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MEMORANDUM

DATE: October 30, 2014

TO: TechMIS Subscribers

FROM: Charles Blaschke, Suzanne Thouvenelle, and Blair Curry

SUBJ: Comments on Proposed SIG Regulations; Redefinition of Scientifically-Based Research; Common Core Sales Tips; OCR Guidance and Unintended Effects; Head Start Curriculum Consumer Report; Afterschool Programs; and Recent Grant Awards

The first of three TechMIS Special Reports identifies and analyzes comments from major education associations, including the Council of Great City Schools, on the proposed new School Improvement Grant regulations (see September TechMIS Special Report); they generally agree on the need for greater flexibility in SEAs selecting schools in "Greatest Need" (e.g., specialized and alternative schools) and interventions under new Congressionally-mandated SEA "homegrown models," and the other new SIG intervention. Some comments from the Council of Great City Schools are likely to be incorporated into final regulations and could have greatest positive implications for most TechMIS subscribers (i.e., some would codify USED guidance which is frequently discounted by SEA officials, creating problems for districts and providers).

The second report summarizes several new surveys of superintendents' perspectives on Common Core and directly-related issues and suggests some sales "tips" in approaching district-level/superintendents for purchasing products and services. Most relate to taking advantage of continuing opportunities relating to preparation for assessments, purchasing aligned curriculum/lessons, and overcoming community and other "resistance" to Common Core.

Lastly, the third report details proposed redefinition in proposed legislation of Scientifically-Based Research (SBR) with respect to selecting products and services. If passed by the Senate, as expected after midterm elections in November, the Strengthening Education Through Research Act redefinition of scientifically-based research (SBR) standards should benefit some TechMIS subscribers; the proposed greater flexibility would not only allow alternative designs for evaluating products and services to determine "what works," but also should reduce costs and

burdens for firms seeking "approvals." However, such flexibility could also leave it up to this Administration to incorporate its <u>interpretations</u> into final regulations and competitive grant applications, which could reduce the "level playing field" for private firms.

The <u>Washington Update</u> addresses issues and developments, some of which have positive while others unintended negative implications, for some TechMIS subscribers.

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  Ranking House Education Committee Democrat, Representative George Miller, Has Called for a "Smart Pause" in Tying Student Scores on Common Core State Standards (CCSS) Assessments to Teacher Evaluations -- Which Takes Much of the "Wind Out of the Sails" of Secretary Duncan's "Teacher Evaluation" Priority

If anyone has any questions, please call Charles (703-362-4689).

Special Report:
Comments on New Proposed School Improvement Grant Regulations by Major Education Groups Called for Greater Flexibility, Especially in Selecting "Greatest Need" Schools and Interventions, but the Bottom Line Question Remains How Many, Regardless of Merit, Will USED Incorporate into Final Regulations?

Three major education associations, Council of Chief State School Officers, Council of Great City Schools, and the Knowledge Alliance, sent comments on the proposed SIG regulations which were due October 8th. While some of the comments were expected depending on the vested interest of their respective memberships or the associations, some of the requests for greater flexibility were shared with justifications among the groups; some of these are very likely to be incorporated by USED into final regulations.

The proposed regulations focused on the two congressionally mandated new intervention models -- whole school reform, "homegrown" SEA approaches models which require the Secretary's approval -- and the new Administration priority "early childhood education" model. Comments on the three new intervention models and recommended reforms with the current existing four prescribed models (transformation, turnaround, restart, and closure), along with other proposed changes are highlighted below.

<u>**Council of Chief State School Officers**</u>
The CCSSO generally supports the three new intervention models with the caveat "The proposed rules are still unnecessarily restrictive and should be modified so as to allow greater ability to use program funds effectively." CCSSO argued that Congress did not intend to "limit each state to a single state determined model…some [states] may believe that different types of approaches would be appropriate in different types of schools (for instance in their rural versus urban schools) or simply find that they have more than one good idea; apart from the four models in the current regulations, for turning around low-performing schools." Moreover, the letter states, "Nor do we believe that Congress in authorizing state-determined models envisioned that the

Department would tie their approval to the large number of requirements included in the notice." It recommends a more flexible approach "so long as the state can make a strong argument for why the strategy will achieve the objectives of the SIG program." In addition, while the CCSSO agrees that "increased learning time" (ILT) requirement in any state-determined model can be an important element for turning around a low-performing school, CCSSO recommends that USED make increased learning time (ILT) a permissive and not mandatory element of state determined models, especially because of the increased "cost burden" for LEAs when SIG funding runs out.

Regarding the addition of Congressionally-mandated evidence-based whole school reform strategies that effectiveness evidence includes two studies that meet What Works Clearinghouse standards, CCSSO supports the requirements as being reasonable and are in synch with what Congress had in mind. However, the letter urges USED, "We know, however, that the number of strategies that currently meet the requirements is limited and thus urge the Department to undertake and enhance efforts by the What Works Clearinghouse to review and enhance the evidence-base on promising whole school turnaround approaches."

While the group supports the addition of an early learning turnaround model, it argues, "the requirements set forth in proposed strategy are so rigid they are likely to disincentivize LEAs from seeking to implement the new model"; thus, it defeats the Department's objective of encouraging spread of quality preschools. Here, they recommend states be allowed to fund early learning approaches that "do not necessarily meet all the criteria in the proposed rule so long as the SEA can demonstrate these subgrants will meet the state's own requirements for high-quality preschool services from the other recognized standards of quality." The CCSSO would also loosen the inclusion of all component "elements" in any model which allows rural school flexibility as well as any suburban or urban schools facing similar challenges in all of the element requirements.

Council of Great City Schools
The Council of Great City Schools, whose 67-member districts have served the majority of SIG schools over the last 15 years, shared its experience, problems, and recommendations for improving the overall SIG program. The Council's surveys and case studies have identified practices in about two-thirds of their successful SIG schools; it found that in these schools, the focus has primarily emphasized instructional reforms more so than structural and personnel changes, which initial and current SIG regulations and guidance require and emphasize.

The SIG initial guidance favored school-by-school improvement and funding approaches resulting in a lack of district-level direction and coordination, which the Council argues has reduced the prospects for sustainability and systemic reforms. Hence, one of its overall recommendations has been to reduce individual school autonomy, especially those using transformation models and provide more direction and responsibility at the district level. The letter chastises SEAs in some instances for pursing the school-by-school autonomous policy, even though recent changes in Federal guidance now holds LEAs responsible for individual school progress. The Council recommends that the regulations clearly codify this guidance; provide for more authority for the district in use of SIG funding allowing districtwide reforms

that enable the most effective and efficient way of turning around individual SIG schools. If incorporated into the final SIG regulations, this change would create more centralized decision making and purchases of products, which could have significant implications for some TechMIS subscribers.

The Council strongly supports a new requirement that the LEA should be responsible for recruitment, selection, and the accountability of external providers as some autonomous SIG schools have "contracted with experts without appropriate school district involvement." And, while the Council does not support adding further requirements to the SIG framework, "This new requirement on external providers is warranted."

Regarding the new "state-determined" intervention model authorized by the FY 2014 appropriation legislation, the Council argues that proposed state selected models be based on substantial evidence that the "approach can remedy the academic deficiencies that caused a school to be identified as persistently low-performing or a priority/focus school." Questioning the need for a state-determined model to have elements of the Turnaround and Transformation models, "the Council believes that there may be benefits to implementing other instructional approaches in low-performing schools that have sufficient evidence to hold promise of positive results." The Council's long-standing position has been that SEAs, for the most part, reduce and constrain district flexibility in an unnecessary manner and that the five percent set-aside for SEA should be reduced.

Regarding the whole school reform model, the Council cites the Congressional Committee Report which suggests that no whole school strategy would meet the "evidentiary standard of more than one experimental or quasi-experimental study effectiveness and be comprehensive enough to address the variety of other schoolwide factors cited in the congressional committee report as well." Districts which propose using a whole school model should demonstrate they have met "standards of evidence and comprehensiveness." The Council also supports the requirement the model has to demonstrate effectiveness "with a population and a setting similar to a school to be served."

