

NoChild
LeftBehind



**Evaluation of Flexibility Under *No Child Left Behind*:
Volume IV—The Local Flex Demonstration
Program in Seattle Public Schools**



**Evaluation of *No Child Left Behind* Flexibility Provisions:
Volume IV—The Local Flex Demonstration Program in
Seattle Public Schools**

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Executive Summary

Flexibility and accountability are two levers for change that occupy an increasingly prominent place among federal strategies for educational improvement. In return for introducing higher academic standards and performance-based accountability systems, states and districts have been granted increasing flexibility over how they may use the funding they receive from federal sources. The basic premise underlying this exchange of flexibility for accountability is that local educators and administrators are in the best position to identify student needs and that these needs can best be met if local actors are given greater flexibility over the use of federal resources, while meeting high standards for academic performance. Although flexibility has been an important element of educational policy for at least the past decade, the 2001 reauthorization of the *Elementary and Secondary Education Act (ESEA)*, also known as the *No Child Left Behind Act of 2001 (NCLB)*, marks an important milestone in the evolution of this improvement strategy.

All states and districts may now avail themselves of a variety of mechanisms for exercising flexibility over the use of certain federal dollars. Flexibility options that are either new under *NCLB* or extended from previous authorizations of *ESEA* include: State Flex, Local Flex, Transferability, Title I Schoolwide Programs, Waivers, Ed Flex, Consolidated Applications, Consolidation of Administrative Funds, and an initiative designed for rural school districts. In many ways, the most ambitious example of the way in which flexibility and accountability are brought together can be found in the State Flex and Local Flex demonstration programs included in *NCLB*. These competitive programs grant a selected group of participating states and districts enhanced flexibility authority to consolidate a potentially large pool of funds from a set of eligible federal programs. These consolidated funds may be employed for a variety of different educational objectives consistent with the broadly defined purposes of *ESEA* in order to help these participants meet specified goals under the state's definition for adequate yearly progress (AYP). Both State Flex and Local Flex require the identification of educational priorities and the development of strategies to address these needs in a formal five-year educational improvement plan. Districts that fail to make AYP in two consecutive years become ineligible for Local Flex.

The number of agencies entering into the initial round of State Flex and Local Flex competitions was quite small. Though the statute authorized up to seven states to receive State Flex authority, only Florida initially applied for and was approved to participate in State Flex but has since withdrawn from the demonstration program. Similarly, up to 80 local education agencies could qualify for Local Flex authority, but only the Seattle Public Schools submitted a full application for the Local Flex competition. In order to inform and assist other districts that might consider participating in the Local Flex program, the U.S. Department of Education commissioned this case study of the Seattle experience to examine benefits, challenges, and implementation strategies.

This report is based on interviews conducted with various stakeholders involved in Seattle Public Schools' implementation of Local Flex, including representatives from the Seattle Public Schools and the Washington State Office of Superintendent of Public Instruction. In addition, administrators from both public and private schools in the Seattle Public School District were interviewed. The interviews were conducted on Nov. 30 and Dec. 1, 2005.

The study examines the following research questions:

- Did Local Flex allow the district to better target federal funds to meet students' needs?
- Did Local Flex facilitate initiatives or programs that the district has specified in its five-year plan?
- Since implementing Local Flex, what changes have occurred in district accounting, management roles and responsibilities, and the district's relationships with private and public schools?
- How has the district balanced the needs and requirements of flexibility while ensuring that the intent of federal programs included in the agreement is met?

Key Findings

While the Seattle Public School District is still in the process of fully implementing Local Flex, the initiative has already changed the way the district focused on strategic planning, helped to deploy resources to the schools and students most in need through expanded programs, and ushered in greater collaboration in the district office and with private schools.

By focusing on five major themes through Local Flex, Seattle Public Schools better targeted federal funds to meet students' needs.

Local Flex created new possibilities for effectively reaching the district's goals and allowing Seattle Public Schools to think strategically about student needs through the lens of its preexisting five-year plan. As part of the agreement, Seattle Public Schools committed to using consolidated funds to address five specific areas for improvement:

- Teacher knowledge, rigor and skill in the application of research-based practices and strategies for mathematics, literacy content and pedagogy.
- Teacher knowledge and skill in standards-based, culturally responsive teaching and learning, differentiation of instruction, and the use of data to inform instruction.
- Beginning teacher quality and preparation for service to underserved students of diverse backgrounds.
- Integration of technology in the classroom for teacher productivity and teaching and learning programs.
- Intervention and support services for academic achievement, reentry and substance abuse issues for targeted student populations.

Local Flex facilitated these efforts by allowing Seattle Public Schools to reallocate funds and rapidly respond to changing district needs while continuing to provide funds to issues related to each of the eligible programs. *Seattle Public Schools used Local Flex to meet students' needs through planning and accountability measures, tracking progress, and employing new initiatives.*

- District representatives noted that Local Flex gave Seattle Public Schools the opportunity to think about federal dollars differently, which aided planning for both the district's long-term and short-term goals. New accountability measures, along with required tracking of progress in the Local Flex agreements, meant that the district could carefully target students and provide them with additional services.
- Local Flex encouraged collaboration across federal program areas and departments, and allowed the district to address student needs despite changes in the state's accountability system by enlisting teacher coaching and mentoring.
- Consolidated funding and identification of need by planning through Local Flex provided for targeted programs: The district focused Local Flex funds on new school-based literacy and mathematics coaches and expanding roles for teacher mentors.

While Local Flex ushered in improved collaboration within the district office and reduced administrative burdens, district representatives recognized that the district had not yet been able to take full advantage of the potential benefits the program offered.

- Seattle Public Schools was the first district in the country to implement Local Flex, providing an important example of this demonstration program. The district has also undergone substantial staff changes and had only fully implemented the program for a year and a half at the time of the case study. This meant that the implementation of Local Flex was still a work in progress. District representatives indicated that they would be able to take advantage more fully of the new opportunities the program offered in the coming year by extending current programs made possible by Local Flex.
- District representatives indicated that Local Flex, combined with a tight district budget, led to greater coordination among those responsible for federal funds and various departments. Representatives noted that it was difficult for the district to overcome the tradition of categorical programs but suggested that more coordination would be in place in the coming year. In addition, the district had not yet taken full advantage of the opportunity presented by Local Flex to integrate and streamline staffing responsibilities.
- Some district officials reported that the consolidation of funds through Local Flex decreased administrative time and costs and allowed the district to focus on providing services. Overall, the district had a higher degree of freedom both in terms of planning and budgeting than it had prior to the implementation of Local Flex.
- While Local Flex provided Seattle Public Schools with more flexibility than other flexibility options such as Transferability, some respondents felt that Local Flex left most

federal dollars locked into more restrictive programs and did not allow more meaningful flexibility because it did not allow for consolidation of Title I funds.

Seattle Public Schools' relationship with the state had remained similar while the district's interaction with public and private schools improved since implementing the program.

- In general, the state maintained a strong relationship with Seattle Public Schools and the district's competent grants management team that required little technical assistance from the state.
- Representatives from public schools indicated that they found Local Flex made a positive difference in the relationship between schools and the district by increasing the level of communication and improving services to students in need. Because Local Flex funding and programs were targeted to the most at-risk schools, schools identified as making adequate yearly progress experienced fewer of the benefits of Local Flex.
- Because Local Flex agreements also benefit private school students and teachers by allowing the LEA to use the funds for any purpose under *NCLB* for benefits and services for private school students and teachers, private school representatives commented extensively on the improved communication with the district and other benefits associated with the district's use of Local Flex including:
 - Increased ability to target funds to directly meet specific needs
 - Expedited distribution of funds for services and limited bureaucratic delays
 - Improved communication through simplified reporting procedures and a primary contact at the district office

Respondents indicated that the district had been able to balance flexibility with the intent of federal programs.

- The district took steps to guarantee that the intent of the federal programs continued to be met after the implementation of Local Flex. The funds made available for consolidation through Local Flex remained earmarked for particular programs although the district still retained the right to use them for other purposes.
- While Local Flex required that the goals associated with the four programs still be met, there was potential for Seattle to use Local Flex money to fund other educational strategies beyond "Title boundaries" by pooling eligible funds, increasing collaboration, or creating new programs rather than simply extending current ones. Seattle Public Schools did not cross these boundaries and in turn, implementation of Local Flex never threatened the intent of the eligible programs.

1. Introduction

The State Flex and Local Flex Demonstrations¹

Perhaps the most ambitious example of the way in which flexibility and accountability have been brought together can be found in the State Flex and Local Flex demonstration programs. Although no additional resources are provided to participating states and districts, the enhanced flexibility granted under State Flex and Local Flex allows participating agencies to consolidate a potentially large body of existing federal funds and to use those funds for any educational purpose authorized by the *ESEA*. In particular, these consolidated funds are intended to support activities that help districts and schools to make adequate yearly progress (AYP). Participants in the State Flex and Local Flex programs are afforded the opportunity to exercise even more extensive flexibility than offered in other *NCLB* flexibility programs over a set of funding categories similar to those eligible under Transferability. This report focuses specifically on Local Flex—100 percent of formula funds from the following four federal programs may be consolidated: Title II, Part A (Improving Teacher Quality State Grants); Title II, Part D (Educational Technology State Grants); Title IV, Part A (Safe and Drug-Free Schools and Communities); and Title V, Part A (State Grants for Innovative Programs).

