American Recovery and Reinvestment Act of 2009 (Recovery Act).¹ In addition, \$546 million was appropriated in both fiscal years 2009 and 2010, and \$535 million was appropriated in fiscal year 2011. These funds were provided to states by formula after the Department of Education (Education) approved state SIG grant applications.

The funding increases provided by the Recovery Act spurred Education to make substantive changes to the SIG program. For example, the persistently lowest-achieving schools receiving SIG funding must now implement one of four intervention models, each with specific requirements for reform interventions, such as replacing principals or turning over school management to a charter organization or other outside organization.² Also, after states receive their grants, states are required to award subgrants to school districts competitively, rather than by formula. State educational agencies evaluate grant applications using several criteria, including the school's proposed intervention model and the district's budget and reform implementation plan, as well as their capacity to implement the reforms effectively. Under the SIG program, a

¹Pub. L. No. 111-5, 123 Stat. 115.

²Among other actions, the four models include the following requirements: (1) the "transformation model" requires schools to replace the principal, provide increased learning time, and implement a staff evaluation system that incorporates measurements of student outcomes; (2) the "turnaround model" requires schools to replace the principal and at least 50 percent of the teachers; (3) the "restart model" requires the school to close and reopen under a charter school operator, charter management organization or an educational management organization; and (4) the "closure model" requires that the school closes and previously enrolled students move to schools that are higher achieving.

school may receive up to \$2 million annually for 3 years to improve student outcomes.

You requested that GAO conduct a broad review of the SIG program.³ On the basis of your request, this report provides preliminary information on the following questions:

- How have selected states administered the SIG program for grants starting in school year (SY) 2010-11?
- What factors influenced the implementation of SIG interventions in selected schools during SY 2010-11?
- How has Education provided oversight of SIG implementation and measured performance to date?

To determine how selected states have administered the SIG program, we selected a sample of six states based on several criteria, including population size, use of different intervention models, population density, and the number of districts and schools awarded SIG grants. Our findings address only the six states we visited and are not generalizable to all states. In each of the six states—Delaware, Nebraska, Nevada, Ohio, Rhode Island, and Virginia—we reviewed documents and interviewed state officials and representatives from one to three districts with Tier I or II schools receiving SIG funds in each state. Districts were selected to represent certain characteristics, such as a range of population density and use of different intervention models. The documents we reviewed included state and district SIG applications and documentation of SIG renewal procedures. In two of these states, Ohio and Virginia, we interviewed SIG school principals. We also interviewed Education officials with responsibility for SIG implementation and stakeholders—including national and local unions, external providers, and others—about their views on the SIG program. To identify factors that influenced the implementation of SIG interventions in selected SIG schools, we reviewed district documentation of SIG implementation efforts and interviewed district and school officials. We also reviewed federal laws, regulations, and guidance related to SIG, and interviewed Education officials and stakeholders. To determine how Education has provided oversight and

³We plan to issue another report on SIG in 2012 that will include additional information on SIG implementation in school year (SY) 2011-12.

performance measurement to date, we reviewed SIG monitoring protocols and other Education documents, and interviewed Education and state officials. We determined that the data we used in the report were sufficiently reliable for the purposes of the report.

We conducted this performance audit from January to July 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

On July 21, 2011, we briefed committee staff on the preliminary results of this study, and this report formally conveys the information provided during this briefing (see app. I for the briefing slides). In summary, our nongeneralizable sample and other evidence suggests the following:

- Among the selected states, some implemented SIG more rigorously than others. States with selective competitions funded only those district applications they identified as the strongest, and thus may be positioned for better student achievement outcomes. In contrast, other states awarded grants to all eligible Tier I and II schools that applied. States also varied in how they designed their grant renewal processes.
- Local capacity and short time frames affected schools' ability to implement SIG interventions in many of the states we visited. Local capacity—such as the ability to attract and retain administrative staff with school turnaround expertise or high-quality teachers—influenced implementation, and SIG interventions were often challenging for low-capacity districts. Education and state officials told us time frames for planning and implementing interventions were challenging in SY 2010-11 because, in some cases, state applications—which were due in February 2010—were not approved by Education until summer 2010. State and district officials told us that late approval of applications resulted in some SIG interventions not being implemented by the start of SY 2010-11. Despite Education's efforts to address these issues, late approval of state applications has remained an issue for SY 2011-12. For example, as of late June 2011 six states had not received approval of their SIG applications. Education officials told us that in many of these situations, states had submitted applications late. Although Education officials recognized

the continuing challenges with SIG time frames, they have not yet identified steps to address these issues.

- Education oversees SIG and plans to collect school performance data. The agency uses several strategies, such as reviewing state applications and monitoring, to oversee state and district SIG implementation. In addition, Education plans to analyze performance data from SIG schools to identify high-quality practices.

Recommendation for Executive Action

To provide districts and schools more time to successfully plan and implement SIG reforms, we are recommending that the Secretary of Education should do the following:

- Consider options to have SIG grants awarded to districts earlier, such as using an earlier deadline for state applications or approving state applications that include timelines for earlier awards to districts.