Based on its years of experience, the Council has argued that when an SEA identifies schools in "greatest need for SIG funding" that "specialized" and "alternative schools" identified under the lowest five percent criteria should not be included as SIG schools, as they are not "appropriate for the purposes of the School Improvement Grant program and negatively skews the overall academic outcomes of the program nationally." For a variety of reasons, these specialized and alternative schools should not be considered under the current definition of "greatest needs" and that SEAs should have greater flexibility in deciding whether to include them in the SIG program. This particular recommended change will likely receive important consideration for USED incorporation into final regulations. One implication for TechMIS subscribers is that "solutions" in some high demand schools will be more uniform requiring less customization.

While the Council was somewhat "lukewarm" in its support for proposed regulations on whole school reform and state-determined models interventions, it argues that the early learning model

"is not appropriate as a school turnaround strategy under Title I section 1003 and is unnecessarily prescriptive." As the comment document states, "The Council supports expanded preschool efforts [the current Preschool Development Grants], but the language in the proposed regulations does not make sense." As a result, it recommends that the "early learning model and the high-quality preschool definition should be deleted."

The Council recommendations include a number of clarifications including:
- Allowing districts to target "feeder" schools with interventions under the Transformation model;
- Clarifying what is federally required and what is not, as spelled out in guidance and policy letters under the Transformation model;
- Allowing districts to upgrade or incorporate technology as a "permissible" activity under the Transformation model (i.e., interventions and infrastructure);
- Allowing SIG funds to be consolidated with Title I in SIG schoolwide programs (SWP), which would codify flexibility which is now only in SIG guidance (e.g., including supplement-not-supplant requirements).

While the recommended changes and clarifications included in the Council's comments reflect the urban districts' perception of needs and solutions, as expected, the comments also reflect years of survey studies and case studies of what makes SIG schools work. As a result, some of the recommendations based on evidence and experience of the Council member districts are likely to receive greater attention and consideration from USED in developing final regulations for the SIG program.

Knowledge Alliance
The Knowledge Alliance, which represents the research and evaluation community for the most part, agreed with "much" in the proposed regulations and, in particular, "the continued emphasis on high-quality professional development, evaluation, and implementation of research-based practices across the program models." This comment is not surprising. However, it did recommend amendments to the proposed regulations in three areas, the first of which was "allow more than a single state-determined evaluation strategy and provide states more flexibility in developing such models." Echoing supporting comments from the Chief State School Officers, the Alliance also agrees that such strategies should allow multiple strategies within the state." Based on the experience of the regional education labs and centers states should be able to "seek approval for a menu of strategies from which they and their LEAs could select based on specific circumstances and needs…it is unlikely there will be a single turnaround strategy that works in every context."

Another recommendation emphasizes the importance of professional development for school leaders. Based on the experience of its labs and centers more professional development should focus on principals and other school leaders, particularly if a new principal takes over a SIG school and has to implement a specific turnaround strategy. As a result, the Alliance recommends that the regulations specifically provide high-quality job-embedded professional

development for teachers, the principal, and other school leaders, particularly under the turnaround, transformation, and the new early learning model interventions.

To fulfill SIG potential, the Alliance argues that a careful evaluation of the "quality of implementation" and "impact" of turnaround strategies must be conducted to determine not just what works, but why. Even though the SEA receives a five percent set-aside for administration, technical assistance and evaluation, the Alliance argues that the first two functions could absorb most of those set-aside funds. Hence, it recommends requiring LEAs to provide for rigorous independent evaluations; that sufficient funds are included in an LEA budget to not only "implement selected interventions fully," but also to ensure "sufficient funding for a rigorous independent evaluation of the implementation and the impact of services and activities supported with those funds in each such school."

The Knowledge Alliance argues that written regulatory requirements by themselves do not drive quality and outcomes and that the quality of implementation of any turnaround models: "Thus we urge the Department, through its application review, monitoring, and technical assistance activities, to make a strong effort to ensure SIG projects are implemented in a manner intended by the regulations and with fidelity to research-based models."

The additional requirement of using independent evaluators to not only assess whether an intervention works, but if and whether the intervention was implemented with "fidelity" in accordance with the specific research phase intervention would certainly benefit the research and evaluation community members as well as some subscribers whose "programs used in SIG schools are not implemented as intended." Also as noted in a related item, reauthorization of the Institute of Education Sciences Act would allow research labs and centers to compete for grants and contracts in areas beyond their primary missions as currently designated.

Implications
Some of the recommended changes by the three associations with greatest vested interest in SIG could have direct implications for many TechMIS subscribers.

If the Council, CCSSO, and the Alliance comments to allow more than one "homegrown intervention strategies" be used in a state and allowing modified interventions addressing specific school needs are accepted, then the more opportunities for more firms with interventions or elements/components would increase; and, if the definition of "greatest need" is changed, as recommended by the Council, then the new competitions will likely involve more "regular" rather than "specialized," or "alternative" schools. Moreover, some of the existing SIG "alternative" or "specialized" schools which are not making progress could be dropped. Also, if some of the existing guidance flexibilities are codified into regulations, then not only would such flexibilities be more uniformly "accepted" by SEAs and LEAs, but also more solutions, partial or whole, by more vendors would be provided. For example, if districts were to be solely held accountable for individual school results and hence would have more decision-making power over how more funding at the district level would be used, then marketing/sales approaches would be impacted. However, the question remains as to what changes will USED include in the

final SIG regulations and when will these regulations become effective.

Special Report:
New Survey on Superintendents' Perspectives on Common Core and
Directly-Related Issues Suggest Some "Do's and Don'ts" for
Sales/Marketing Approaches Targeting Superintendents for
Purchasing Opportunities

The Gallup/Education Week survey of more than 1,600 superintendents between August 4-18 provides useful insights on their perspectives, which in turn suggest "tips" for sales and marketing officials to use in approaching superintendents for sales opportunities.

The August survey focused on a number of areas offering emerging opportunities, the most significant of which is Common Core State Standards (CCSS) and assessments. The survey found 73 percent of superintendent respondents felt the CCSS standards were "just about right" for challenging most students, while only eight percent felt they were "too challenging." According to Education Week (September 29th), the 73 percent represented an increase from 66 percent on the same question on an earlier Gallup survey released in July 2014. A number of other surveys and reports suggest that the students challenged most by Common Core Standards will be students with disabilities (SWD) and/or English Language Learners (ELL), which constitute about 15 to 18 percent of total enrollment; assessments for these students are still under development by several consortia. These alternative exams have only been partially field-tested and will likely not be implemented until after the initial 2015 main "summative" assessments are given. In approaching superintendents, firms should take into account this important consideration. For example, in this survey, another question related to perceived teacher preparation to support SWD and ELL students which may be "most challenged," only 15 percent of superintendents felt teachers were "adequately prepared," while 39 percent felt they were "somewhat prepared."

As Education Week noted, the August survey for the first time asked superintendents about their support for Smarter Balanced or PARCC consortia exams. Sixty-four percent of superintendents feel that states should not "pull back" from their Common Core consortia membership, while 20 percent said they should pull back," as an increasing number of states are doing so one way or

another. While 16 percent said they did not know whether their state should "pull back" from the Common Core consortia, it is unclear whether superintendents in states which are developing their own assessment or are using commercially available assessments have similar perspectives and preferences. In these states, whether a firm's curriculum, lesson plans, etc. are aligned with Common Core <u>standards</u> may not be as important to superintendents as their degree of alignment with the respective <u>state</u> <u>assessments</u>. Since many of these state tests have yet to be completely developed, it is important that firms' positions their offering be "flexible" and easy to "accommodate differences" among the states' new assessments.

For firms that approach school board members and superintendents, the survey found that about 44 percent of respondents "strongly agree" with the statement, "I am confident that my school district is well governed at the board level." This finding should suggest that almost half of the superintendents and school board members in a district could be approached collectively without expecting different preferences and opinions between the two groups.