Several distinct forms of flexibility authority are incorporated into these demonstration programs as levers to address local educational needs. The State Flexibility Authority (Sections 6141 through 6144 of *NCLB*) offers flexibility authority to state education agencies with each agency able to enter into Local Flex agreements with and between districts. However, no states are currently utilizing State Flex. The Local Flexibility Demonstration Program (Sections 6151 through 6156 of *NCLB*) authorizes the secretary of education to enter into flexibility demonstration agreements with up to 80 districts in states that are not exercising State Flex. Local Flex permits participating districts to consolidate funds from four eligible federal programs and use those funds for any educational purpose authorized under *ESEA*. The flexibility associated with Local Flex applies to both public and nonpublic schools in participating districts.

The degree to which State and Local Flex link flexibility and accountability as elements of an integrated strategy for promoting educational improvement distinguish them from some of the more widely accessible forms of flexibility available under *NCLB*. State and Local Flex applicants are required to develop a clear, detailed five-year plan of action that articulates their rationale for seeking enhanced flexibility authority, delineates a concrete strategy for the consolidation and utilization of affected federal resources, and presents a convincing case that these actions will serve to facilitate the attainment of educational goals. Districts must develop a clear linkage between exercising flexibility authority and carefully defined local and state educational priorities. Districts must submit an annual performance report for each year of the Local Flex implementation. In addition, if the district fails to make AYP for two consecutive years, the Department must terminate the Local Flex agreement.

¹ This section and the following one of this report are based heavily on U.S. Department of Education, Office of the Under Secretary, *Factors Affecting Initial Application Rates for the State Flex and Local Flex, Programs*, Washington, D.C., 2003.

Challenges to Participation

The first round of State Flex and Local Flex competitions, conducted in late 2002 and early 2003, resulted in one State Flex application and only one complete Local Flex application. As a result of the small number of applications, the U.S. Department of Education commissioned the Urban Institute in 2003 to conduct a series of interviews examining the low application rate for these demonstration programs. That study identified a number of factors that led to the relatively low participation rates in State and Local Flex competitions. These factors included:

- **Competing Priorities and Organizational Capacity.** State and district education agencies viewed the implementation of other *No Child Left Behind* provisions, particularly those related to accountability, as a higher priority than exploring the possibilities of the State and Local Flex programs. As the application deadlines for these provisions preceded key *NCLB* deadlines, state and district education administrators felt unable to formulate the kinds of long-term improvement strategies the applications required. Thinly stretched organizational resources and agency staff also made agencies less likely to pursue discretionary opportunities, unless they were thought to be particularly attractive. The combination of limited organizational capacity and higher priorities effectively limited interest in the State and Local Flex programs.
- **Information about the State and Local Flex Programs.** Administrators at the state and district level often displayed only a modest familiarity with the program provisions. While all administrators were familiar with *NCLB*-related flexibility in general, few had detailed knowledge of the nuances of the State or Local Flex provisions or what distinguished them from the Transferability authority. This knowledge gap is partially attributable to the distance between information sources and the administrators charged with examining and applying for the programs; state-level administrators were more familiar with State Flex than their district-level counterparts were with Local Flex. Unable to distinguish State or Local Flex provisions from other flexibility options, many officials chose not to pursue the program.
- **Benefits and Costs of State and Local Flex.** State and district administrators generally agreed that greater flexibility in the administration of federal funds would be beneficial. Few respondents, however, could provide specific examples of specific ways in which the demonstration programs could uniquely help them to achieve their educational goals. In short, many administrators saw no clear benefits in implementing State or Local Flex. As the implementation of the provisions would involve additional costs and responsibilities (e.g., a time-intensive application process, new accounting procedures, and new expenses associated with administering the program), a rough cost-benefit analysis led some administrators to decide that participating in the demonstrations was not worthwhile, especially because these programs provided no additional funds.

Two of these factors (competing priorities and limited information about the programs) can be seen as largely external to the State and Local Flex provisions themselves. It is plausible that, given more time and more detailed information about the programs, state and district agencies would choose to pursue State and Local Flex.

There are no specific application deadlines for Local Flex and State Flex; the Department of Education accepts applications for the two demonstration programs on a rolling basis. Currently, the number of participating states and districts remains small. The only state that submitted a State Flex application, Florida, withdrew from the program before the state or its districts began to implement State Flex activities. Seattle Public Schools is the only district participating in Local Flex.

The low levels of participation in these federally sponsored demonstration programs raise questions about the potential benefits and challenges for districts or states participating in these programs.

The U.S. Department of Education commissioned the Urban Institute to conduct a series of interviews with district officials from Seattle Public Schools, the sole district exercising Local Flex. The purpose of these interviews was to investigate Seattle's experiences with Local Flex in order to provide information to other districts considering the option of Local Flex and also to examine the benefits and challenges of the program. Representatives from the state as well as from public and private schools in the district were interviewed. Four central questions guide this study of Seattle Public Schools' use of Local Flex:

- *Did Local Flex allow the district to better target federal funds to meet students' needs?*
- *Did Local Flex facilitate initiatives or programs that the district has specified in its five-year plan²?*
- *Since implementing Local Flex, what changes have occurred in district accounting, management roles and responsibilities, and the district's relationships with private and public schools?*
- *How did the district balance the needs and requirements of flexibility while ensuring that the intent of federal programs included in the agreement is met?*

² Seattle Public Schools five-year plan is a district initiated long-term strategy document formulated as part of the district's application for Local Flex. It is updated each year by the district and available at <http://www.seattleschools.org/area/fiveyearplan/Fiveyearplan-mastercopy.pdf>. The most recent five-year plan addresses "academic achievement and the 'gap,' barriers to learning, leadership, and resource management issues."

2. Methodological Design

The aim of the interviews conducted for this study was to obtain information regarding Seattle's experience implementing the Local Flex demonstration program from a small set of respondents from the state Office of the Superintendent of Public Instruction, private and public schools, and Seattle Public Schools district. We identified 16 key respondents about the Seattle experience drawn from categories that capture the diverse experiences and viewpoints of different stakeholders and agencies impacted by Seattle's implementation of Local Flex. Interviews were conducted on Nov. 30, and Dec.1, 2005.

Sampling Procedures

The Case Study Participants

A district contact identified all case study participants to represent their respondent categories. For the district interviews, respondents were classified into two categories. The first consisted of four *program representatives*: these district leaders managed program areas that directly affect students, such as instructional services. The second consisted of five *nonprogram representatives*: nonprogram representatives addressed issues involving accounting, fiscal management, and grants. Group interviews were completed, one for program representatives and another for nonprogram representatives. Throughout the report, both groups are referred to as district representatives.

The district representatives all had specialized management duties. These personnel were typically heads of departments overseeing one or more federal program for Seattle Public Schools. The scope of their responsibilities ranged from directing Title I operations to overseeing all *NCLB* implementation activities, including federal grant programs. Our respondents were in positions to make recommendations to Seattle's superintendent or board of education regarding the Local Flex program.

The case study participants for the nondistrict interviews were divided into three major categories. The *private school representatives* consisted of two principals from nonpublic Seattle schools, as well as a district representative who serves as their contact at Seattle Public Schools. The *state representative* was a federal funds manager from Washington's State Office of the Superintendent of Public Instruction (OSPI). The *public school representatives* were two public school principals. The district selected these individuals to participate and thus, we are unable to generalize their views as those of all departments and people affected by Local Flex. For instance, one of the public school principals had worked at the district office and may have a unique understanding of the district and federal programs compared to principals who have not worked at the central office.

Interview Protocol

Similar semi-structured interview protocols were employed for all representatives. Question wording was specific to the particular program at issue (i.e., communication with Seattle Public Schools, State Office of Public Instruction, private schools, etc.) and portions of the interviews

were further tailored for the particular respondent categories. All respondents with whom interviews were conducted possessed some level of familiarity with Local Flex and other forms of flexibility under *No Child Left Behind*.³ Copies of the interview protocols are included in Appendix A. Interviews ranged from 40 minutes to two hours.

³ All informants were provided with detailed explanations about the interviews before interviews took place. This ensured that respondents possessed some level of knowledge about the Local Flex demonstration program and reasons for the researchers' visit.