Agency Comments and Our Evaluation

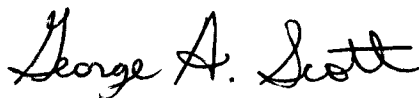
We provided a draft copy of this report to Education for review and comment. The full text of Education's comments is reprinted in appendix II.

Education generally agreed with our recommendation to consider options to have SIG grants awarded to school districts earlier. They said they are currently reviewing the most recent state application process to determine how they could facilitate future application reviews.

Education also provided some additional information about challenges rural school districts face with SIG. Specifically, they provided data about these districts' ability to apply and be competitive for SIG funds. We modified the report language to reflect the data they provided. In addition, Education provided information about recent steps they have taken to use SIG implementation data to improve their technical assistance efforts. We modified language in the report as appropriate. Education also provided us with several technical comments that we incorporated as appropriate.

We will send copies of this report to relevant congressional committees, the Secretary of Education, and other interested parties. In addition, this report will be available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or scottg@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



George A. Scott
Director
Education, Workforce, and Income Security Issues

List of Requesters

The Honorable Thad Cochran
Vice Chairman
Committee on Appropriations
United States Senate

The Honorable Tom Harkin
Chairman
The Honorable Richard C. Shelby
Ranking Member
Subcommittee on Labor, Health and Human
Services, Education, and Related Agencies
Committee on Appropriations
United States Senate

Appendix I: Briefing Slides



School Improvement Grants: Early Implementation Under Way, but Reforms Affected by Short Time Frames

**Briefing to Congressional Requesters
July 21, 2011**

Page 1



Overview

- Introduction
- Research Objectives
- Scope and Methodology
- Summary of Findings
- Background
- Findings
- Conclusions
- Recommendations

Introduction



School Improvement Grants (SIG) Provide Schools up to \$6 Million Each Over 3 Years to Improve Student Outcomes

- SIG funds reform efforts in some of country's lowest achieving schools
- SIG grants made to states by formula
- SIG was authorized in 2002 with the reauthorization of the Elementary and Secondary Education Act of 1965 (ESEA). It was first funded in 2007 and expanded and modified in 2009 to:
 - require state educational agencies to award grants by competition;
 - provide each school up to \$2 million per year for 3 years*^{*}; and
 - require districts to implement one of four intervention models in persistently lowest-achieving schools that are funded.

*The maximum award amount applies only to SIG funds obligated after October 1, 2010



Research Objectives

- 1) How have selected states administered SIG for grants starting in school year (SY) 2010-11?
- 2) What factors influenced the implementation of SIG interventions in selected schools during SY 2010-11?
- 3) How has the Department of Education (Education) provided oversight of SIG implementation and measured performance to date?



Scope and Methodology

- To address our objectives, we:
 - reviewed documents and interviewed state officials and officials in 1 to 3 SIG districts within 6 states (Delaware, Nebraska, Nevada, Ohio, Rhode Island, Virginia), selected based on population, use of intervention models, population density, and number of districts and schools awarded SIG grants;
 - reviewed relevant federal laws, regulations, program guidance, and other documents;
 - interviewed officials from Education, national and local unions, external providers, and other stakeholders.
- Our findings address only the 6 selected states and are not generalizable to all states.
- We determined that the data were sufficiently reliable for the purposes of the report.
- We conducted our review between January and July 2011 in accordance with generally accepted government auditing standards.