With respect to college and career-readiness standards, the survey also asked superintendents about the degree of collaboration between their district and local higher education institutions, with slightly over two-thirds indicating that "some collaboration is occurring." When asked about specific areas in which collaboration is occurring, a large majority (83 percent) said collaboration on dual enrollment has occurred; however, as the Center on Education Policy and other surveys have found over the last four or five years, collaboration in other areas is significantly less. For example, only 37 percent of superintendents said some collaboration has occurred in course alignment; and 33 percent reported some collaboration regarding student tutoring or mentoring programs. Collaboration regarding summer on-campus programs <u>and</u> teaching and assessments were reported by 33 and 22 percent of superintendents respectively. As numerous studies have found over the last several years, the growth of student tutoring and mentoring at the K-12 high school level and "remediation" at the college level continues to expand; and these represent significant niche markets for many TechMIS subscribers (see February 20, 2014 TechMIS Special Reports). Even though an objective of the career and college readiness goal of state standard reform is to remove the need for college remediation, it is likely that college remediation type activities (e.g., on-call remediation in college freshman courses rather than separate developmental courses) will continue to grow. Where such collaboration between K-12 and high school is high, one can expect a continuum of similar programs could be jointly funded by collaborative partners. On the other hand, where such collaboration is minimal, then the new markets will likely have to be approached separately.

The Common Core standards movement has certainly contributed to the growth of the professional development market. About 90 percent of superintendents "strongly agree" or "agree" that principals now take an active role in determining professional development priorities, while 74 percent feel teachers take such a role in determining professional development priorities. While almost half of the superintendents feel that their district has sufficient time allocated for teacher professional development, slightly less than half feel that there is not enough time allocated. These findings suggest that superintendents most likely "rely" heavily on principals and teachers to determine priorities for professional development.

However, finding time for professional development remains a major cost consideration in selecting approaches (e.g., reducing the cost of having teacher aides cover classrooms while teachers receive PD, which in many districts, represents almost half the cost of PD training). On demand, at teacher convenience, types of online or blended learning continue to grow, according to most surveys, with varying degrees of success.

The superintendents also reported a number of the types of professional development activities which are offered to teachers in their districts, with the most being improving informal dialogue to improve teaching (91%), courses and workshops (90%), and education conferences and seminars (89%), mentoring and peer observation (83%), reading professional literacy (75%). Other activities included visits to other schools (66%), reliance on a professional development network (61%), and individual and collaborative research (42%). Various opportunities exist for firms which have products or services that could fit into one or more of the widely-used activities. Relying on a number of other surveys, especially the Education Market Research longitudinal surveys, we estimate that between 20 and 25 percent of overall K-12 professional development expenditures were used to purchase services from for-profit organizations with a growing amount -- perhaps 25-30 percent -- going to non-profit organizations and entities. The remaining expenditures are for district-sponsored activities (mentors and reading coaches, informal dialogues, observation visits, among others), and for using teacher aides to cover classrooms when teachers are in webinars or other onsite training activities. It is interesting to note that one of the priorities built into several Federally-funded programs, for example Title II, 21st Century Community Learning Centers, among others is creation and use of teacher collaborative activities which superintendents report is currently one of the least used PD efforts.

Superintendents were also asked to identify professional development topics which they explored for use with their teachers and principals in the last two years. According to superintendents, use of technology in instruction was "explored for use" with teachers (94%) and principals (86%). Eighty percent or more superintendents mentioned other areas that were "explored" with teachers -- curriculum training (84%), interpretation of data (83%), Common Core state standards (81%), and bullying and harassment (80%). Less "explored" areas for teachers included social emotional learning (34%), mental health (28%), and social media (41%). Only 17 percent of superintendents reported child development was a topic explored. These areas for the most part are considered to be a moderate to high priority among many of the Administration's flagship programs.

One of the critical components of the Common Core assessments being developed by the two consortia are formative assessments. The survey found 38 percent of superintendents "strongly agree that they have sufficient data on student outcomes to make strategic school district decisions; however only 15 percent strongly agree that student data is received fast enough to inform instructional strategies for students." Brandon Busteed, Executive Director of Gallup Education Division, as reported by Education Week (September 29th) said, "We collect a lot of data in education that goes up the chain for accountability and nothing ever comes back down. These leaders want more formative data that's more actionable and a lot of the accountability measures are not helping them do that." From reported media accounts it would appear that the

highest priority among the two consortia during the first year of implementation of their respective exams will be placed on summative assessments rather than formative assessments which they are planning to implement later. It would appear that the district demand now is for more formative assessments and data, which could provide opportunities for firms in the immediate future. Recent surveys (e.g., SIIA, 2013) show this is an area of increasing growth in the market place.

While the national media and USED has justified many of the Administration's reform initiatives on international education comparisons such as results (???) PISA, nearly half of the superintendents agree that knowledge about how other countries are improving schools is important, but about 61 percent "agree" or "strongly agree" that school systems around the world are too different to rely on international comparisons for school improvement." Only four percent strongly agree that international test comparisons are critical for policy reforms for the U.S., and only two percent "strongly agreed" international comparison tests accurately measure student achievement across nations. This surprising finding suggests that many results of use of specific products in foreign countries/markets are not important in approaching U.S. superintendents.

Update 10/21/14:
During the spring, the Center on Education Policy (CEP) released the results of its survey on district-level perceptions of progress and challenges on Common Core Standards. The national representative sample of 211 districts included many questions asked in a CEP 2011 survey. While many of the CEP findings corroborate the Gallup/Education Week survey above, other findings have implications for TechMIS subscribers.

Like the Gallup/Education Week poll, compared to its 2011 survey, CEP found that more district leaders feel the CCSS are more rigorous (90%) and will require new or substantially revised curriculum materials and new instructional practices (80%). Moreover, nearly three-quarters of district leaders agreed CCSS will lead to improved skills in math and reading. About half of the district leaders feel that actual implementation of CCSS-aligned textbooks and other instructional materials would not occur until school year 2015-16 or later, with the others reporting adoption would occur earlier.

Among the challenges confronting districts, more than 90 percent reported experiencing major (67%) or minor (25%) challenges with finding adequate resources and finding enough time to implement were a major or minor challenge (89%). Eighty-six percent or more district leaders reported having major or minor challenges with adequate staffing to implement all aspects of CCSS, identifying or developing curriculum materials, and providing high-quality professional development for teachers.

For the first time, CEP addressed assessment challenges and reported that more than 90 percent of districts in CCSS adopting states felt this was a major or minor challenge; and in states scheduled to adopt Smarter Balanced or PARCC assessments finding funds to acquire

technology infrastructures was a major or minor (46%) challenge. About 70 percent of district leaders felt overcoming <u>internal</u> resistance to CCSS (41%), and a similar percentage found <u>outside</u> resistance were major or minor challenges. About 60 percent expressed concerns about SEA officials uncertainty that their state would "pull out" of a consortia or put consortia assessments on "hold" was a major or minor challenge.

The CEP survey also included questions about district leaders' perception of collaboration on relevant CCSS-related matters and with whom. Similar to the Gallup/<u>Education Week</u> survey findings in the CEP survey, only 11 percent of districts have "reached out" to Institutes of Higher Education to work with the district in implementing CCSS. This finding strongly suggests that the firms selling remedial or developmental education programs to either district secondary schools or colleges/universities use sales approaches focusing separately on both customers with the identical or similar program.

While a large majority of districts collaborated with one or more entities, most efforts occurred with "other districts in the state" in the areas of teacher and principal training and the use of CCSS assessment data to inform instruction (i.e., more than 85 percent of the cases). In the area of professional development relating to aligning curriculum, using assessment data to inform instruction, or preparing principals to be instructional leaders, the greatest collaboration was with districts, followed by SEAs with little collaboration with districts in other states, non-profits, and Institutes of Higher Education. This finding suggests that having high-quality implementations of professional development programs, instructional materials, etc. with districts within the state to serve as "reference sites" could be an important means of marketing relying on district "mouth-to-mouth communications," especially during in-state conferences to facilitate collaboration.