3. Results

Background on Seattle Public Schools' Participation in Local Flex

Seattle Public Schools is Washington state's largest school district, serving approximately 46,000 students in 100 schools. Its stated mission is, "To provide every student with effective, high quality teaching and learning experiences, relevant curriculum and support services, in a safe and healthy environment." A summary of district characteristics appears in Exhibit 1. Seattle Public Schools adheres to a highly decentralized paradigm in which authority for budgeting, staffing and instructional program decisions resides at the building level. Schools are expected to be accountable to the district and to reach student performance standards but are given leeway over budget, staffing, instruction, and curriculum in order to reach district goals through site-based decision making.

**Exhibit 1
Overview of Seattle Public School District: 2005–06 School Year**

Students					
Elementary	21,962	African-American	22%	Free and Reduced Price Lunches	41%
Middle	9,849	American Indian	2%	Special Education	9%
High	14,204	Asian	23%	Served Through ESL	12%
Total	46,105	White	41%	Number of Languages Spoken	100
		Hispanic	12%		

Staff	
Teachers	3,105
School Administrators	140
Student Support Staff	3,813
Office staff	861
Total Full Time	4,989
Total	7,919

Schools	
Elementary	59
Middle	11
High	12
K-8	8
Alternative	10
Total	100

Exhibit reads: Seattle Public Schools had 46,105 students in 2005. Forty-one percent of students were Caucasian, 22 percent Asian, 22 percent African-American, 12 percent Latino, and 2 percent American Indian.

Source: Seattle Public Schools, Office of Grant Services, 2006.

To prepare for the Local Flex application process, Seattle developed a five-year plan, which focused on strategies aimed at improving the quality and rigor of instruction, accelerating student achievement, and closing achievement gaps. This included identifying the highest need schools and targeting additional services to them, such as teacher coaches. In addition, all schools received additional support for new teachers through a new teacher mentor program. Through the development of the five-year plan for the Local Flex application, Seattle Public Schools underwent strategic planning, created new initiatives that directly influenced student learning, and increased collaboration within the district office and with private schools.

Application Process for Local Flex

Seattle Public Schools had a long history of advocating for additional flexibility and wanted to take advantage of new flexibility provisions provided in *NCLB*. Three major factors led to the district's interest in applying: 1) the district had experienced difficulty in meeting student's needs due to Title I funding limitations, 2) the district's goals closely corresponded with the *NCLB* legislation, and 3) the district had advocated for additional flexibility to meet its goals. Even prior to the 2001 legislation, the district's administrators sought block grant federal funding because the district had challenges meeting the needs of all students while dealing with the limits of Title I funding and other categorical federal programs. One district representative described the district's difficulties:

Because Title I was restricted in terms of eligible attendance areas, it also did not allow [the district] sufficient federal funds to meet the needs of students outside of those areas. [The district] found that [it] had to distribute Title I funds only to elementary grade levels because there were not sufficient funds, in terms of scope, to meet the needs of our middle schools and high schools.

In addition, the district priorities and improvement plans closely corresponded with the objectives of the *NCLB* legislation. One district respondent described the district's goals:

[The district] had goals that talked about meeting the academic achievement of all students and reducing disproportionality. So when No Child Left Behind came on, it was very similar to our tenets, and when Local Flexibility came on, it was very clear [T]here seemed to be a marriage for us [the district] to move in that direction. ... We felt at that time we had decision-making through school improvement plans that had a readiness for us to accept more flexibility for decision-making than maybe other districts that were more centrally-controlled.

The district's match with *NCLB*'s goals had been pre-dated by advocacy for additional flexibility to reach the goals of closing achievement gaps:

Because [the district] took such a heavy stance with our [U.S.] senators ... [the Department] built in [NCLB] a demonstration program to see [if] what was being proposed in Seattle and other school districts would in fact drive higher levels of performance academically if they had more flexibility. ... So, given the fact that we were such an advocate politically across the nation and we were known for our stance ... we were encouraged to be partnered in applying for a Local Flex demonstration program to make sure at least there was one district in the nation that was willing to take on the effort.

After Washington's State Office for the Superintendent of Public Instruction (OSPI) declined to apply for State Flex, the district applied for Local Flex. The application process was a collaborative effort involving Seattle Public Schools, OSPI, and the U.S. Department of Education. The state representative explained that the district consulted extensively with the OSPI prior to applying for the demonstration program and throughout the application process. In fact, the state representative indicated that the district and the state were partners in the grant

application. Seattle Public Schools initially submitted its Local Flex application in September 2002. After comments from a Department of Education peer-review panel, the proposal was revised and resubmitted in July 2003. At this point, Seattle Public Schools was the only district to submit a full proposal for the program. In November 2003, the U.S. Department of Education announced that the district had received Local Flex authority. When Seattle Public Schools was granted Local Flex at the end of 2003, the district was not able to actively utilize Local Flex during the 2003–04 school year because the budgeting process had already occurred and the school year was already underway. In addition, 2004–05 was the first year where the accountability requirements associated with Local Flex were in effect. Thus, the 2004–05 school year was the first official year of Local Flex implementation.

Plans for Local Flex

Seattle’s extensive efforts formulating a five-year plan resulted in U.S. Department of Education approval to exercise Local Flex authority enabling the district to consolidate funds from the four eligible program areas:

- Title II, Part A (Teacher and Principal Training and Recruiting)
- Title II, Part D (Enhancing Education Through Technology formula-based funds)
- Title IV, Part A (Safe and Drug-Free Schools and Communities)
- Title V, Part A (Innovative Programs)

These funds represent approximately 1 percent of the district’s \$420 million annual budget. Since the district began participation in the Local Flex demonstration program, the amount of available funds for consolidation has decreased each year. This was a result of both decreases in federal dollars allocated to the programs and declines in the student population in the district. Exhibit 3 shows the amount of funds available for consolidation each year beginning with the two school years prior to the district’s official participation in Local Flex (2002–03 and 2003–04).

Exhibit 2
Seattle School District: Federal Allocations by Program and School Year

Program	Prior to Local Flex	Transition to Local Flex	During Local Flex		Projected	Difference
	2002–03	2003–04	2004–05	2005–06	2006–07	2002–07
Title II, Part A	\$3,400,435	\$3,272,700	\$3,234,878	\$3,273,362	\$3,273,362	-\$127,073
Title II, Part D	\$393,515	\$338,514	\$324,144	\$233,104	\$130,538	-\$262,977
Title IV, Part A	\$438,676	\$397,880	\$395,680	\$358,759	\$287,007	-\$151,669
Title V, Part A	\$368,078	\$347,782	\$253,988	\$163,153	\$86,149	-\$281,929
Total Initial Allocation	\$4,600,704	\$4,356,876	\$4,208,690	\$4,028,378	\$3,777,056	-\$823,648
Total Carryover From Previous Year (when available)		\$1,110,772	\$1,124,893			
Final Total Available	\$4,600,704	\$5,467,648	\$5,333,583	\$4,028,378	\$3,777,056	-\$823,648

Exhibit reads: Total funding for all of these programs has decreased from \$4.6 million in 2002–03 to \$4 million in 2005–06 and is projected to fall to \$3.7 million in 2006–07.

Note: Projections calculated by Seattle Public Schools.

Source: Seattle Public Schools, Office of Grant Services, 2006.

As part of the agreement, the Seattle Public Schools District committed to using consolidated funds to address five specific areas, which the district developed as part of its five-year plan:

- Improve teacher knowledge, rigor and skill in the application of research-based practices and strategies for mathematics, literacy content and pedagogy.
- Improve teacher knowledge and skill in standards-based, culturally responsive teaching and learning, differentiation of instruction, and the use of data to inform instruction.
- Improve beginning teacher quality and preparation for service to underserved students of diverse backgrounds.
- Enhance the integration of technology in the classroom for teacher productivity and the teaching and learning program.
- Provide intervention and support services for academic achievement, reentry and substance abuse issues for targeted student populations.

Exhibit 3 shows a detailed summary of the five strategies and the funds allocated to the strategies in each of the year's the district has participated in Local Flex. District officials developed these targeted areas as part of the five-year plan in consultation with Washington's Office of the Superintendent of Public Instruction. Changes in district leadership, the district's organization based on categorical programs, and a restricted time frame constrained the district in its development of these goals. In addition, substantial reductions in federal program allocations to Local Flex eligible funds meant that the district had to make difficult funding decisions and could not fully fund all five strategies (see Exhibit 3). The decline in funds posed serious challenges to implementation. For example, the district was able to hire a director of equity and relations using district funds. In turn, the district reduced funds for teacher training in culturally responsive teaching and learning because they were able to cover this in a different way. In addition, the district incorporated a cultural component into the teacher coaching program.

To allocate available Local Flex funds, Seattle constructed a system that uses tiers to identify schools that should be targeted using the strategies funded by Local Flex. Tier 1 schools were selected based upon "urgency of need." These are schools in which all students need assistance to meet or exceed state standards in reading and mathematics and have generally not met AYP for at least one or more years. At the time of application 17 of Seattle's 100 schools were identified as Tier 1. Tier 2 schools are other schools with student populations that need support to bring them up to state standards and did not meet AYP for the previous year. At the time of application 26 of Seattle's school were identified as Tier 2. In addition, the Local Flex agreement required that each subgroup of students would meet or exceed their annual performance targets for each year of the five-year agreement.

