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Author: Jonathan Schnur at WDCB01

Date: 11/7/96 8:15 PM

Priority: Normal

TO: Mike Smith at WDCT01

TO: William Kincaid at WDCT01

TO: Terry Peterson

Subject: Urban schools conversation with Mike Cohen

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After the WH event yesterday, I wound up talking with Mike Cohen at the Old Ebbitt Grill about the urban schools initiative. I summarize his comments below, and I think he will call Mike S. to discuss further in the next day or so.

First, he said it was not clear how the budget process would unfold. While OMB is proceeding with their hearings and reviews, there has apparently been a very high-level decision at the White House to initiate a top-down budget process to reflect the President's priorities. He said he wasn't at all sure how this process would connect to the OMB process.

Second, he felt torn about the urban initiative in several ways. He raised the following issues, though he did not express strong feelings about how they should or could be addressed. He hopes to be able to work through these issues with us and present more of a united front to OMB and others. His 3 issues:

- 1) He continues to think a focus on urban schools is important, and generally likes the major themes discussed in the paper we sent to OMB.
- 2) He wonders how difficult it might be to get an initiative that is solely focused on urban schools through the Congress. He noted that other initiatives that benefit urban areas -- with the partial exception of the EZ/ECs -- have been passed as part of a broader effort. While he raised this concern, it was not clear how he would address it. He did raise the possibility of having a special concentration on urban areas as part of a broader efforts, but even as he said it, he did appear convinced this was the right solution.

(Bill K and I discussed this today, and both see several problems with a broader approach. Not only does the \$ get diluted, but it would be harder to keep in some of the "tougher" provisions, and begins to become hard to justify why we need still another general local reform initiative. Not sure what the answer is to Mike's concern, though.)

- 3) Mike is concerned about the relationship of this initiative to other federal \$ going into districts receiving grants. On one side, he worries about what happens if districts do very badly in the audits/reviews, and do not take the needed steps to make change. He understands funding under the urban initiative might not keep flowing to low-performing districts, but he worries about the substantive and political consequences of continuing to send OTHER federal funding to districts that can't get their act together.

(When Bill and I talked about this particular issue today, we thought this could be addressed by stating that information from audits/reviews could be used by other federal programs, and that the Department could act under existing authority to take action in these

programs where needed. Some further discussion on this point is needed. It raises a general policy question about how aggressive the Department should be in intervening in districts not using federal funds appropriately or well.

(Moreover, Bill and I thought more discussion is needed on the possible the effect of using audit/review findings to inform monitoring and intervention in other federal programs? This might be a disincentive for districts to participate; on the other hand, it might produce some interesting -- and possibly healthy -- dynamics in cities where local reform groups were interested in the \$, but districts chose not to apply for them because of concerns about the audits.)

At the same time, Mike noted the tension between all of our new categorical initiatives and the emphasis on flexibility in the use of \$ to support local and state reform efforts. In this context, he asked how this initiative could better connect to the coordinated and flexible use of other federal funds. He didn't say it, but he seemed to imply that it might be worth thinking about providing additional flexibility to districts making good progress under the urban initiative. (I think Bill K has some concerns about this, based on his experience with waivers, ed-flex.)

That was all he said, and he planned to call Mike S. later this week.

-- Jon

October 23, 1996

MEMORANDUM FOR MIKE SMITH

FROM: MIKE COHEN

SUBJECT: URBAN INITIATIVE

I have read an October 20 draft of the proposed Urban Initiative, and thought it would be helpful, while it is still being shaped, to provide some response and suggestions.

In the main, I think it is very important that the Administration advance an urban initiative, and the principles of excellence, accountability and choice are the right foundation for this. (Ironically, these are the same themes George Bush promoted in his 1988 campaign.) The draft I have seen provides a good foundation for such an initiative. Most of my comments below push the proposal further in the direction in which it is already headed, rather than take it in new directions.

- **Budget:** The document describes this as a 10-year, \$500-million initiative. Does this mean a \$50-million a year initiative, or a \$500 million per year initiative? The difference is substantial, both for the federal budget and for the districts.

- **Performance Audits:** I think the requirement for a Management Performance Audit is excellent. It speaks directly to real problems in city school systems, and certainly to public perceptions. However, it also poses a serious issue that is hinted at but not directly addressed in the paper: if one advantage of the audit is to help the district take maximum benefit of new federal resources (school construction, America Reads, etc.), then there ought to be a point at which the federal government becomes unwilling to invest new resources (or perhaps even additional resources from existing programs) if the audit points up significant management problems which seriously interfere with the district's ability to use external resources, and if these deficiencies remain uncorrected after a reasonable period of time.

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If this approach were incorporated into the initiative, it might well discourage some cities from participating in the program (especially if it were funded at the lower rather than higher level.) On the other hand, those districts that did participate would have a very real incentive to address management deficiencies and, once they did, would presumably make more efficient use of all of their resources.