Special Report:
The Strengthening Education Through Research Act, if Passed by the Senate as Expected in November, Redefines Scientifically-Based Research (SBR) Standards and Provides Greater Flexibility, Which Can Be Good News for Many TechMIS Subscribers; However, it Leaves it Up to USED to Incorporate its Interpretations into Rules, Guidance, and Competitive Grant Preferences

Under the HR 4366 ESRA "scientifically-based research" standards would be replaced with "the definition of, and references to, 'principles of scientific research.'" The types of evaluation and research designs meeting the "principles of scientific research" are broader than the initial narrow definition of Scientifically Based Research (SBR), which was mentioned more than 100 times in the 2002 No Child Left Behind Act. Initially, SBR was defined operationally by the Administration and a Contractor, the University of Oregon, quite narrowly as it applied to direct instruction type programs, which could be funded as a core program under Reading First. Subsequently, the definition was expanded to include supplemental materials aligned with acceptable SBR-approved core instructional programs; and then following the Institute of Education Services (IES) procedures for the What Works Clearinghouse, it was redefined once again using the rigorous gold standards of Randomized Control Trials (RCT) (i.e., experimental and quasi-experimental designs) as being the most rigorous evaluations. When the RCT evaluations met the rigorous design standards and the products being evaluated were found to have positive results, then USED officially or unofficially would include such products and practices in its "official" (and sometimes unofficial) approved list. Subsequently Congress accepted alternative definitions and types of evaluations, and these were included in Head Start, and Higher Education Act. The most recent "re-definition" was included and used in so-called "tier evaluations" under the i[3] program to fund non-profit grantees. To say the least, changing definitions of rigor and accepting different evaluation and research designs created uncertainty for firms with products, which they alleged to be effective and felt should be included in "lists" or best practice guides. In addition enormous costs and other burdens were placed on such firms to hire third-party evaluators to get their products reviewed and approved.

The "principles of scientific research" replaces the SBR definition and attempts to clarify acceptable types of evaluation and research design, which could result in valid findings that identify effective programs and practices. In fact, many of the alternative principles reflect positive elements of previous SBR standards and types of designs, as noted below.

The new "principles of scientific research" in the IES reauthorization are designed to outline the parameters of approaches to present findings and make claims that are appropriate to, and supported by the methods that have been employed; it includes: "…(iii) reliance on measurements or observation methods that provide reliable and generalizable findings; (iv) strong claims of causal relationships only with research designs that eliminate plausible competing explanations for observed results, such as, but not limited to random assignment experiments…(vi) acceptance by a peer review journal or critique by a panel of independent experts through a comparably rigorous objective and scientific review; (vii) consistency of findings across multiple studies or sides to support the generality of results inclusions."

Comment [S1]: Charles, not sure how to refer to principles as plural or singular; can the referent to [it} be consistent? In the phrase above I changed it because principles is plural; however, you may be quoting this entire section, if so just leave it as is.

Other principles of scientific research, which have been followed by USED in a less controversial and generally more accepted manner include the use of rigorous systematic and objective methodologies to obtain reliable and valid knowledge; use of data analyses that are adequate to support general findings, and consistency of findings across multiple studies or sites to support generalizability of results and conclusions, and presentation of methods in enough detail to "allow for replication or provide opportunities to build systematically on the findings of the research."

Several elements were built into the "tiered evaluation" designs used in the Investing in Innovation (i^3) program, especially for funding "validation" and "scale-up" grants. Some of the other elements were subsumed under seven different acceptable models that were included in the most recent reauthorization of the Higher Education Act. Such designs included the most rigorous (RCTs) and "gold standards" employed by the What Works Clearinghouse to designs which rely heavily on objective observations in the use of case studies for certain types of products and services.

As Sarah Sparks in her Education Week blog *Inside School Research* blog wrote on August 27th, "In place of the label [NCLB randomized control trials as the gold standard] many expect the next generation of the law to adopt a more flexible definition of "scientifically valid research," a term already used in the new Head Start and Higher Education Act reauthorizations which "include applied research, basic research, and field-initiated research in which the rationale, design, and interpretations are soundly developed in accordance with the principles of scientific research." Moreover, as she argues, "The Obama Administration is taking a more holistic approach, pushing a tiered evidence format in programs like Investing in Innovation (i^3) in which different levels of evidence are used at different stages in the development and evaluation of a program or intervention. That approach has gained traction in both new IES grant criteria, as well as new Education Department operating rules [EDGAR]."

The joint statement issued by Senator Tom Harkin, Chairman of the HELP Committee and ranking Republican Senator Lamar Alexander praised the committee-passed reauthorized Education Science Reform Act (ESRA), stating, "This legislation authorizes funding for the research activities of the U.S. Department of Education, including the Institute for Education Sciences, and will help improve the quality of education research in the United States and make research more relevant and useable for teachers, school leaders, and school administrators." Clearly, during the last decade, the high bars of research and evaluation rigor followed by the What Works Clearinghouse were designed to improve the quality of research more so than provide guidance to practitioners in selecting products and services which work. The "tiered evaluation" approaches used in the i^3 program were designed to continue the development of a capacity among researchers for rigorous quality research and evaluation, and were used primarily by the Federal government in deciding which practices were most appropriate for "scaling-up" (the most rigorous evaluation designs) down to "exploratory" less rigorous designs. Moreover, the non-profits that developed the new products were also selected for "scale-up," which some observers, for example Frederick Hess of The American Enterprise Initiative, felt should have provided a more level playing field by including for-profit organizations to implement the "scale-up" grants. The legislation creating the i3 program strongly discouraged such funds going to for-profit organizations or even to be used for testing some of their promising practices and products.

The "scientific-based research" allowable models for determining efficacy were built into the Higher Education Act 2008 and were drafted primarily by former HELP Committee Chairman Senator Edward Kennedy's staff, led by Roberto Rodriguez who has been for several years an Education Advisor on the Domestic Council for President Obama. Those models have the major goal of helping practitioners by offering the necessary research to provide guidance to users and K-12 district decision-makers in selecting products and practices.

The key question is how will USED operationally define "scientifically valid" following the "principles of scientific research" in implementing the new law? It is clear that Congress is not satisfied with sole reliance on randomized control trials (RCT) or the high bar currently used by the What Works Clearinghouse. It is important to note that the recent SIG guidance for districts in selecting congressionally-mandated "whole school reform models" requires groups, including for-profit organizations, which have developed and/or acquired whole school reform models which had already met USED provisions standards (during the 1997-2000 timeframe or even during the early years of the What Works Clearinghouse), will have to once again submit applications for review as pointed out in our September TechMIS Special Report. In her *Inside School Research* blog on Education Week, "School Improvement Means What Works Clearinghouse is About to Get a Lot Busier" Sarah Sparks quoted Ruth Neild, Associate Director for the National Center for Evaluation who heads the What Works Clearinghouse as saying, "It is really exciting; it's our first foray into formula funding and we're raring to go." According to Sparks, Neild also said, "At least three programs, including Investing in Innovation grant winner, Success for All, are already likely to make the cut." While USED guidance under the SIG program refers to "valid research" conducted by What Works Clearinghouse, it also says that it

will consider research conducted by other similar "entities." An immediate question is what are the criteria that will be used by those reviewing whole school reform model applications? The question in the longer run remains, how will USED interpret and operationally define the "principles of scientific research" evaluation and research models?

If USED relies heavily on its interpretation of the tiered evaluation approach used in i[3] -- how much, if any, of the non-profits' operational procedures, definitions, GNA, overhead, etc. will be applied to for-profit organizations, which would de facto limit for-profit participation.

Beyond the new definition of scientifically-based research, there are a number of other mandates in the proposed Institute of Education Services reauthorization that should be of great interest to some TechMIS subscribers.