Exhibit 3
Seattle School District: Local Flexibility Plan Overview 2004, 2005, and 2006

	Consolidated 2004	Consolidated 2005	Consolidated 2006
Strategies/Activities	Revised Plan 2003–04 by strategy	Initial Plan 2004–05 by strategy	Initial Plan 2005–06 by strategy
1. Improve teacher knowledge, rigor and skill in application of research-based practices and strategies for mathematics, literacy content and pedagogy.	\$ 1,848,448	\$ 1,767,266	\$ 1,213,092
1.1 Expert coaching in reading and mathematics.			
1.2 Comprehensive professional development in brain-based literacy instruction.			
2. Improve teacher knowledge and skills in standards-based, culturally responsive teaching and learning, differentiation of instruction, and the use of data to inform instruction.	\$ 423,349	\$ 262,500	\$ 39,920
2.1 Professional development for culturally responsive teaching and learning.			
3. Improve beginning teacher quality and preparation for service to underserved students of diverse backgrounds.	\$ 1,102,843	\$ 1,112,432	\$ 876,603
3.1 Mentors for beginning teacher of higher-need students and schools.			
3.2 Human resources for recruitment of quality teachers.			
4. Enhance the integration of technology in the classroom for teacher productivity and for the teaching and learning program.	\$ 360,052	\$ 311,578	\$ 267,437
4.1 Deployment of Instruction Technology Master Teachers.			
4.2 Provision of professional development for school-based technology teacher leaders.			
5. Provide intervention and support services for academic achievement, reentry and substance abuse issues for targeted students.	\$ 1,016,418	\$ 1,011,800	\$ 883,067
5.1 Hire intervention specialists.			
5.2 Support student reentry programs.			
5.3 Target support for bilingual students.			
5.4 Conduct a bilingual program review.			
5.5 Provide professional development for teachers of advanced learners.			
Funds for services for private school students and teachers	\$ 441,339	\$ 702,626	\$ 648,232
Total Direct Costs	\$ 5,192,449	\$ 5,168,202	\$ 3,928,351
Total Indirect Costs	\$ 275,200	\$ 165,382	\$ 100,027
Total Funds	\$ 5,467,649	\$ 5,333,584	\$ 4,028,378

Exhibit reads: Funding for all Local Flex programs has decreased over the past three years. Activities to improve reading and math teaching received the largest amount of funding (\$1.8 million in 2003–04 and \$1.2 million in 2005–06).

Source: Seattle Public Schools Annual Performance Report Year II, 2006.

Seattle Public Schools also set long-term, strategic goals to be achieved by 2013–14. Setting these goals was not required under the Local Flex agreement but was mandated by Washington Office of Superintendent of Public Instruction. They included the following goals:

- All students enrolled in Seattle Public Schools will reach or exceed state and district standards in reading and mathematics.
- Gaps in student achievement in reading and mathematics will be eliminated.
- The four-year cohort graduation rate for high school students will meet or exceed 85 percent.
- The unexcused absence rates for elementary and middle schools students will decrease to 1 percent.

Seattle’s Local Flex goals and initiatives were one part of reaching overall district goals, which were focused on helping the district make AYP. After not making AYP in the 2004–05 school year, Seattle was required by the state to develop and implement a District Improvement Plan (DIP).⁴ Seattle used the already existing five-year plan (created as part of the Local Flex agreement) as the platform for the DIP. In other words, Local Flex served as a framework for the DIP. The DIP expanded plans for the district to make AYP by targeting resources to students most in need at schools that had failed AYP.

Seattle’s use of Local Flex might be discontinued if the district fails to make AYP for the second consecutive year (as mandated in the Local Flex provision). Even with this possibility, however, the district remains confident that it would be able to continue to implement the current strategies (albeit with less flexibility), as Local Flex has served as an impetus for effective planning and coordination in Seattle Public Schools and these changes have become institutionalized. For example, the district anticipates maintaining coaches and mentors at some schools even in the absence of Local Flex authority. In addition, the fact that Local Flex funds represent only a small percentage of Seattle Public School’s overall budget means that the elimination of Local Flex authority would not have a drastic impact on the district’s activities.

Targeting Federal Funds to Meet Students’ Needs Through the Use of Local Flex

The main limitation of categorical funding from a district’s perspective is that funds cannot necessarily be allocated to programs and initiatives based on students’ needs. Local Flex allows the district to think strategically about student needs by working to achieve goals set by district leadership rather than just applying categorical funding as mandated. It also allows districts to rapidly respond to changing demands by reallocating funds as needs arise and to most effectively target services to schools and students with the highest needs.

The sections that follow explore the district’s new opportunities for planning that have arisen as a result of the district’s participation in Local Flex. They also examine how the district is

⁴ Adequate yearly progress (AYP) among school districts is determined by the academic performance among each student subgroup and the student population as whole in the district, as well as by the attendance and graduation rates at the district level. Seattle Public Schools did not meet adequate yearly progress in 13 of 71 target areas in the 2004–05 school year.

tracking progress toward the goals set out in its Local Flex application and the relationship between Local Flex and federal and state accountability. The case study took place when the district had been officially using Local Flex for just over a year and representatives indicated that the district was just beginning to fully utilize the program. However, the program appeared to have a substantial influence on district planning and coordination for a set of initiatives aimed at targeting students and schools with high levels of need.

New Possibilities for Planning

As described above, the original Local Flex agreement focused on five strategies Seattle Public Schools developed to better meet its students' needs. These strategic initiatives were developed as part of the application process for Local Flex through the district's five-year plan. One district representative explained that the district based the overarching initiatives and academic actions on what was needed to serve the district's students:

We developed the initiatives without looking at specific dollars. Once the initiatives were developed, then when the team was able to look at the dollars, they would say, "Okay, with this kind of flexibility, we can expand this, we can do this, we can do that." So, I think the ... implementation would have looked different without Local Flex; the initiatives themselves I don't think would have been different had we been categorical versus flexibility.

The district leaders were able to take advantage of the flexibility offered by the Local Flex program to better target eligible funds to the identified strategies. Increased flexibility meant they could focus eligible funds on the highest priority strategies identified in the five-year plan rather than being tied to the requirements of the categorical programs. This allowed district leaders to use funds in ways that were aimed at making a "better, bigger difference" for students.

The district's efforts to fully utilize Local Flex are still a work in progress, as the district only had one full year of implementation and experienced "huge transitions of leadership" during that time. One district representative explained that there have been significant personnel shifts and it had taken about a year to understand the possibilities that Local Flex presents. Furthermore, district staff indicated that implementing any kind of substantial change in process and strategy takes time and that only having a short period to show results was unrealistic given the complexities of a large, urban school district. As noted above, Seattle Public Schools did not make AYP in 2004–05 after not meeting 13 of 71 districtwide student performance targets, and there was concern among district officials that they might not make AYP in 2005–06 and thus lose their Local Flex authority. Overall, district officials indicated that they were disappointed that they may only have a relatively short period of time to implement the program because they believed it would take more time to experience the full benefits of the program.

While the district indicated that they had only begun to take advantage of Seattle Public Schools' participation in Local Flex demonstration program, they were confident that they would be able to better utilize it in the coming year. One district representative explained that district staff had been "siloed" into different departments (which were generally defined by different federal programs) prior to Local Flex. A more integrated approach to using funds was beginning to take

place with the introduction of Local Flex, although at the time of the case studies, “Title boundaries” had yet to be crossed (i.e., funding had not explicitly been moved from one Title program to another).

In addition, collaboration was occurring not just with programs that were a part of Local Flex but other federal programs as well. It appeared that Local Flex acted as an impetus for more collaborative efforts at targeting funds based on the initiatives set forth in the five-year plan. One district representative explained this need for collaboration by discussing gaps between groups of advantaged and less advantaged students:

We realize we can't do it in isolation. Local Flex can't close that gap and Title I can't close that alone, it has to be a concerted effort, across the board; maybe blending some funding from instructional services, student services, and school services.

Not only was funding consolidation needed, but staff collaboration was also essential to fully implement Local Flex. The district's traditional organizational structure around categorical programs and the high level of turnover meant that while funding consolidation was now available through Local Flex, the district was still working on the interpersonal collaboration necessary to fully implement the program. This process was explained in practical terms by another district representative, who explained that it had taken time to get know the other district management staff and learn to make difficult decisions together about limited resources:

So, it took me a year to sort of figure out what that would mean ... and getting to know each other and saying, 'Okay, these are the outcomes we're hoping for and these are the strategies that we've all agreed upon,' which has been very recent. And so, how do we then look at resources and use them in flexible ways? And are there some things we won't do anymore? And move those, that money from technology to [instruction], just because that's what we need to focus on right now.