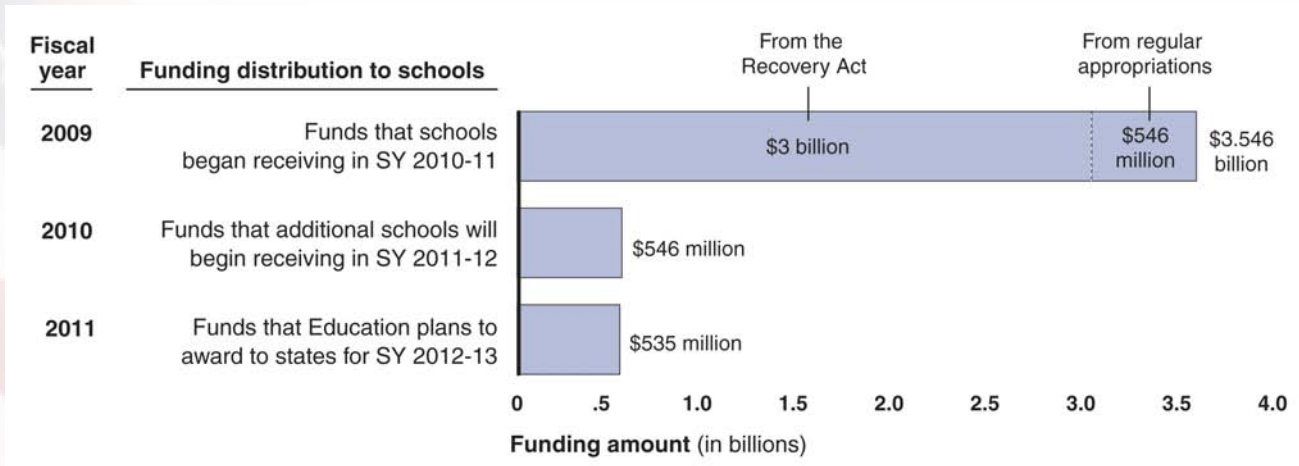
Summary of Findings

- Among Selected States, Some Implemented SIG More Rigorously Than Others
- Limited Capacity, Challenges in Rural Areas, and Short Time Frames Affected School Reform
- Education Uses a Variety of Strategies to Oversee SIG and Plans Additional Data Collection

Background



SIG Has Been Funded Through Regular Appropriations and the Recovery Act



Source: U.S. Department of Education website and guidance.

Background



States Are Required to Competitively Award Grants to Districts

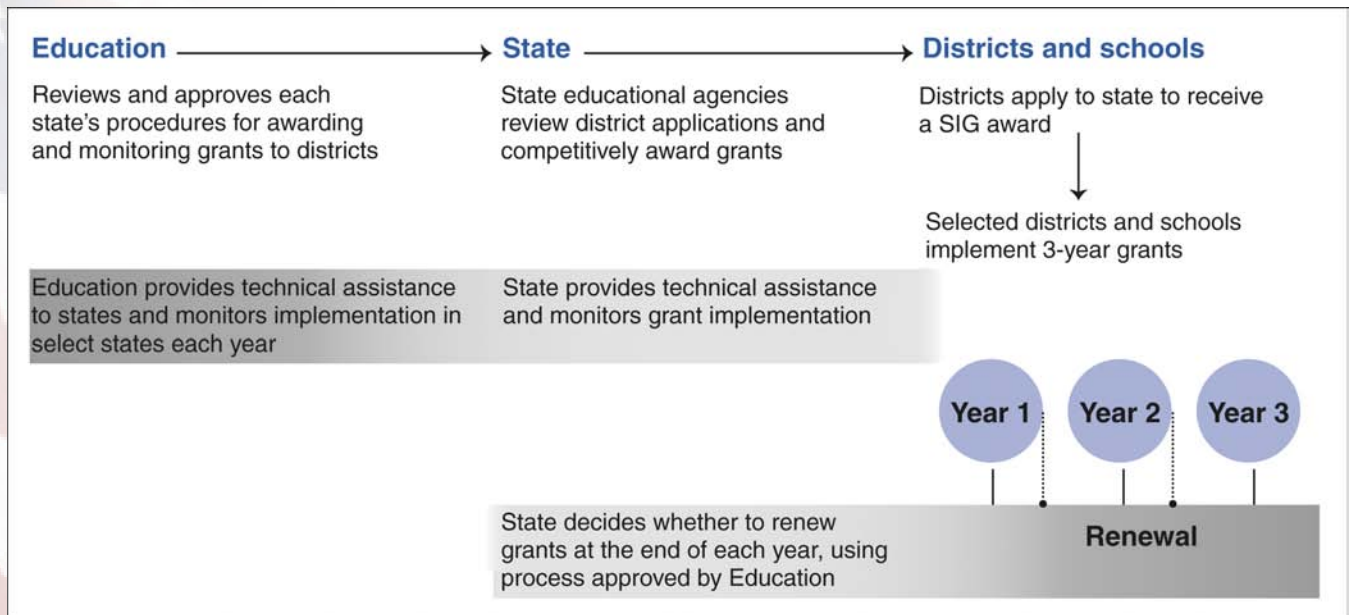
- States identify and prioritize eligible schools into 3 tiers:
 - Tier I schools: receive priority for SIG funding; are state's lowest-achieving 5 percent of Title I schools (or 5 lowest-achieving schools, whichever number is greater) in improvement status*;
 - Tier II schools: secondary schools eligible for, but not receiving, Title I funds with equivalently poor performance as Tier I schools; and
 - Tier III schools: Title I schools in improvement status that are not Tier I or Tier II schools.
- States are required to manage district competitions for SIG funds in which they evaluate school district applications based on factors such as the district's capacity to implement reforms.
- To receive funding, districts must, among other things, identify which of four intervention models (Transformation, Turnaround, Restart, Closure) they will implement in each Tier I and II school.

*Under Title I, Part A of ESEA, as amended, states set academic targets and measure schools' progress in meeting them. Schools in improvement status have missed academic targets for at least 2 consecutive years. The definitions of Tier I and Tier II schools also include high schools that have a graduation rate of less than 60 percent over a number of years.

Background



Education, States, Districts, and Schools Have Key Roles in SIG Award and Implementation Process



Source: GAO analysis.