One of the new mandates assigned to the National Center for Education Research is "to collect data and report on the impact of technology on education, and the quality of the implementation of practices and strategies determined to be effective through scientifically valid research." Also, NCES has to report on successful state and local education reform activities, which "may include research on social/emotional learning." The attempt in 2003 by the IES/What Works Clearinghouse to evaluate the effectiveness of technology-based interventions was a total disaster as the contractor Mathematica Research overlooked the quality of implementation of the different technology-based interventions, which were randomly assigned to experimental and control schools. The emphasis on social and emotional learning in NCES research reports would appear to be especially timely as the Administration attempts to find "loose" money for competitive grants that are designed to implement social/emotional learning (SEL), safety, and other school climate interventions. The act would also require NCES to not only collect data on school climate, access to the use of technology to improve elementary and secondary schools, but also the quality of early childhood education and students' and access to summer school.

Second, the relatively new National Center for Special Education Research would be required to promote scientifically valid special education research and in doing so "examine innovations in the special education field such as multi-tiered systems of support." One can expect more research to be conducted in the use of response-to-intervention and coordinated early intervening services to be conducted with the intent of expanding such interventions to other program areas (e.g., Title I, III, and 21st Century Learning, among others).

Third, Part F of the General Provisions reiterates that USED/IES is prohibited from "using IES funding to endorse, approve, coerce or sanction any curriculum design to be used in early education or in elementary school, secondary school or IHE." This provision could have an impact on USED's interpretation of the "principles of scientific research" and subsequent implementation guidance which could result in a more "level playing field" for potential grantees or firms being able to get on official or unofficial USED "list" (see related Special Report).

And last, the proposed act would provide greater flexibilities to USED regional labs and centers and other entities to compete for contracts, grants in areas beyond their centers' current major

focal points and missions. Hence, some TechMIS subscribers could be confronted with an increase in competitors for a variety of contracts with districts and/or states in the future. As the Education and Workforce Committee Bill summary states, "The bill eliminates the specific topics listed in the statute that must be examined and the number of required centers." It provides more flexibility for labs and centers to compete for contracts in district competitions.

Update:
In an October 27th Huffington Post (October 27th) article, Robert Slavin, Executive Director of the Success for All Foundation, recommended that USED use its "bully pulpit" to promote programs that meet the new EDGAR standards and remove those programs from the What Works Clearinghouse "list" that "no longer exist or that do not have anyone providing training and materials similar to those provided in the successful studies. The remaining programs would represent a good starting list of programs that, if implemented well, would be likely to have positive impacts on student achievement."

In our September TechMIS Special Report, we raised the question whether whole school reform models developed and "approved" by USED several years ago, which have been acquired by other firms, including some TechMIS subscribers, would continue to qualify as a whole school reform model under the newly proposed SIG regulations, even though the original developer, training and personnel and materials are no longer available in the original form.

In conclusion, Dr. Slavin predicted, "Over time, such a policy [noted above] would also encourage developers and researchers to create and evaluate programs likely to meet EDGAR standards, and it could help build political support for investments in R&D that ultimately result in better outcomes for children on a broad scale." Dr. Slavin is also the Director of the Center for Research and Reform in Education at Johns Hopkins University, and during the first three rounds of competitive grants under the i[3] program, which used the "tier evaluation criteria," Success for All received more than $100 million in grants or subgrants.

Washington Update

New USED Civil Rights Guidance to Districts to Provide Minority and Disadvantaged Students Equal Access to Technology Resources Could Result in Legal Remedies Which Could Have Unintended Effects

Relying on USED's Office of Civil Rights (OCR) recent reports on resource disparities between disadvantaged and other students in access to resources, Secretary Duncan's "Dear Colleague" October 1st letter is the Obama Administration's first set of guidance in the area, according to Education Week (October 1st). To correct the disparities in technology resources between advantaged and disadvantaged students, the guidance suggests legal remedies could follow OCR investigations by its cadre of 750 field lawyers. Among the areas lacking comparability is equal access to and use of the "new technology" called for in the Administration's ConnectED initiative, which relies heavily on Internet availability and digital devices (see July 2013 TechMIS Washington Update). As the letter states, "OCR may evaluate the availability of digital and other instructional materials that enhance instruction, including library resources, computer programs, mobile applications and textbooks…OCR generally considers the number, type, and age of education technology devices such as laptops, tablets, audio visual equipment, among other resources available in the school. This assessment includes the availability and speed of Internet access."

Other technology-related areas that OCR may investigate include the amount and type of technology-related professional development available to teachers, the extent to which students have access to necessary technology outside of school, and how school districts support students who do not have Internet access at home, especially where technology access during after-school hours is a "necessary or presumed aspect of what is expected from students." The letter rightfully argues that technology aligned with curriculum, if used appropriately, "contributes to improved education outcomes and promotes technological literacy." To justify how technology contributes to improved education outcomes, the letter cites several studies and reports, the latest of which was published in 2010, with most of the other studies dating back to 1980, including Kulick's seminal research in using instructional technology, particularly integrated learning systems. However, if one counts the number, quality, and accessibility of technology for disadvantaged students for more than four decades, the number of computers-to-students ratio in Title I programs has always been better than in non-Title I schools.

While the quality of technology use has been questioned by some studies, the relevant question is: how would OCR investigators address that problem? One obvious answer is by considering the level of teacher experience and skills in the use of technology, which should be the focus of any OCR investigation using measures other than average teacher salaries, which is

currently used for measuring comparability in Title I. And, if OCR investigations consider strictly the age of computer programs, some of the older programs or other instructional materials which Kulick studied, which have proven to be successful in the past would be replaced without justification by some of the unproven new technologies and devices recommended in ConnectED.

Unintended consequences of the new guidance could surface in numerous areas, according to Frederick Hess. As reported in *Politics K-12*, he expressed concern that using a new approach such as advanced placement in one school might cause a district to be hesitant to do so if the district could not afford to start it in another school that has different demographic populations. He argued that some schools may think "you are safer not doing anything than doing something unevenly…You are going to make already risk aversive state and local officials potentially even more risk aversive." Such risk aversions could be greater when cost considerations are taken into account.

There are other consequences, mostly unintended, if a legal approach to enforce current laws and regulations is strictly interpreted and enforced, and does not take into account some of the new evolving flexibilities provided in USED "guidance" to SEAs and LEAs. Some of the most important flexibilities in guidance or advisory letters, which now are not considered to be part of the Legal Framework, might have major implications for TechMIS subscribers if they are "overlooked" by OCR lawyers. Examples include:

- Title I guidance since September 2009, allowed most school districts to purchase a product with Title 1 funds for Title I schools, and to purchase the same product for non-Title I schools with other than Title I funds without violating the current supplement-not- supplant provisions;
- Allowing Title I funds to pay for training of teachers in non-Title I schools in districts "identified for improvement" (see September 15, 2009 TechMIS report);
- Allowing Title I schools to pay for services "required by state law" (which would normally violate supplement-not-supplant provisions) using Title I (or even IDEA funds) to implement RTI approaches in schools when RTI adoption is "required by state law" (see August 2012 TechMIS report);
- Increasing flexibility to combine Federal funds in Title I schoolwide programs to be spent in a much more flexible manner without violating "supplement-not-supplant" requirements, as included in numerous USED sets of guidance and Dear Colleague letters; because these have not been included in regulations, many SEAs are "discouraging" such practices.

It is interesting to note that the comments made by the Council of Great City Schools on the proposed new SIG regulations would codify into final regulations the existing SIG guidance which allows any Priority school to be designated as a schoolwide program and thus not have to be subject to strict interpretation of supplement-not-supplant provisions (see related TechMIS Special

Report).

As the USED guidance states, "OCR may exclude these categorical programs [such as Title I or IDEA special education] from data to determine comparability of regular education programs if those resources distort comparisons for such programs." Hence, OCR would not take into account supplemental categorical funding, such as Title I or IDEA special education programs, in determining whether comparability of other resources with other schools are met.

To avoid OCR investigations and legal remedies, the guidance would rely on districts to conduct a "self-assessment" and "proactively" correct situations where violations of the Civil Rights Act of 1964 are in question, based on "strict" interpretation of the Law and regulations. However, as reported in *Politics K-12*, Anne Hyslop, a senior policy analyst at Bellwether Education Partners, noted that, "Putting additional scrutiny on resource inequity is a good thing, but the problem has been so persistent for so long, it will take a lot more than just OCR guidance to fix it."