These views from different district representative staff indicated that they expected to see an even stronger collaborative effort around targeting funds based on students' needs (and aligned with the Five-year plan) in the coming year. While staff believed the ability to coordinate planning would be more fully utilized in the coming year, many activities identified in the Local Flex agreement were already underway (see section below on specific initiatives and actions). One example was that through the Local Flex agreement, district leaders had identified Tier 1 and Tier 2 schools and this was used as criteria for providing additional services, most notably literacy coaches, to these schools.

Participation in Local Flex also proved advantageous for planning for the district's changing short-term needs. Using data to guide planning, adjustments were quickly made to target funds to the highest needs areas:

- The district had not hired many new teachers, so the district reduced the number of mentors and maintained the same number of literacy and mathematics coaches (which would have otherwise decreased because of reductions in funds available).

- The district shifted services based on data that indicated that some schools had changed from Tier 1 to Tier 2.
- Finally, the district was able to include a science focus because the state had collected data on students' needs in science.

District officials also suggested that flexibility would be useful for addressing larger or unexpected fluctuations in student needs. One district administrator used the example of receiving a sudden influx of immigrant students and suggested that they would be able to quickly reshuffle plans to better serve those students. Thus from the district's perspective, flexibility allowed for quicker and better reactions to small or large changes in district needs.

Finally, the district found increased flexibility very useful in a time of diminishing resources. The district was experiencing enormous financial challenges along with substantial decreases in funding allocations for the federal programs that are a part of Local Flex (see Exhibits 3 and 4). One district representative clarified the district's need for flexibility in challenging budget circumstances:

One of the reasons why we have such a great need for additional flexibility is the continued reduction in the amount of funds that we've received from federal, from state, from other grants, things like that. In a perfect world, it wouldn't matter if you were completely categorical or completely flexible because you'd have enough dollars. ... Because we don't have enough dollars in any pot to accomplish what our students need and to provide them the services that they really do require, the flexibility, the benefit of the flexibility is that it allows us to say, "All right, you're going to get nine [academic] coaches, 'cause I need two drug-alcohol people." I mean, so I think it's important to remember that the flexibility is great, but one of the reasons why we need it right now is we don't have enough funds to cover all the activities that we need to cover.

Flexibility allowed district officials to continue to fund initiatives that they viewed as most important in a time of limited resources. While Local Flex was very useful in a difficult budget period, district representatives indicated that even with more resources, Local Flex would still allow the district to better plan and develop initiatives to more fully meet students' needs. One district representative explained that having flexibility and having stable or increased funding would be the ideal.

Tracking Progress and Accountability

The Local Flex application process required Seattle to both develop and evaluate its progress toward long-term goals. Seattle used the Local Flex application process as a catalyst to assess district goals and address areas for improvement. At the same time, new accountability measures required additional tracking of student progress. Prior to the planning process that resulted in the Five-year plan and Local Flex application, the district had not yet developed means for assessing progress toward reaching district goals. Through the Local Flex application and planning process (in combination with other accountability requirements), Seattle developed a series of benchmarks to track progress toward the districts goals. One district representative explained this effort:

We're tracking our goals. We have benchmarks for a Five-year plan and we are tracking those. And we have data that shows whether or not we're making progress ... we did focus groups in schools, and we chose 25 schools where our instructional coaches were and we had three or four focus questions ... it really helped inform our work for this year.

This district respondent summarized Seattle's approach toward tracking progress in a "triangulated way" that involved reaching out to teachers using surveys and professional development offerings, as well as reviewing each school's transformation plan. In addition, the district collects student assessment data at the beginning and end of the year along with other student data related to student attitudes and behaviors and school climate. One district representative noted that new software allowed assessments to automatically appear on district forms. Collecting data from multiple sources along with new technology enabled the district to use data-driven methods in allocating Local Flex money in order to reach the needs of students that need additional support but are not in the Tier 1 or Tier 2 schools.

District respondents indicated that shifts in the state's accountability system did lead to some changes in the designation of schools as Tier 1 or Tier 2 but did not influence the district's implementation of Local Flex. While recent changes only led to minor changes in the allocation of Local Flex funds, district respondents indicated that new testing in the state of Washington and other potential changes to accountability measures could have a substantial influence on the future implementation of Local Flex.

Our kids change every year ... so, if we went to a continuous growth model, I think that could drastically affect our implementation of Local Flex because then we're going to be looking at trends. ... The other thing that makes me think about is that now we'll be testing at every grade level. The question of whether that will also affect where we see the need because it is true [that] cohorts of kids kind of move through, and you think, "Oh, whoops, we need to make sure this school has additional resources."

District respondents suggested that even in the face of major changes to accountability, Local Flex would be very useful, as it would allow the district to more easily respond to new requirements. With Local Flex, the district could immediately refocus resources based on student needs revealed by changes in the accountability system without having to inform the state or fill out additional paperwork. Similarly, if a particular school experienced an influx of students who needed additional academic support, the district could quickly provide additional resources to this school.

New Initiatives and Actions

District representatives reported that the implementation of Local Flex facilitated the identification of initiatives and actions that would help the district to reach its goals. Through the planning process that took place in conjunction with Local Flex, district respondents developed programs for the use of eligible funds that 1) targeted assistance to those students who need it most (Tier 1 and Tier 2 schools), 2) focused on improving reading and math skills, and 3) worked to build and maintain an effective, professional teaching corps.

Throughout the case study interviews, district, school and state respondents frequently identified two changes under the Local Flex initiatives: new on-site coaching and revamped teacher mentoring. These two initiatives received significant attention under the program as a result of the district's increased ability to strategically use its funds. While other initiatives were mentioned in the interviews (e.g., substance abuse intervention specialists), these two initiatives appeared to be the district programs most closely associated with Local Flex.

As a result of Local Flex, on-site coaches in specific content areas (literacy and mathematics) were introduced in district public schools. These coaches "support[ed] schools in content areas" and worked on curriculum alignment. Principals identified on-site coaches as the most visible manifestation of the Local Flex program. The coaches worked directly with teachers on reading and mathematics curriculum, instruction and assessment. In Tier 1 schools, the coaches helped to develop and deliver a schoolwide plan for ongoing professional development, including training, demonstration lessons, peer observation, and review of student work. In Tier 2 schools, coaches provided training to teachers to deliver targeted interventions for particular subpopulations. In addition to the direct benefit these coaches provided to the schools, they also came to serve as liaisons between schools and the central office.

A literacy coach in one public school was instrumental in improving that school's reading program. The coach met regularly with teachers to discuss assessment tools, data analysis and teaching strategies. In addition, the coach helped to produce personalized reading plans for students struggling with reading. School leaders that did not have on-site coaches in their schools receive support indirectly through trainings conducted by coaches:

We, the principals and the assistant principals, had special meetings to learn about the direct reading assessment, so we actually learned how to take the test, not to give the test, so that when our teachers did give the test, we would be able to talk to them about the data that they collect, or we would be able to help them if they were having difficulty with it. Well, we were trained how to do the direct reading assessment by one of the literacy coaches, so, again, that's an indirect service that we get because if there were no literacy coaches, who else would do the training?

These trainings provided teachers in all of the district's public schools with improved understanding of conducting classroom assessments and using data to better target teaching to improve students' learning in reading and mathematics.

In addition to literacy and mathematics coaching, the other program most closely associated with Local Flex was Staff Training Assistance Review (STAR), a mentoring program for new teachers. This program was given a new focus since the implementation of Local Flex. The district incorporated more formative assessment tools for mentors to use and increased training in such areas as equity issues. A district administrator identified this program as especially important for Seattle Public Schools due to the urban nature of the district:

That is important in terms of meeting student needs because, like many urban districts, it's also true that our beginning teachers are most likely to teach our

highest needs students, that they're more likely to be seen in schools with high numbers of kids of color, kids who are poor, and so on, and that what we've found is that Seattle actually does a really good job of retaining our beginning teachers.

In addition to one-on-one mentoring, STAR was meant to create “a strong professional learning community” that would decrease the likelihood of new teachers feeling isolated and, therefore, less likely to continue teaching in Seattle Public Schools. District and school leaders both indicated that they viewed the program as very effective with first-year teachers both in terms of improving their performance and retention.

District Management and Relationships with Schools Since Local Flex

One of the perceived challenges to participation found in the previous study of Local Flex centered on concerns related to the organizational capacity of districts and accounting burdens of program participation. This section focuses on how Seattle Public Schools addressed these potential difficulties by examining changes in management staff responsibilities and accounting since implementing Local Flex. In addition, it explores the district’s relationship with schools and the state before and since participation in Local Flex. None of these potential stumbling blocks or perceived concerns appeared to present much of an obstacle to the district. Furthermore, Seattle Public Schools’ relationship with schools and the state was generally positive and in many cases even stronger than it was prior to the use of Local Flex.