Background



Transformation Model Requires Replacing the Principal and Extending Learning Time*

Teachers and school leaders	Time and support	Instructional and support strategies	Governance
<ul style="list-style-type: none"> • Replace principal • Implement new evaluation system <ul style="list-style-type: none"> – Developed with staff – Uses student growth as significant criteria • Identify and reward staff who are increasing student incomes; support and then remove those who are not • Implement strategies to recruit, place and retain staff 	<ul style="list-style-type: none"> • Provide increased learning time for staff and students • Provide ongoing mechanism for community and family engagement • Partner to provide social-emotional and community-oriented services and supports 	<ul style="list-style-type: none"> • Select and implement an instructional model based on student needs • Provide job-embedded professional development designed to build capacity and support staff • Ensure continuous use of data to inform and differentiate instruction 	<ul style="list-style-type: none"> • Provide school with sufficient operating flexibility to implement reform • Ensure ongoing technical assistance

Source: U.S. Department of Education.

*In some cases, Education allows flexibility where a district has implemented in whole or in part one of the requirements of the model within the last 2 years.

Background



Turnaround Model Requires Rehiring No More Than 50 Percent of Staff*

Teachers and school leaders	Time and support	Instructional and support strategies	Governance
<ul style="list-style-type: none"> • Use locally adopted “turnaround” competencies to review and select staff • Rehire no more than 50 percent of existing staff • Replace principal • Implement strategies to recruit, place and retain staff 	<ul style="list-style-type: none"> • Provide increased learning time for staff and students • Provide social-emotional and community-oriented services and supports 	<ul style="list-style-type: none"> • Select and implement an instructional model based on student needs • Provide job-embedded professional development designed to build capacity and support staff • Ensure continuous use of data to inform and differentiate instruction 	<ul style="list-style-type: none"> • Implement new school governance structure • Grant operating flexibility to school leader

Source: U.S. Department of Education.

*In some cases, Education allows flexibility where a district has implemented in whole or in part one of the requirements of the model within the last 2 years.

Background



Restart and Closure Model Requirements

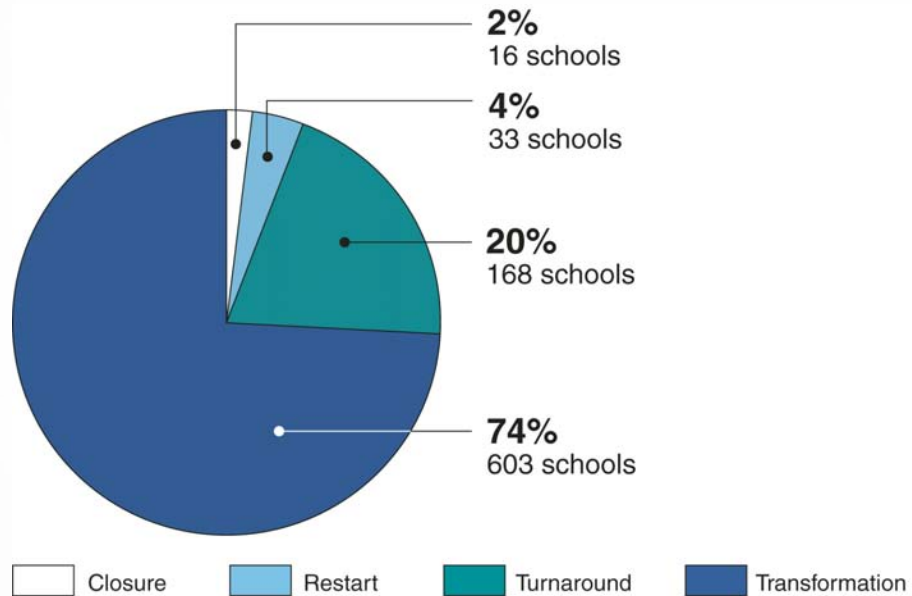
- **Restart:**
District must reopen school under management of external provider (charter school operator, charter management organization, or education management organization)
- **School Closure:**
District must close school and enroll students in higher achieving schools within reasonable proximity

Page 12

Background



Most Funded Tier I and II SIG Schools Implemented Transformation Model in SY 2010-11