In order to ensure Congressional intent is met to "ensure equal education opportunity for all students" and allows greater flexibility in using technology and other innovative interventions with students in need, a better approach would be to codify into regulations many of the above noted and other flexibilities included in guidance, of which many SEAs "discourage" districts from taking advantage. This could improve overall Federal program effectiveness. Once these generally-accepted guidance allowances by districts are incorporated into the Legal framework, then many of the "disparities" may remedy themselves,

perhaps more quickly than allowing and requiring legal remedies based on provisions in the Law and current regulations, which are in certain cases dysfunctional and have serious unintended consequences, for many TechMIS subscribers.

New Household Survey Finds that the Demand for Afterschool Program Greatly Exceeds Supply Which Could Pressure Schools to Increase More Offerings (e.g., STEM)

The survey of 30,000 families in the 2014 edition of America After 3 PM, published by the Afterschool Alliance, finds that "for every child enrolled in a program, there are two more who are not, and whose parents would enroll their child if a program was available." The number of children participating in afterschool programs has increased from 6.5 million in 2004 to 10.2 million in 2014. Almost 90 percent of respondent families said they were satisfied with the program for their child/children. About 85 percent support public funding for afterschool opportunities. Ninety percent of respondents were Democrats and 80 percent were identified as Republicans.

According to the most recent household survey, an equal number of afterschool participants are girls and boys, while White students constitute 75 percent, 15 percent are African-American, and 11 percent are Hispanic. Almost half are from households of low-income families, with 20 percent of households having children qualifying for the "free and reduced lunch" program. However, the greatest demand for enrollment is among African-Americans and Hispanic households (e.g., 60 and 57 percent respectively) compared to 35 percent of

White households. Many TechMIS subscribers should be interested in these specific additional findings:

More than 70 percent of households reported their children's' programs offered homework assistance and opportunities for reading and writing, while almost 70 percent provided STEM learning opportunities. On the average, participants spent 7.4 hours per week in afterschool, with the average cost per one in five parents receiving government assistance being $113 per week. Seventy-three percent of respondents reported their child's program is at a public school site, with the largest number of providers being Boys and Girls Clubs, YMCAs, private schools, and religious organizations, some of which have offered Supplemental Educational Services (SES).

About 45 percent of parents were satisfied with their child's homework (47%) and reading and writing (44%) programs, but only 35 percent were satisfied with STEM learning opportunities. About 60 percent of parents reported that afterschool programs provided learning activities not offered during the regular school day, which is a "very important factor in selecting an afterschool program."

In terms of perceived impact on their children, benefits in the following areas were reported: helping complete homework (82%), gaining interest and skills related to STEM (78%), and gaining workforce skills such as teamwork and critical thinking (77%). About 50 percent of the families want their child to participate in summer learning programs today, while in 2013 only a third of families reported that their child participated in summer learning programs.

As we have reported over the last five years, America After 3 PM concludes that afterschool programs have become a growing part of the "STEM education ecosystem," which provide opportunities for "hands-on, interest-driven, and project-based STEM learning for children." While households reported most afterschool STEM programs were a combination (69%), math learning opportunities were available in 60 percent of the cases, followed by science (46%) and technology and engineering opportunities (30%). About 50 percent of the participating children received some STEM instruction "daily" (14%) or "two to three times a week" (38%).

The survey also found about 90 percent of parents were equally satisfied with afterschool programs for high school youth compared to elementary and middle school students. The survey found STEM learning opportunities were a very important selection criteria for parents of high school students (60%), while 58 percent said opportunities for career exploration or readiness were important.

Over the last five years, the growth of STEM-related offerings in afterschool programs has been growing and significant; 85 percent of households with children participating in programs were satisfied with the "afterschool program STEM learning opportunity."

As a policy footnote, the priority the Administration has placed on "extended learning" and "increased learning time" has evolved. On one hand, the Administration has supported "extended learning time," primarily change; and has been confusing by adding additional instructional time during the regular school day (e.g., 300 more hours

-- see related item on SIG regulation comments); with some of the added costs coming out of the 21st Century Learning Community Centers formula program, which traditionally has supported afterschool programs (see related item on SIG regulation comments). On the other hand, the Obama Administration has verbally supported other so called "priority" programs such as Promise Neighborhoods and even SIG components which call for greater proactive community and family participation in the selection of specific programs/topics, particularly in afterschool programs. As a result, the ELT and the "afterschool" communities have been "at odds" over dividing total funds. The survey clearly indicates an increasing demand for afterschool programs, such as those funded by 21st Century Community Learning Centers. According to many recent studies compared to ten years ago, afterschool programs have had positive impacts; this survey corroborates the growing need and similar perceived impact among parent households, particularly as perceived by parents.

ACT Issue Brief Identifies Ways Cheating Can Occur With Online Testing, Reviews Existing State Policies, and Provides Recommendations Which Could Provide Some Opportunities in States that Are Unprepared

The October 2014 ACT Research and Policy Brief entitled "The End of Erasures: Updating Test Security Laws and Policies for Computerized Testing" is a short, but sobering document addressing ways cheating could still occur even though many consider "computer administration would be

seen as a way to avoid many of the test security problems." The brief cites an earlier NCES symposium which concluded that, "Shifting to a new assessment delivery model, such as computer-delivered or even computer-adapted testing does not make cheating and test piracy go away; they merely take a different form." The policy brief analysis argues, "…Many of the test security concerns will be the same. There will still need to be efforts to prevent unauthorized access to secure exam materials, student access to restricted materials, or inappropriate use of accommodations." For computerized administration, a number of risks still exist, such as computer hacking, educators' capacity to change student responses, and the opportunity for students to access the Internet during testing, which appears to be greater when students are allowed to test on their own or "bring their own device."

The brief argues, "It is necessary for states to augment their current test security laws and policies to account for the changes in test security needs." ACT reviewed procedures followed by 16 states, who in 2011 according to SETDA, offered online testing in at least one course or for one population. Six common themes from the states' manuals surfaced: "Storage and secure materials, test access, testing window, student work stations, testing requirements, and specificity." Based on its analysis, the ACT brief found that only two states -- Delaware and Oregon -- had developed state statutes and regulations that related specifically to computer rather than other forms of test administration.

Among the 16 states' manuals, the brief identifies specific procedures addressed in the earlier NCES symposium which were

being followed by certain states in one or more of the at-risk areas during computer administration of assessments. The brief also made specific recommendations for states to reduce the probability of computer-based assessments security breaches. One is to update state regulations as Delaware and Oregon have done to reflect the shift to computer-administered assessments. Efforts to control test access should also be a major priority, and lastly, the states should develop comprehensive manuals which should be a "one-stop shop" for policy questions related to ensuring test security.

As *Fritzwire* notes, recently ACT successfully administered a digital version of the ACT college-readiness assessment and the first ever computer-based administration of a national undergraduate college admission exam which provided direct experience in developing best practices. While most of the national debate has focused initially on adoption of Common Core standards, most recently the media has turned to state selection of alternative tests and related issues; the security and cheating issues related directly to computerized testing are only beginning to surface in public debates. Moreover, these debates have, for the most part, focused on "summative" evaluations with results to compare school districts and states' performance. The current and emerging interest in "personalized learning" reflected in Federal policies have caused a re-focus to "formative" evaluation, which is emerging as a large issue at the district level (see related Washington Update items). Unless test security issues of cheating problems are overcome quickly, several observers feel that "formative" assessments may become more useful than "summative" evaluations. Formative assessments that

provide immediate student performance data to teachers, students, parents and families are more useful for instructional planning, adjusting curriculum activities, and determining the needs for interventions and/or more challenging coursework in targeted subject areas. Studies conducted by SIIA, among others, are showing that district purchases of formative assessments and related services have increased dramatically over the last year and are likely to continue in the immediate future.