Changes in Leadership Roles and Responsibilities

Large districts are often organized around specific federal programs and Seattle Public Schools organizational structure follows this pattern. In turn, it would seem likely that implementing an authority allowing federal funds for a group of programs to be more flexibly allocated would lead to changes in the district staff’s roles and responsibilities. Interviews with the majority of district representatives, however, did not suggest that Local Flex had substantially changed their responsibilities for district-level activities. This may be attributable to the high level of turnover in management level positions in the district in the past few years. As few relevant employees remain from the pre–Local Flex period, it is difficult to gauge the possible changes in roles and responsibilities that have resulted from participation in Local Flex. However, most district staff did not indicate that their roles had changed substantially.

District representatives indicated that Local Flex (combined with a tighter budget situation) led to greater coordination among those responsible for federal funds. Furthermore, the district representatives expected that the level of coordination would continue to increase as the new management staff became increasingly familiar with the Local Flex program and how it could be used to meet district goals. One district respondent who had been in the same position prior to the district’s participation in Local Flex suggested that the consolidation of funds through Local Flex decreased administrative time and costs and allowed the district to focus on service delivery to schools, staff and students.

Changes in Accounting

In considering whether or not to participate in Local Flex, districts (and states) reported numerous concerns related to the perceived increases in accounting and reporting burdens associated with the flexibility demonstration programs. The district representatives responsible for accounting at Seattle Public Schools indicated that there was very little increased accounting burden as a result of participation in Local Flex. They attributed this fact to a new, fully integrated software suite the district began implementing in 2000 which had been modified to district specifications. The system includes a project module which holds data on every grant, a business to business module which integrates the Internet for ordering online supplies, materials, and equipment, along with all other business functions linked to financial transactions. Officials also had plans to transfer their human resources and payroll system from their old system to the new software package by 2007.

The new software has reportedly kept the challenge of tracking a mix of consolidated and categorical funds to a minimum. The system's ability to track financial transactions reduced potential accounting burdens related to Local Flex. Program managers and anyone else with online access to the data information could obtain updated balances on all grants individually. Officials reported being able to track the following information through the new program:

- All individual grants
- The award period
- The fiscal year
- The award amount
- The individual responsible for the grant
- The organization within the district where the grant is budgeted
- The current budget, past budget, encumbrances, expenditures, and available balance
- Allowable costs and special conditions
- The funding source (i.e., federal, local, state, etc.)
- The number of staff, as well as complete costs for each of the employees

The new system also enabled the district to label each of their grants with sub-codes, which was useful for financial reporting. Federal funds all have *Catalog and Federal Domestic Assistance* (CFDA) numbers, which are equal to reference numbers. The catalog is a database of all federal programs available from the federal government. The district was required to track all federal funds for purposes of financial accountability using this number along with a cross reference to the state of Washington accounting manual. Each of the grants that were part of the Local Flex funds that have been integrated into one program, has a separate CFDA number that has to be used when processing claims for reimbursement of district expenditures. The district explained that even though the Department of Education authorized an integrated program, fiscally they still have to be able to account for the funds separately.

One example of the advantage of the district's accounting system occurred in providing accounting information to the state. When Local Flex was implemented, the state and Seattle Public Schools held discussions regarding how to track the use of Local Flex funds. Each of the four programs involved has a separate CFDA number. The state is required to track each of

these programs individually. To ease the burden on Seattle Public Schools, the state offered to distribute the money for all four programs and allow Seattle Public Schools to submit invoices and requisitions as a percentage of the total of all four programs, rather than tracking each CFDA separately. Seattle Public Schools declined to take this option, because their financial tracking system allowed them to sub-code each grant and keep the tracking system as if it were still categorical. One district representative indicated that while accounting did not present a problem for Seattle Public Schools, it could represent a burden for other districts in Washington (and likely in many other states), because these districts do not have such a sophisticated accounting system in place. However, the software manufacturer does serve other public school districts and has services and software available to public sector organizations. Cost would vary depending on the size of the district.

District's Relationship with Public Schools

Views on whether Local Flex has affected the relationship between public schools and the district vary somewhat between district and school representatives. One district representative reported that the implementation of Local Flex has had little effect on the school-district relationship, because Local Flex is not a major aspect of the district's interactions with individual schools. The representative doubted that an individual teacher would be aware of the program.

Public school administrators interviewed for this case study, however, indicated that they found Local Flex made a noticeable and generally positive difference in the relationship between their school and the district. One principal only saw limited changes in his school's relationship with the district but imagined that "in some schools it's probably dramatically changed, where they have a coach there nearly full-time or two days a week. ... That would make a huge difference in the relationship." This speculation was borne out by another public school principal, who reported that the implementation of Local Flex has strengthened the school's relationship with the district. Having worked in the central office, this principal was aware of limited communication between the district and the schools. The school administrator identified the presence of academic coaches as improving the relationship between the school and the district: "[W]e kind of have a liaison that can go back and communicate our needs and can speak in central office. ... And the more people you have that are going back and forth, so to speak, it helps bridge that gap." Thus, while district administrators have not observed any major changes to the district-school relationship, school principals feel that the addition of coaches (who are viewed as part of a specific initiative resulting from Local Flex) strengthened the relationship by improving communication between the district and the schools.

As noted above, it is likely that those schools receiving specific services as a result of Local Flex-related initiatives experienced changes in their relationship with the district. Schools that did not receive funds may not fully appreciate the district's efforts. One public school principal in a more affluent part of Seattle pointed out that principals of schools in this area might not fully understand the distribution and value of Local Flex funds because these schools do not generally receive as much federal funding as schools serving more disadvantaged students. This principal understood and accepted the current distribution of funds but suggested that some other principals might not have the same level of understanding or acceptance.

Public school administrators had varying views on whether the implementation of Local Flex has changed their responsibilities in their school. While one principal indicated that there had been no change in roles or responsibilities since the implementation of Local Flex, another indicated substantive changes in perspective and improvements in mentoring new teachers. This public school principal believed that Local Flex dramatically changed perceptions of school principals' roles as leaders through working with literacy coaches, which were one of the focal initiatives for demonstration program funds. Prior to Local Flex, the principal envisioned an administrator's role that was "based on ... management, keeping the school running, providing opportunities for teachers if they wanted to take them, and working with teachers who were problematic teachers." After working with academic coaches, this principal came to the conclusion that an administrator role should be more of a teacher of other teachers than a manager. The principal explained, "[J]ust as good teachers change adolescent behavior, good coaches change adult behavior." This principal was training two other administrators as coaches (this principal's school did not receive additional coaches because it had not been designated a Tier 1 or Tier 2 school). This may have been a unique perspective as this principal worked closely with the academic coaches prior to returning to a principal position.

The same principal also found the new-teacher mentoring program very useful. Previous discussions with new teachers had been a two-person discussion between principal and teacher. The introduction of a mentor for new teachers provided additional observations of new teachers, increased contact time with more experienced teachers, and more fruitful three-way discussions. In addition to these benefits, the principal was no longer solely responsible for ensuring that new teachers were "learning things they needed to know in order to be successful." This school administrator noted that the new teacher-mentoring program was available to all schools, not just those designated as Tier 1 or Tier 2 schools.

In the area of reporting to the district, school principals indicated that there was a small increase in accounting responsibilities since the implementation of Local Flex. It was somewhat difficult, however, for the school administrators to distinguish between additional accounting required because of Local Flex and increases in reporting required by more intensive accountability measures. For example, one of the principals described new steps the district has taken to increase achievement, such as the tracking of individual students. Schools had to document each student who was not meeting the standards in reading, writing, or math (based on state assessments given in grades 4, 7, and 10). The schools administered building, district, state, and national assessments to these students to track their progress. In addition, schools documented steps taken to assist struggling students. This new tracking system was not a direct consequence of Local Flex but is a result of a range of multiple factors (e.g., state and federal accountability) that led to Seattle Public Schools to focus on the goal of having all enrolled students at or exceeding state and district standards in reading and mathematics by 2013–14.

Another public school administrator reported that there was a slight increase in accounting responsibility since the implementation of Local Flex. The district required that schools record their use of all federal dollars. The extra work associated with this task was estimated at one hour per week. At the same time, the district moved toward using a single comprehensive accounting form to cover funding from all initiatives, which eased the burden for school administrators. Some schools received funds related to four or more initiatives, each of which

previously required separate documentation. Use of one form instead of many made the accounting task much easier for principals. Thus, it appears that the district tried to mitigate reporting burdens associated with federal funds. At the same time, school administrators indicated an overall increase in reporting requirements, although this was not necessarily a direct result of the district's participation in Local Flex.

District's Relationship with Private Schools

While Seattle Public Schools' relationships with public schools remained about the same, its relationships with private schools appeared to have improved markedly since the district began participation in Local Flex. Private school leaders reported that prior to Local Flex, the relationships between Seattle Public Schools and private schools were not always smooth. Private school representatives indicated that they experienced four main problems in working with the district prior to Local Flex:

- The district was often slow in responding to requests for services. As all requests for federal funding for services were required to be submitted through the district, there were occasions when funds for services did not come through on time.
- High staff turnover in the district prevented the development of relationships that would facilitate effective communication between private schools and the district.
- Each private school within a particular group (e.g., diocese) dealt with the district on an individual basis and often had a different contact for each federal program; as a result, coordination was limited.