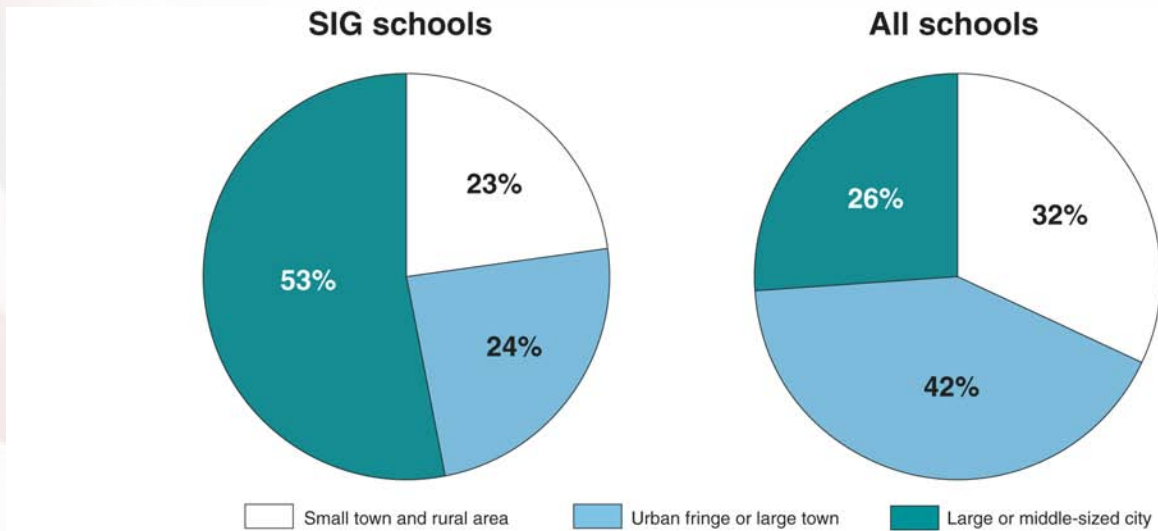
Note: These data include complete information from all states but Hawaii and Rhode Island. Districts with nine or more Tier I and Tier II schools may not implement the Transformation Model in more than 50 percent of their schools.

Source: U.S. Department of Education, *Baseline Analyses of SIG Applications and SIG-Eligible and SIG-Awarded Schools*, May 2011

Background



Most Schools Receiving SIG Funds Were In Large- or Middle-Sized Cities in SY 2010-11



Source: U.S. Department of Education, *Baseline Analyses of SIG Applications and SIG-Eligible and SIG-Awarded Schools*, May 2011.

Background



Grant Renewal Requires Meeting Certain Targets or Showing Other Signs of Progress

- According to Education, the core element for determining SIG grant renewal is annual reading and math achievement goals set by school districts subject to approval by states.
- Education's guidance says that if a school meets its annual goals, then the state must renew the school's SIG grant.
- If schools do not meet one or more annual goals, states have flexibility in setting criteria for making renewal decisions and may consider factors such as:
 - schools' progress in meeting annual goals;
 - fidelity with which school is implementing intervention model; and
 - schools' progress in meeting leading indicators.*

*The nine required leading indicators are: number of minutes within school year; student participation rate on state assessments; dropout rate; student attendance rate; teacher attendance rate; number and percent of students completing advanced coursework; discipline incidents; truancy; and distribution of teachers on district evaluation system.

Finding 1: States' SIG Management



Among Selected States, Some Implemented SIG More Rigorously Than Others

- Some states used a selective award process, while others approved all Tier I and II applications
- State oversight of and assistance to districts and schools varied
- External providers played a key role in some states' implementation plans
- States used federal flexibility in designing grant renewal processes

Finding 1: States' SIG Management



Some States Used a Selective Award Process, While Others Approved All Tier I and II Applications

- Some states were more selective than others in approving district applications. For Tier I and II schools in the 6 states we met with:
 - one state—Delaware—funded 1/5 of schools that applied;
 - two states—Nebraska and Ohio—funded 60-75 percent of schools that applied; and
 - three states—Virginia, Nevada, and Rhode Island—funded all eligible Tier I and II schools that applied.*
- States with selective competitions funded only applications they considered the strongest, and thus may be positioned for better student achievement outcomes.
 - For example, in Delaware, officials told us they only funded districts with highly innovative proposals that demonstrated capacity to implement proposed reforms.
- In contrast, Nevada and Ohio state officials noted variation in the quality of approved applications, and officials from some states said there were a few districts that received SIG grants that were not ready to implement reforms.

*In a recent Center on Education Policy survey, 22 of 43 state respondents (including the District of Columbia) indicated that 75 percent or more of schools in districts that applied for SIG grants actually received or will receive funds.

Finding 1: States' SIG Management



Some States Used a Selective Award Process, While Others Approved All Tier I and II Applications (cont.)

Selected states	Total FY 2009 award amount* (dollars in millions)	Number of funded districts serving Tier I and II schools	Number of funded Tier I and II schools	Number of Tier I and II schools in districts with applications rejected by state	Number of Tier I and II schools selecting each model			
					Turnaround	Transformation	Restart	Closure
Delaware	10.6	2	2	8	0	2	0	0
Nebraska	17.5	6	7	4	0	7	0	0
Nevada	23.4	3	10	0	3	7	0	0
Ohio	132.4	10	35	14	8	27	0	0
Rhode Island	12.5	2	5	0	0	5	0	0
Virginia	59.8	13	18	0	0	11	5	2

Source: GAO analysis of state and Education data on SY 2010-11.

*Total award amount includes 3-year funding for all schools (Tier I, II, and III), administrative funds for the state and districts, and carryover funds.