As test security problems and issues increase, so could opportunities for some TechMIS subscribers. If cheating examples expand and are identified nationwide (as in the Atlanta public schools recent case), the whole question of Common Core assessments could come into question and become a greater political issue.

Head Start Preschool Curriculum Consumer Report Identifies 14 Different Curriculum Offerings That Meet Some of the 13 Criteria Important To Head Start Programs in Selecting Curriculum

The Office of Head Start has published a new compendium of ratings for preschool curriculum offerings. The report offers the definition of a comprehensive curriculum, which means that the curriculum includes at least two of the five learning domains of the Head Start Child Development and Early Learning Framework; it also outlines the process used in selecting and reviewing those packages, which are included in the Consumer Guide. Authors claim, "[A] diligent effort was made to ensure that all available and published curricula that met the inclusion requirements and were used by

at least some Head Start programs were included in the report. . . ratings should be considered as only one factor in making a decision about curriculum."

Thirteen criteria were used in the review process, and each curriculum package was rated on all 13 criteria. The parameters of each of the 13 criteria rating were defined by a four point scale with a low of "no evidence" to a high of "solid, high quality evidence."

The report summarizes the ratings for each of the 14 curricula across the 13 evaluation criteria. The criteria for reviewing and rating the curricula that support classroom-based instruction for Head Start preschool programs include:
1. Curriculum is grounded in Child Development Principles
2. Curriculum is Evidence-Based
3. Curriculum shows Effects on child outcomes
4. Comprehensive across Learning Domains
5. Depth for each covered learning Domain
6. Specific learning goals
7. Well-designed learning activities
8. Responsive Teaching
9. Supports Individualized Instruction
10. Culturally and linguistically responsive
11. Ongoing assessments
12. Professional Development opportunities
13. Family Involvement Materials

The curriculum packages rated in the Preschool Consumer Report include:
- Core Knowledge Preschool Sequence
- Creative Curriculum
- Curiosity Corner
- DLM Early Childhood Express
- Hawaii Early Learning Profile (HELP)

- HighReach Learning
- HighScope
- Innovations: the Comprehensive Preschool Curriculum
- The InvestiGator Club
- Let's Begin with the Letter People
- Opening the World of Learning (OWL)
- PreschoolFirst
- Scholastic Big Day for PreK
- Tools of the Mind

Additionally, the report has an individual summary of the key elements of each curriculum package. This summary for each package describes the curriculum, the target population, the HSCDELF domains addressed, cost per classroom, instructional approach, training, and the specific materials reviewed by raters.

TechMIS subscribers who are considering approaching districts which are planning to select the Early Childhood model for their SIG intervention should review this report. It identifies those features of some competitors' curricula which are evidence-based and show effects on child outcomes and offer materials for parent/family engagement.

TechMIS clients could also benefit from reviewing the selection criteria and rating process as they position their early learning products to meet the increasing emphasis on classroom-based instruction for preschool, Head Start, and other preschool programs.

It is surprising that the high emphasis that Office of Head Start (OHS) places on school readiness goals that use the HSCDELF domains, does not address the growth in state early learning standards as there is no mention of this in the 80+ page document.

(See TechMIS Special Report on the new definition of "scientifically-based research" [SBR])

The report is available at:
http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/teaching/practice/curricula/research.html

USED Announces Winners of Teacher Prep Grants Which This Year Focused on its High Priorities of STEM and Common Standards, With 15 of the 24 Grantees Having Been Funded in the 2009-10 Competitions

For the last several years, the Teacher Prep National Competitive Program has placed priorities on the ConnectEDucators program (use of technology and digital learning materials), the RESPECT proposal (teacher leadership and improved work environments), Teach to Lead, and now STEM and Common Core Standards. The 15 grantees funded this year were also funded in 2009 and 2010; according to Education Week's *Teacher Beat* blog (September 25th), "The category of re-ups includes the Boston Teacher Residency, several California State campuses, Teachers College at Columbia University and Arizona State University, among others," which suggests that while the priorities funded each year change to reflect the Administration's most current priorities, the awarded grantees have not.

According to USED officials during a press call, most of the awardees address both of the new priorities (STEM and standards), but according to the blog, some only "scaled-up" their previous grant efforts. More than 80 applications were submitted under this supposedly competitive grant program. As the blog notes, "Still it remains unclear how successful the former grants have been." Results over five years have not been posted on USED's website, and the Mathematica Research evaluation of the 2009 grantees has not been completed.

If one wishes to partner with grantees under this "competitive" grant program, the likelihood is high that incumbents or "re-ups" are the best ones to "bet on" receiving future grants under this program.

As one reads the USED press release (September 25th), the total thrust of the new awards will be STEM and STEM-related teacher prep, and this represents a significant step in reaching the President's State of the Union Address 2011 goal of preparing 100,000 STEM teachers over the next decade with strong teaching skills and deep content knowledge. The press release notes that the President's 2015 budget request would invest $2.9 billion in Federal STEM programs among numerous departments of which many observers consider this USED one a very small step forward. However, the President's Science Advisor John Holdren stated, "The awards announced by Secretary Duncan today mark a major step forward toward meeting the President's goal of preparing 100,000 excellent STEM teachers and will help ensure that these dedicated professionals have the tools, training, and resources they need to continue inspiring our kids to excel in science and in math."

The $35 million award to the 24 colleges and their partners (see USED press release September 25th) is an example of how USED attempts to find funding from a variety of larger program budgets, for which

there is great funding flexibility, to include the Administration's priorities, in this case STEM. It is also an example of how this Administration continues to fund non-profit groups, colleges and universities and other favorites in this program and others such as a School Improvement Grant initiative.

USED Has Awarded $20 Million for 12 New Awards Under the Turnaround School Leaders Program to Support Projects to Develop, Enhance, and Implement a Leadership Pipeline that Select, Prepare, Place, Support, and Retain School Leaders

It includes leadership teams for SIG schools. The competition, funded out of the $500 million SIG allocation, was first announced "without much fanfare back in March," as noted in Education Week's *Politics K-12* blog (October 1st). The lack of turnaround leaders, especially principals, has been one of the biggest concerns, according to the blog, which has resulted in only about two-thirds of SIG schools making progress or holding their own, with a third regressing over the first three years of the projects.

Funds can be used to provide high-quality training and other support that focuses on instructional leadership and management training/support to individualize student instruction and to retain effective school leaders to implement rigorous intervention models (e.g., the initial four prescribed models and recently the three new intervention models -- whole school reform, SEA homegrown and early childhood, pre-K early learning).   See our last TechMIS Special Report. The USED press release (October 1st) identifies the 12 grantees and the amount each will receive over a three-

year period.   Local education agencies, which are recipients, include Patterson, Syracuse, Dade County, and Cleveland, with Dade County receiving the largest grant of $2.1 million; the university recipients include University of Illinois, North Carolina State, Rocky Mountain College, and Western Michigan University; and non-profit groups include New Leaders, Incorporated. It is surprising to note that the list does not include Mass Insight, referred to by Secretary Duncan more than four years ago as the leading group who "wrote the bible" on turning around lowest-performing schools. Mass Insight has partnered with a number of districts, provided numerous guidance documents, and recently published a report, "Ounce of Prevention," with suggestions/recommendations for districts implementing the Administration's high-priority preschool early education intervention model under the new proposed SIG guidance. Nor does the list of awardees include the University of Virginia, which has been another very active partner in working with districts and states attempting to turn around lowest-performing SIG schools.

The USED-sponsored report "Ounce of Prevention" suggests that the Federal government "should be more active in creating guidelines, policies and goals for states and school districts to meet, particularly in the early years and the early grades of elementary school," according to the New America *EdCentral* blog. Specifically, the blog also notes that the "report makes valuable suggestions toward a more comprehensive picture of accountability…Rather than simply using standardized test scores, states could include school climate measures and child outcomes like absenteeism rates, as well as

kindergarten readiness assessments, to create a longer-term, inclusive improvement strategy."