The private school representatives reported that because of these problems, there was a sizable amount of money each year set aside for services for private school students and teachers that went unused.

Since Seattle Public Schools began participating in Local Flex, private schools' relationships with the district appear to have improved substantially. The district used Local Flex funds to appoint a staff member to serve as a liaison between the private schools within the district's attendance area and the district on matters related to federal programs. The district's liaison facilitated communication through in-service meetings and a "private school coordination newsletter" that was published and distributed three or four times a year. Private school principals commented extensively on the improved communication between the district and private schools. One described meetings between the district and private schools as "very informative" and felt that district representatives "want to ... answer questions." Another principal added that the written materials related to Local Flex provided by the district had been very helpful in explaining Local Flex. Another private school official agreed that communications with Seattle Public Schools had improved. Furthermore, respondents identified Local Flex as having made relationships with the district "less complex" and "more positive."

Private school representatives identified a number of additional benefits associated with Local Flex and the streamlining of funds. These include:

- Increased ability to target funds to directly benefit students and meet particular goals combined with opportunity to use funds differently each year allowed the LEA in consultation with private schools to better direct available funds to meet their “true needs.” One private school administrator explained, “[W]hen we adopted One-Year Math as our goal ... funds [were used] for ... math; then, literacy was a goal and so we used one of the programs for literacy, more literacy books in the primary grades.”
- More efficient distribution of funds for services across schools.

All of these benefits point to the LEA being better able to direct the federal funds to meet the specific needs of private school students and teachers.

Participation in the Local Flex demonstration further improved private schools’ relationship through simplified reporting procedures. The district crafted an umbrella form that tracks the combined dollar amount for all of the Local Flex eligible programs as opposed to separate documentation for each program. Private school representatives reported that the use of an umbrella form that tracks the combined dollar along with a single district contact person was easier than having “four different managers tracking [the funds].” According to private school leaders, these improvements expedited the distribution of funds and limited bureaucratic delays. As a result, the LEA was able to spend the funds available for services for private school students and teachers, unlike in years prior to the use of Local Flex. Private school leaders suggested that the district relationship would be even better if all federal programs, especially Title I, could be part of Local Flex.

District’s Relationship with the State

Seattle Public Schools and the state Office of Superintendent of Public Instruction (OSPI) maintained close ties and communicated regularly on many issues prior to the implementation of Local Flex. Representatives of Seattle Public Schools served on numerous committees on grant management. Through this cooperation, Seattle Public Schools received many federal grants, including Comprehensive School Reform, Enhancing Education Through Technology, Learn and Serve America, Education for Homeless Children and Youths, and School Improvement Assistance. In addition, state program managers regularly visited Seattle schools and worked with the district to support federally funded grant programs. OSPI worked on the behalf of districts, including Seattle, to resolve issues raised by the state auditor’s office regarding allowable use of federal funds. In short, OSPI coordinated with Seattle Public Schools on a range of planning, program, and financial activities.

Before the introduction of Local Flex, the Seattle Public School District, like all districts in Washington state, was required to provide annually a “substantially approvable” application to OSPI that addressed Seattle’s use of funds from Title II, Part A; Title II, Part D; Title IV, Part A; and Title V, Part A. OSPI staff analyzed the information contained in that application to provide technical assistance to Seattle Public Schools and other districts. Now the district no longer has to provide an annual plan for the use of these funds because they have the five-year plan agreed on by the U.S. Department of Education under the auspices of Local Flex.

While the state was aware that the frequency and detail of Seattle Public Schools' reporting on the included federal programs would decrease with the implementation of Local Flex, the district continued to have a good working relationship with the state. As an OSPI representative reported, "I would not say there has been any significant change in the relationship between the state and Seattle" as a result of Local Flex. Several major federal programs, including Special Education and Title I, remained outside the Local Flex implementation. OSPI and Seattle Public Schools continued to coordinate effectively on those programs. In addition, the state and the district continued to collaborate on some of the federal programs that are part of Local Flex. For example, one district representative noted that OSPI officials regularly met with district representatives regarding Safe and Drug-Free Schools programs. Seattle Public Schools also participated in an OSPI evaluation project to measure the impact of these programs.

While the state had no direct involvement or oversight in the use of Local Flex funds, OSPI required that Seattle Public Schools submit a comprehensive program review each year that described the district's use of federal programs under the terms of *No Child Left Behind*. As a result, OSPI monitored Seattle Public Schools' overall use of federal funds but did not delve into the details of program activities related to Local Flex. Overall, there have been no major changes in the workload for OSPI as a result of Local Flex. Two factors contributed to this. First, Seattle is just one of several hundred districts in Washington, so the removal of one district was only a marginal change. Second, Seattle's grants management program was already well managed and required little technical assistance from the state.

In terms of specific programs that are a part of Local Flex, a state representative explained, "Seattle's Local Flex program has not changed this relationship or the manner in which the state supports district implementation of sound fiscal and accounting practices." For the four programs associated with Local Flex, district representatives coordinated with state officials to receive and appropriately account for Local Flex program funds. After discussions with OSPI and Seattle Public Schools, the U.S. Department of Education concluded that audit responsibility for Local Flex rests with the state auditor's office. Seattle Public Schools submitted financial requests to OSPI and received Local Flex funds through the state, but OSPI had no further oversight or responsibilities regarding Local Flex funds. A state representative explained that OSPI "now simply approve[d] anything they put on these budgets and trust that when we are monitored by our [state auditor's office] and [the U.S. Department of Education], this will not cause any problems."

District respondents indicated that the district had gained increased budget authority *vis a vis* the state since implementing Local Flex. The district was able to implement budget changes prior to receiving formal approval from the state. From the perspective of one district respondent, this was another way in which the district could respond "more quickly, to be able to fill in holes, to go to the subpopulation groups that the others don't allow us to go to because of too many restrictions." Again, Local Flex appeared to provide the district with more ways to respond to changing district needs.

While the relationship between the district and state remained strong, Seattle Public Schools' implementation of Local Flex posed a reporting challenge for OSPI. The state respondent indicated, however, that Local Flex presented less of a challenge than the Transferability

provision.⁵ While Local Flex stopped the need for individual reporting by federal program from Seattle to the state, the U.S. Department of Education still required reports from the state of Washington and the state did not want to have its largest district absent from this reporting. As an OSPI official noted, “There’s kind of a mismatch in the data we are requested to report and the activities that they’re doing under those individual programs because they’re no longer individual programs.” Nevertheless, the district accommodated the state by continuing to file reports. As one district representative explained, “[W]e’ve had to work with them in terms of assuring that they have not only interim reports but the annual reports, and still [provide] them data, even though it’s not part of the evaluation from OSPI.” This allowed the state to continue to provide an accurate picture of the use of their four federal program funds included in Local Flex.

Balancing Flexibility With the Intent of Federal Programs

The district took steps to guarantee that the intent of the federal programs consolidated in the Local Flex agreement continued to be met after the implementation of Local Flex. Seattle’s Local Flex application addressed how funds would be used to meet the intended purposes of the four affected programs. There were extensive discussions between state and district officials and, according to a state representative, “The district paid special attention to ensuring that the intended purposes of the four affected programs would still be met in some way.” In addition, district representatives indicated that that use of Local Flex had not influenced how they used other federal program dollars (e.g., Title I or Title III).

In practice, Seattle Public Schools successfully maintained focus on the four Local Flex programs by only shifting funds between those four programs; in other words, the funds made available through Local Flex did not go into a large pot used for general spending but rather remain earmarked for particular programs with the availability to use them in more flexible ways. As a district administrator described it, “Title II dollars are being spent on professional development, right, and we spend it on professional development. And Title V is about bilingual or innovative programs, and we do that. And I think because we haven’t really, totally broken down those containers to be one pot.” As noted earlier, the district’s initiatives did not cross eligible “Title boundaries.” Furthermore, the district’s effort to meet the intent of the Local Flex funds was supported by OSPI, which continued to provide technical assistance.

The district’s ability to maintain focus on the intent of the four Local Flex programs was, however, dependent on the availability of nonfederal funds to finance other key programs. A district administrator described the situation as follows: “Once we keep losing resources and we pour everything into one pot, I don’t know whether or not we’ll be able to do everything that we’ve been doing, in terms of meeting the *NCLB* programs.” District leaders expressed concern that continued budget constraints and reduced allocations to Local Flex eligible programs would make it difficult for them to meet the intent of all of the *NCLB* programs.

⁵ Seattle Public Schools used Transferability for one year prior to implementing Local Flex. District officials that had been in their positions during this period indicated that Local Flex was substantially better, as it offered the district substantially greater flexibility over eligible program funds. However, the majority did not remember district’s use of Transferability, because they were in different positions during the district’s use of the program.