Finding 1: States' SIG Management



State Oversight of and Assistance to Districts and Schools Varied

- Some states provided greater levels of monitoring and oversight
 - Ohio hired transformation specialists to be in the field providing guidance and oversight to each school on a weekly basis.
 - Nebraska and Virginia required each school to designate a point person responsible for coordinating regularly with the state.
- In contrast, due to resource constraints, Rhode Island officials focused oversight on the district application process and districts relied on Education guidance about SIG implementation.
- Some states added requirements to Education's guidance to conform with their own SIG policies and program requirements.
 - Examples of additional requirements include requiring a district liaison to work with the state and requiring school and district officials to attend certain conferences.

Finding 1: States' SIG Management



External Providers Played a Key Role in Some States' Implementation Plans

- Some states relied on state-approved external providers to implement key elements of SIG*.
 - Virginia required all Tier I and II schools to contract with one of four state-approved external providers or demonstrate a rigorous review process and select an external provider
 - Ohio had about 70 state-approved providers.
- Delaware, Nebraska, and Nevada do not have approved provider lists, although in some cases, schools did work with external providers.

*The roles of external providers varied, but could include managing school operations, providing professional development, or conducting data analysis, among other possible functions.

Finding 1: States' SIG Management



States Used Federal Flexibility in Designing Grant Renewal Processes

- Education reviewed state renewal processes in state applications and allowed states considerable flexibility in identifying criteria for renewing schools' SIG grants.
- For example, Nebraska officials said they planned to examine outcomes of annual goals and progress on leading indicators. In addition, state officials told us they would base SIG renewal decisions on how schools have used SIG funds and would consider not renewing funding for underperforming schools after one year.
- In contrast, Nevada officials told us they plan to renew all schools receiving FY 2009 funds for 1 year because of the time needed to implement reforms, and will consider not renewing schools after 2 years if they do not make sufficient progress.
 - The approved Nevada state SIG applications for FY 2009 and 2010 say that the state plans to review schools based on achievement of annual goals and other factors, such as fidelity of implementation.

Finding 2: Factors Affecting Reform



Limited Capacity, Challenges in Rural Areas, and Short Time Frames Affected School Reform

- Local capacity affected schools' implementation of SIG interventions
- Implementation was particularly challenging in some rural areas
- Short implementation time frames in some cases did not allow schools sufficient time to plan and fully implement reforms

Finding 2: Factors Affecting Reform



Local Capacity Affected Schools' Implementation of SIG Interventions

- Local capacity—such as the ability to attract and retain administrative staff with school turnaround expertise or quality teachers—influenced implementation.
 - Several state officials and stakeholders said some school districts had greater capacity than others to implement SIG interventions.
 - Seaford, Delaware - district officials created a district-wide transformational support team composed of district administrators, the principal, teachers, and consultants that met regularly.
 - Columbus, Ohio - district held multiple-day planning sessions to involve principals and teachers in designing SIG plans.
 - Many officials told us teacher and union buy-in facilitated elements of reform, such as increased learning time and teacher reassignment.
 - Columbus, Ohio - district and union officials worked together to give SIG schools priority in staffing by allowing them to hire staff before other schools.

Finding 2: Factors Affecting Reform



Local Capacity Affected Schools' Implementation of SIG Interventions (cont.)

- Some districts faced challenges implementing interventions.
 - Cleveland, Ohio school district officials said they did not have capacity to provide each SIG school the necessary amount of support for SIG implementation.
 - Officials from a rural Virginia district said attracting and retaining high-quality teachers was very difficult.
- According to state and district officials, model selection was often based on feasibility rather than which reforms were most likely to improve student outcomes.
 - Turnaround Model – challenging in districts that lacked ability to recruit high-quality teachers
 - Restart Model – challenging in the one state we visited without a law permitting charter schools*
 - School Closure – not an option in districts lacking quality schools within reasonable proximity to displaced students

*One of the six states we met with—Nebraska—did not have a law permitting charter schools.

Finding 2: Factors Affecting Reform



Implementation Was Particularly Challenging in Some Rural Areas

- State and local officials from the states we met with told us that small rural districts often have fewer resources than larger districts to implement SIG.
- Some officials in rural areas felt constrained selecting a model, particularly:
 - in attracting qualified teachers as required in the Turnaround Model;
 - in attracting external providers as required in the Restart Model; and
 - being too far from neighboring schools to allow for School Closure.
- State and local officials told us that—even with higher salaries and other incentives—it is difficult to recruit and retain staff in some rural areas, particularly:
 - principals and teachers with school reform experience; and
 - specialized teachers (e.g., math teachers or those with expertise teaching students with disabilities).
- SIG requirements for increased learning time—which could lead to students leaving school at different times—resulted in high transportation costs for some rural schools with limited transportation resources.