In its "bible" recommendations of more than four years ago, Mass Insight argued the need to show quick improvement in use of one or more components of the four intervention models which could have been possible in the three-year grant period initially mostly high school SIG programs. As the Mass Insight report notes, in light of the long-term effects, the length of time the effects of implementing the pre-K early challenge early education intervention requires increases in the length of time to five years. On the other hand, one can question whether the SIG program is an appropriate program under which to place another one of the Obama/Duncan priorities in order to receive funding in light of an almost stalemate over funding with Congress over funding the President's larger early childhood preschool initiative.

USED Approves Waiver Extensions for Six More States, Raising the Total Number Thus Far to 29

Approvals of extensions for Arizona, Massachusetts, Missouri, Oregon, Rhode Island, and Utah for one year have numerous conditions which have to be met before final approvals a year from now. Of the total 35 states whose waivers have "run out," requests from Louisiana, New Jersey, and New Mexico are still pending, according to Education Week's *Politics K-12* blog (October 9th). Some of the conditions and caveats for the six states as reported by *Politics K-12* are noted below.

Massachusetts requested flexibility to allow

districts to choose between the Partnership for Assessment of Readiness for College and Careers (PARCC), or the current Massachusetts Comprehensive Assessment System (MCAS). While USED initially said "no," it finally agreed to give Massachusetts a year before the state has to require all districts to take the same test, which according to the blog, "The state may have some flexibility to offer districts a choice this school year." Arizona's argument with USED centered on the request to allow Arizona to count graduation rates at a 15 percent "weight" as part of the accountability system. USED wanted 20 percent; however, it finally agreed to the state's requested 15 percent for the extension. After significant negotiations and state hearings which involved officials from other states regarding the issue of "Federal control" over education through the use of the waivers, Utah finally filed for an extension, which was approved.

Missouri's extension approval will allow the state to use the Smarter Balanced test in grades five and eight as well as scaled-down versions for grades three, four, six, and seven. A lawsuit filed by the state argued the Federal funding of Smarter Balance "cedes the state's sovereignty over its K-12 policy to the consortia…[which] was never authorized by Congress and is in violation of the U.S. constitution," according to Education Week's *State Ed Watch* blog (September 22nd). The Missouri extension allows the state to continue working on its testing plan. Oregon, as most other states requesting one-year extensions, agreed to continue modifying its teacher evaluation system in order to receive a final waiver approval a year from now. Education Week maintains an updated list of states which have received waiver extensions, as well as

final approvals on their website.

"Takeaways" from Recent Education Networking (EdNET) Conference

A number of takeaways from the September 28-30, 2014, EdNET conference in Baltimore, from my limited personal attendance and several media items covering the conference are worth mentioning.

Robert Lytle, partner/co-leader of Education Practice at the Parthenon Group, painted a somewhat gloomy, but realistic picture of the K-12 marketplace before several hundred K-12 firms' (mostly startups) attendees and consultants. On one hand, local and some state revenues have led to increased district budgets, which however, are being "eaten up" by rising costs in non-instruction areas. According to Education Week's *Marketplace K-12* blog (September 30th), he predicted, "The funding you saw in the 90s and the early 2000s is not going to return…everything you sell to a school district is something that someone else did not sell. It's a share stealing market." According to the blog, the Parthenon Group calculates that the instructional content market amounts to $8 billion a year, with about 35 percent being spent on remediation and another 35 percent used for supplemental classroom materials. He argued that most of the firms selling digital products "don't articulate what your product does very well" and urged businesses to be clear about what their products do, how they do it, and what results educators can expect from using those products." The key to successful selling, he argued, is communicating how products raise student performance and reduce achievement gaps.

PILOTed (October 6th) highlighted other comments by Lytle: "…the switch to digital content is on. And who are the biggest adopters of digital technology in schools? Mid-career teachers. On the other hand, fewer than ½ of 1% of classrooms actually use district-purchased digital content."

Also, as PILOTed reported on Lytle's comments, "And the last insight, it is not reasonable to expect that automated assessment can directly prescribe learning resources to students that will strengthen student achievement anytime in the near future. No matter how much we want to automate processes, teachers are and will be the best evaluators of student needs for the foreseeable future."

Based on the *Marketplace K-12* report, the 35 percent spent on remediation and 35 percent spent on supplemental classroom materials appear to be relatively high and in conflict with recently reported sales figures from the Association of American Publishers (see September TechMIS Washington Update). The AAP numbers for the last 12 months report significant increases in sales to adoption states which generally purchase core programs rather than remediation and supplemental materials. On the other hand, as we have noted in previous TechMIS reports, even though the five percent sequester cuts were in effect in Federal programs during the last school year, it would appear that approximately $2 billion of Title I carryover funds from previous years more than made up for the sequester in Title I cuts, as these freed-up "carried over funds" were spent beginning in January-February through September 30th when the two-year moratorium on sequesters passed Congress. This most likely explains a higher than

normally expected amount of purchases in Q1 and Q2 under the Title I program for remedial and supplemental materials, as these funds had to be expended by September 30th.

In discussions with officials from several firms selling digital devices, tablets, and related products to K-12, they expressed great pleasure in 20-30 increase in sales which, they have experienced thus far and attributed such increases over the previous year's sequester and district postponements of purchases of upgrades and new devices because of sequesters. None of these officials were aware of new changes in Federal procurement imposed by the Office of Management and Budget, which now separates many devices (costing less than $500 per unit) from computers. Under such changes, districts which use Federal funds, particularly Title I, are no longer required to carry insurance, and track "property" movement of such digital devices to other schools (e.g., non-public schools); and nor do they have to follow the long tradition of auction or related procedures for selling or doing away with such "computer property." Not only has this reduced district costs of purchasing and using digital devices, but also has removed many headaches from district Federal program administrators.

In a more sobering moment, the individual who basically created EdNET, Nelson Heller, announced his retirement. Heller and his faithful Anne Wujcik have been in the education consulting and conference business for more than four decades. Some of the earliest and most lively debates on the pluses and minuses of microcomputers in education and their use were held during the 1980s and 90s, under the TALMIS brand name which subsequently joined Market

Data Retrieval, of which Heller Reports was a flagship product. Heller told me of his new venture in working with groups developing real world simulations of climate change to which I remarked, "Good luck Nelson in your new venture."

Ranking House Education Committee Democrat, Representative George Miller, Has Called for a "Smart Pause" in Tying Student Scores on Common Core State Standards (CCSS) Assessments to Teacher Evaluations -- Which Takes Much of the "Wind Out of the Sails" of Secretary Duncan's "Teacher Evaluation" Priority

Even though USED has offered "blanket" one-year extension waivers for states who request them, the retiring Congressman Miller, a major proponent for NCLB accountability, feels that teachers need more time to prepare for selecting and implementing curriculum for exams, some of which were only field-tested this year; and considering that nationwide implementation of CCSS assessments appears to having a "bumpy road" ahead. His position reflects a similar position to the one taken by Randi Weingarten, President American Federation of Teachers, who a year ago called for a "high-stakes testing moratorium." According to Education Week's *Politics K-12* blog, which broke the story on September 26th, Miller argued, "Tying test scores to Common Core exams before teachers are ready could be repeating one of the biggest mistakes of the NCLB era."

The teacher and principal evaluation requirement has been the major sticking

points in many states getting waivers approved for two or more years and/or getting one-year extensions if the state continues to progress in this area. In fact, USED's policy position in this area has changed significantly over the last year-and-a-half from "taking a hard-line position" in approving some state's waivers last year; then extending deadlines for others; and most recently providing blanket waivers for any state that wishes to continue their waivers until next year when final decisions are scheduled to be made by USED.

In the meantime, over the last year, a number of states have replaced the planned exams developed by the Smarter Balanced and PARCC Common Core assessment consortium, which results in lack of uniform implementation across states. When the NCLB/ESEA waiver flexibility was announced, former Secretary of Education Margaret Spellings predicted that the waiver process would be a casualty of its own weight, resulting in different accountability systems in many states.

According to the Education Week article, Miller does not think ESEA reauthorization will occur any time soon, and that "Congress needs to take a deep breath and take some time to think about the transition [to Common Core] and what the Federal role should be."