I'm less clear of the value of the proposed Instructional Performance Audit. More specifically, I suspect many of the eligible districts already have either an NSF Urban Systemic Reform initiative, a Goals 2000 initiative, a foundation-sponsored systemic reform effort, or one they did entirely on their own. Tom Payzant used to point out frequently the challenge to urban districts of integrating their several systemic reform efforts. It seems to me that the proposed instructional audit might well lead to yet another reform initiative, or might be like closing the barn door after the horse gets out -- it should have preceded the systemic initiatives already in place in the districts.

As an alternative, there might be a more focused component that required the district to demonstrate that it had adopted challenging academic standards, had assessments appropriately aligned with them, and had annual, measurable performance targets for increases in student performance against the standards. There might be a number of ways a district could demonstrate this -- by benchmarking its math standards against the highest performing countries as reported by TIMSS, by using the NAEP reading assessment for 4th grade reading, as we are proposing in America Reads, or by showing that it is using state academic standards and measures that are themselves benchmarked to some external standard.

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While no approach here would be without significant drawbacks, the main thrust would be for each participating city to show (to its public and to the federal government) that, in one fashion or another, it is using the most challenging standards available without delay. At the same time, it will be important for the Department to be able to say clearly and demonstrate that, from the outset, the urban initiative is clearly focused on helping kids reach challenging standards, rather than being focused on helping districts first develop challenging standards.

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• **Accountability:** I would strengthen the accountability provisions in several ways. First, in addition to the school-based rewards for performance, I would provide a financial incentive for the district (perhaps as a percentage of its Title 1 funds) for making annual gains in academic performance, with the same attention to subgroup performance discussed in the draft. This would create incentives for the school board, the superintendent and the central office to support school-based efforts.

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Second, I think there needs to be a more clear-cut requirement for effective intervention in failing schools. As I read the draft, this does little more than the current Title 1 provisions. I fear that this would enable the districts to first begin the process of identifying low performing schools and designing the intervention process at the beginning of their funding period. This will not lead to swift action. Instead, I would urge something with more teeth, and within a specified timeline. For example, districts might be required to close down and then reopen schools that have been consistently low performing for five years, without measurable progress, within two years of participating in this program. They could go back five years from the date of the application to identify the target schools, and then still have two years to get the school turned around before a more serious intervention is called for. And I continue to think that we ought to be promoting the idea that failing schools should be closed down, reopened as charter schools with new, energized teachers, and that the kids also ought to be given after-school help so they can catch up academically.

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• **Outstanding Teachers and School Leaders:** This is good, especially the emphasis on creating career ladders for paraprofessionals, and the establishment of local consortia for training and professional development. In addition, we should consider creating some kind of national Urban School Leaders Academy, which, working together with the local consortia, could help develop curriculum and training approaches, help local districts collaborate to solve common problems and develop shared tools for training and professional development, and perhaps organize summer institutes or other cross-district professional development opportunities which could support and strengthen the work of local consortia, and help teachers and principals learn from colleagues in other urban districts.

• **Choice:** I like the array of options here; I don't think we should push districts for a one-size-fits all strategy, even while we promote expanded use of choice overall, and give every parent the right to some choice. That said, I think there is an important opportunity here, at least in the rhetoric we use to describe this initiative, to make some important links between choice and accountability. I haven't yet figured out how to build this into the initiative, but let me lay out my thoughts.

This initiative will push urban school districts to operate systems with two primary forms of accountability -- accountability to the public for results, and accountability to each parent for making the school "work" for his or her child (with the meaning of "work" varying considerably among parents). These are both important forms of accountability, and we should emphasize them both as underpinnings of our approach to urban school reform.

One other thought: As I read your proposal, first the district goes through one or more audits, and only then begins to work on expanding choice. I think instead we should be pushing districts to do both simultaneously. If expanded choice is a good idea, there is no need to delay until the audit is done.

• **Missing Pieces:** I think this initiative would be stronger if it had some of the following:

- **A more clear emphasis on flexibility.** Every district participating in this initiative will have a district-wide improvement strategy. We ought to make it as easy as possible for those districts to use all federal education funds to support the implementation of that strategy. This could involve a range of options, such as a speedy waiver process, some form of Ed-Flex for local districts, or even the ability to commingle education funds as long as the district shows gains on agreed-upon performance indicators. My could use
- **A greater after-school/community school emphasis.** As the draft indicates, part of the challenge urban schools face arise out of problems of child poverty, drugs, safety and other community-based problems. Even a focused effort to improve teaching and learning in urban schools won't be sufficient. It would make sense to broaden this initiative to encourage urban districts to keep schools open longer, provide the student, youth and family services each community thinks appropriate, and tap into federal funds from a number of federal agencies (e.g., HHS, Justice) that can support community schools.
- **A greater focus on drop-out prevention and increasing high school graduation.** The proposal doesn't pay much attention to increasing high school graduation rates and lowering dropout rates. Yet this is a significant problem in urban areas. Further, it seems to me that making choice one of the centerpieces of this initiative provides an important opportunity to address this issue. A system of public school choice and charter or alternative schools would lend itself to establishing schools that specialize in keeping potential dropouts or recapturing those who already dropped out, and helping them meet academic standards and graduate.