Finding 2: Factors Affecting Reform



Short Implementation Time Frames in Some Cases Did Not Allow Schools Sufficient Time to Plan and Fully Implement Reforms

- In some cases, Education did not approve state SIG applications for SY 2010-11 until summer 2010, although interventions were to begin at start of school year.
 - Half the states we visited received final approval from Education in June or July 2010.
 - States were unable to approve district applications until Education approved state SIG grants.
 - Some districts did not find out how much SIG funding they would receive until shortly before the start of SY 2010-11, leaving little time for them to implement SIG reforms before the school year.
- Education, state, district, and school officials noted time frames for SY 2010-11 were challenging for states and districts.
 - In some cases, state deadlines to dismiss teachers and principals passed before district and school officials knew whether they would receive a SIG grant*
 - Many teachers and administrators could not be hired until shortly before or after start of SY 2010-11
 - Some SIG initiatives were delayed and not implemented at the beginning of SY 2010-11

*Officials from all of the states we met with told us they have laws regulating teacher or principal dismissal notification dates.

Finding 2: Factors Affecting Reform



Short Implementation Time Frames in Some Cases Did Not Allow Schools Sufficient Time to Plan and Fully Implement Reforms (cont.)

- To improve time frames for the second year of SIG, SY 2011-12, Education moved up the deadline for state SIG applications to December 2010—in the prior year, applications were due in February.
- In addition, Education is allowing SIG funds for SY 2011-12 to be used for planning before the start of the school year, which Education refers to as “pre-implementation.”
- Even with pre-implementation, Education still needed to approve state applications before district applications could be approved and implementation could begin.

Finding 2: Factors Affecting Reform



Short Implementation Time Frames in Some Cases Did Not Allow Schools Sufficient Time to Plan and Fully Implement Reforms (cont.)

- Despite Education's efforts, time frames for approving state applications for funds available starting in SY 2011-12 may again impact district and school SIG planning and implementation.
 - As of June 24, 2011, six states, including the District of Columbia, were still awaiting approval of their SIG applications. Four of the six states awaiting approval of their applications submitted them after the due date.
 - Education officials said that states submitting late or incomplete applications often have not been awarded SIG grants until shortly before the start of the school year.
 - Education officials also said that some states have not managed timely application processes for districts, resulting in little time for districts to plan and implement interventions.
- Districts in states that receive late approval have little time to plan and implement reforms*.
 - Some district officials told us that although time frames for grant approval have improved, they will still be a challenge for SY 2011-12.
- Education officials recognized that there are still challenges with SIG time frames, but have not yet identified additional action steps to address these issues.

*According to specialists in school reform, schools should have at least 4-6 months planning time, so that an assessment of school needs can be conducted in the prior school year, better informing SIG planning efforts.

Finding 3: Education Oversight



Education Uses a Variety of Strategies to Oversee SIG and Plans Additional Data Collection

- Education uses a variety of strategies to oversee state and district implementation
- Education plans to collect performance data

Finding 3: Education Oversight



Education Uses Variety of Strategies to Oversee State and District Implementation

- Education reviews and approves state plans for SIG prior to awarding grants
- Education plans to conduct on-site monitoring of 12 states in 2011.* The agency:
 - selected states in 2011 using previously-established schedule for Title I monitoring;
 - is currently developing criteria for selecting states to monitor in future years;
 - visited state educational agencies, districts, and schools, meeting with variety of stakeholders including parents and students; and
 - is working with monitored states to remedy instances of non-compliance and identify areas where states need technical assistance, according to Education officials. Education also used monitoring results and other early information to plan regional conferences in spring 2011.
- Education has begun an “Implementation Initiative” in which nine volunteer states receive on-site technical assistance and visit other states for peer-to-peer information sharing.
 - Officials said this also provides an informal avenue for Education to assess quality of states’ implementation.
- In addition, Education posts approved state SIG applications on its Web site to allow oversight and accountability to external stakeholders.

*As of June 27, 2011, Education had completed and published monitoring reports for four states (California, Indiana, Nevada, and Pennsylvania).

Finding 3: Education Oversight



Education Plans to Collect Performance Data

- Education officials said they plan to analyze annual data on SIG schools' performance and identify good state practices.
 - These data include performance data for SIG schools' reading and math achievement goals and leading indicators.
 - Education expects to receive performance data from SY 2010-11 midway through SY 2011-12.
- Education's Institute of Education Sciences also has three studies under way to gather information about the results of SIG:
 - multi-year review of case study states' SIG implementation;
 - impact study of Recovery Act programs, including SIG; and
 - evaluation of Race to the Top and SIG implementation.



Conclusions

- District and school accountability for academic progress through the grant renewal process is a key component of SIG, and Education’s guidance provides states with flexibility in designing renewal processes. As states implement these processes, it will be important for states to use renewal criteria that capture whether schools’ intervention efforts have the potential for academic progress.



Conclusions

- The SIG application process has not allowed some districts and schools the time needed to adequately plan and start implementing reforms before the start of the school year.
 - Education's recent efforts to address these challenges improved SIG application process time frames. However, some states' SIG applications were still not approved as of late June 2011, when implementation was set to begin in the 2011-12 school year.
 - Unless Education takes steps to ensure that districts and schools have sufficient time to implement SIG grants, short time frames may impede districts' and schools' ability to improve.
-



Conclusions

- While Education has a number of strategies to oversee states' SIG implementation and collect information, it will be important for Education to also use forthcoming annual performance data to identify challenges and target assistance to states and districts.
- Success of such efforts will be important, particularly due to capacity challenges in some states, districts, and schools.



Recommendations

- To provide districts and schools more time to plan and implement SIG reforms, the Secretary of Education should consider options to have SIG grants awarded to districts earlier, such as:
 - using an earlier deadline for state applications; or
 - approving state applications with timelines that allow for earlier awards to districts.

Appendix II: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

WASHINGTON, D.C. 20202

July 20, 2011

Mr. George A. Scott
Director, Education, Workforce,
and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Scott:

I am writing in response to the recommendation made in the Government Accountability Office (GAO) draft report, "*School Improvement Grants: Early Implementation Underway, but Reforms Hindered by Short Timeframes.*" (GAO-11-741) I appreciate the opportunity to comment on the draft report on behalf of the Department of Education.

We appreciate the time that your office devoted to reviewing the administration, implementation, and oversight of the School Improvement Grants (SIG) program. The views of our grantees are important to us in understanding the impact of the SIG program and its overall goal of turning around our nation's persistently lowest achieving schools.

There are some discussions in the report that the Department believes could benefit from additional clarification. We discuss each of these areas below. In addition, we are enclosing suggested technical edits to the report.

GAO Recommendation: *To provide districts and schools more time to successfully plan and implement SIG reforms, we are recommending that the Secretary of Education should consider options to have SIG grants awarded to districts earlier, such as using an earlier deadline for state applications or creating deadlines for state approval of district applications.*

Timeline: With regard to GAO's conclusion that LEAs and schools need more time to plan and implement reforms, we were pleased to see that the report points out that the Department recognizes that the timeline for SIG implementation was challenging – particularly for the fiscal year (FY) 2009 cohort. There were many factors contributing to

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the delay in making SIG grant awards – some under the Department’s control and others under states’ control.

The Department’s top priority was to approve high-quality state applications aligned with the SIG requirements. Given the SIG program’s dramatic revamping in FY 2009, states and districts needed additional support in understanding and complying with the new requirements. The Department provided extensive technical assistance to states before and throughout the application process to assist states with understanding the new requirements and providing detailed feedback on the portions of their application that were not approvable. The back-and-forth with states took some time given the new requirements.

To better address timeliness in FY 2010, the Department improved the SIG application to make it a user-friendly fill-in form and allowed states to “cut and paste” sections from their FY 2009 application. The Department also released the application two months earlier than in FY 2009. Even with these improvements, there was widespread staff turnover in many state educational agencies at the time the application was released, which contributed significantly to delays in states’ submitting and securing approval of their application. This being said, we are in the process of reviewing the FY 2010 application process to determine what additional steps the Department could take to facilitate future reviews and to support effective SIG implementation.

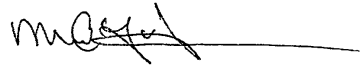
In addition, we would like to respond to two additional points in the report.

Rural Challenges: The report states that “some rural districts have inadequate resources which makes it difficult to compete for funding with districts able to hire professional grant writers.” (p. 25) The Department has been actively tracking the data available on SIG schools and has learned that, while rural schools represent only 16 percent of the schools that were eligible to apply for SIG, they represent 24 percent of the schools that actually received the funds. These data suggest that rural schools did indeed have the resources to apply and be competitive for SIG funds. We are pleased that this is the case and will continue to work with rural schools to ensure they are able to compete on a level field for SIG and other grant programs.

Using Data to Inform Decision Making: The report notes that “it will be important for Education to use these data [it currently is collecting on SIG implementation] to identify challenges and target assistance to states and districts, . . . particularly due to capacity challenges in some states, districts and schools.” (p. 35) The Department would like to note that it has actively used SIG implementation data to inform technical assistance. For example, in the spring of 2011, the Department hosted four regional capacity-building conferences to support grantees in implementing SIG in their schools. The topics for these conferences were selected based on data we gathered from monitoring, technical assistance calls with states, the SIG evaluation study baseline report, the Department’s comprehensive centers, and in-person meetings with grantees. There were over 1,200 attendees among all the conferences, representing state, district, and school staff. The Department is using the survey data from these conferences to inform future technical assistance.

We appreciate the opportunity to review the draft report and comment on the recommendation.

Sincerely,



Michael Yudin
Deputy Assistant Secretary
for Policy and Strategic Initiatives

Enclosure

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

George Scott at (202) 512-7215 or scottg@gao.gov

Staff Acknowledgments

In addition to the contact named above, the following staff members made important contributions to this report: Elizabeth Sirois, Assistant Director; Scott Spicer, Analyst-in-Charge; Melissa King; Salvatore Sorbello; and Barbara Steel-Lowney. In addition, Jean McSween, James Rebbe, Tom James, and Kathleen Van Gelder provided guidance on the study.

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