4. Conclusions

Summary of Findings

The district, school, and state representatives participating in the case study painted an overwhelmingly positive picture of the district's participation in the Local Flex demonstration program. The relationships the Seattle Public School District office held with public and private schools remained similar or had improved since the implementation of Local Flex. The process of developing the Local Flex application and five-year plan appeared to set in motion strategic thinking around a set of goals for the district's students and the creation of a set of strategies and initiatives to reach those goals. In addition, new accountability measures along with required progress-tracking in the Local Flex agreement meant that the district was able to carefully assess schools and students to determine and target those most in need of additional services. The results of Local Flex transcended simple flexibility for a group of federal programs that represent a small portion of the district's overall budget. While the focus of Local Flex is the ability to use eligible funds more flexibly, the strategic planning and reporting associated with Local Flex encouraged programs targeted to student needs and collaboration among administrators.

While Local Flex has played a significant role in Seattle Public School's planning, the ability to fully utilize the flexibility offered by the demonstration program remained a work in progress in the district. The district had only implemented the program for one full academic year at the time of the case study and the district remained organized around the individual Title programs. District leaders, many of whom are new to their positions, were just beginning to fully understand the potential for the program and indicated that any change in a large organization takes time to enact. In addition, the district was the first in the country to participate in the program and thus there were no examples or best practices for district leaders to follow when implementing Local Flex.

Benefits and Challenges for Seattle Public Schools

The goal of this study was to examine Seattle's experience implementing the Local Flex demonstration program. The case study revealed a series of benefits and challenges related to the district's experience with Local Flex. The section below summarizes these findings, which address the questions developed to guide the study.

Benefits

Greater flexibility than other flexibility provisions. Not surprisingly, district officials found Local Flex preferable to Transferability. Under Transferability, only 50 percent of the funds associated with a given program were eligible for flexibility. The largest of the four programs, Title II, Part A, accounted for three-quarters of all funds eligible for Transferability. As a result, the amount of funds available to transfer into Title II, Part A, was rather limited. Under Local Flex, consolidation of all funds associated with the four programs was allowable, which, in turn, has enabled the district to use funds in the areas with greatest needs.

Rapid responses to changing district needs. As a result of the flexibility granted by Local Flex the district was able to quickly respond to changing district needs. For example, the district could quickly shift services after changes in accountability measures led to new schools being identified as Tier 1 or Tier 2. In addition, Seattle Public Schools gained increased budgeting authority, because the district no longer had to receive formal approval from the state for each Title program. This allowed the district to move more quickly to fill funding gaps or serve sub-populations that might not be receiving adequate services.

Increased ability to target funds to high needs schools and students. The initiatives in the five-year plan focused on initiatives and programs aimed at schools and students who need assistance the most. This was most frequently mentioned in terms of the teacher coach and new teacher mentor programs. While these initiatives would have been possible without Local Flex, state, school, and district officials all suggested that participation in the program allowed the district to more effectively develop plans and target funds toward reaching the district's goals. This is especially useful in a time of tight budgets and declining program funds.

Greater collaboration among district officials. Local Flex acted as an impetus to increased staff collaboration and cooperation at the district level. Prior to Local Flex, district administrators rarely communicated, because each administrator managed a specific set of funds and programs. Through participation in Local Flex, all of the eligible funds were combined and district officials were forced to discuss the use of Local Flex funds together rather than simply managing their own portion of funds. A district administrator described the development of a "professional community focused on outcomes for kids" as a direct consequence of Local Flex.

Decreased administrative burdens allowed more focus on services. District representatives indicated that the consolidation of funds through Local Flex decreased administrative burdens and costs and allowed the district to focus on providing services to schools and students. For example, the district no longer had to submit an annual plan to the state about the use of eligible program funds. Seattle Public Schools officials also identified a streamlined financial tracking system as one of the potential benefits of Local Flex. The district already had a sophisticated financial tracking system in place, so Local Flex caused little or no change to the district's financial record-keeping.

Improved services and communication with public schools. From the perspective of public school representatives, on-site coaches and the new teacher-mentoring program were the most visible benefit for public schools. Public school representatives indicated that schools with on-site coaches experienced improved communication between the schools and the district, because the coach acted as a liaison with the district office. Some schools in more affluent areas had less involvement with the district, because they did not have on-site coaches. One school representative indicated that these schools received services as a result of Local Flex funds indirectly through training programs and when applicable through new teacher mentoring.

Improved relationships with private schools. The relationship between the district and private schools improved markedly as a result of the district's participation in Local Flex. The district used Local Flex funds to hire a private school liaison on the joint recommendation of the private schools and senior district leadership, giving private schools a clear point of contact in the district and eliminating the frustrations of having to consult with four or more different federal

program managers in the district. The district crafted an umbrella form that tracked the combined dollar amount for all of the Local Flex eligible programs as opposed to separate documentation for each program. Private school representatives indicated that simplified reporting requirements in combination with greater flexibility in the use of the federal funds set aside for services for private school students and teachers.

Challenges and Untapped Potential of Local Flex

The findings indicated that Seattle Public Schools' experience implementing Local Flex was generally beneficial; however, district representatives identified a number of remaining challenges associated with the Local Flex demonstration program. In addition, case study respondents indicated that the district's efforts remained a work in progress and identified a number of areas in which the potential benefits of Local Flex were not fully exploited. District representatives suggested that these additional benefits could be derived through additional years of participation in the program.

Decreasing program funds. Over the last few years, Seattle Public Schools experienced a continual decrease in the amount of federal funding received under eligible programs, from \$4.6 million in 2002–03 to \$4.0 million in 2005–06. This was combined with decreases in the overall budget that made funding decisions especially difficult. Limited funds prevented full implementation of all best practice–based initiatives. While Local Flex allowed program administrators to focus on the highest priorities within the district, the flexing of dollars also meant that funds for some best practices would have to be reduced. As one district official described it, “If we’re going to do something more with limited resources, then we also have to say, ‘We’re going to do something less.’” Thus, while district administrators appreciated the ability to flex federal funds, their actions were still limited by the total amount of funds available. District officials indicated that the problem was exacerbated in recent years as the amount of Local Flex funds has diminished.

Limited number of eligible federal programs. District officials indicated that they would like flexibility extended to other federal education funds. District representatives highlighted what they viewed as a significant shortcoming in Local Flex: the relatively small amount of funds available for reallocation. One Seattle Public Schools official said he wished that the district could use a greater percentage of federal funds as it wished because he believed the current federal funds were not the most meaningful ones for the district (these programs only represented a small portion of federal funds allocated to the district). Specifically, the set of programs from which a district may consolidate funds under Local Flex does not currently include Title I. This provision was viewed as a significant limitation by district officials on the flexibility offered by Local Flex, as it effectively excludes the majority of federally derived funding from reallocation. Several district and private school representatives expressed a desire that Title I funds be included in Local Flex.

Difficulties overcoming tradition of categorical programs. While the Local Flex provisions required that the goals associated with the four programs still be met (and Seattle was clearly continuing to meet the intent of these programs), there was potential for Seattle to use Local Flex money to fund other educational strategies. District officials indicated that they were not fully taking advantage of the unique features that distinguish Local Flex from other flexibility

measures, such as Transferability. In addition, the district had yet to take full advantage of the opportunity presented by Local Flex to integrate and streamline its staffing responsibilities. After the implementation of Local Flex, there was no longer a need for a district-level director for each of the affected programs. A district representative identified the difficulty in changing established programs and job positions as a contributing factor in Seattle's decision to use Local Flex funds only for the original four programs. District representatives described the situation as a work in progress in which the district hoped to take full advantage of opportunities for collaboration and initiative development in the coming year. For example, one administrator now oversees some collaborative projects that previously had individual directors, effectively "breaking down silos" and allowing for consolidated, integrated use of funds.

Limited communication with the public about Local Flex's opportunities. Seattle Public Schools did not fully create community understanding of Local Flex and the district's efforts to use it to reach *NCLB*'s goals. A district official viewed Local Flex as "a tremendously positive public relations, communications tool" because it could make the community aware of the district's work to reduce achievement gaps. Furthermore, this representative explained that participation in Local Flex tells the community that the district is proactive in its efforts, "because this was [a] choice; we didn't have to do this. We're doing it for the right reasons. And the reason we're doing it is to improve academic achievement and the purposes of not only *No Child Left Behind* but the flexibility that allows us to do it." But, aside from making its annual Local Flex report available to the public, the district did little to inform the community. District representatives indicated that this represented a potential powerful untapped benefit of participating in Local Flex.

Short time horizon for success. District representatives expressed concern that they may not have enough time to take advantage of all the benefits of the program because the district faced the risk of losing Local Flex if the district did not achieve adequate yearly progress for two consecutive years. The district failed to meet 13 of 71 student performance targets in 2004–05 and would be in danger of failing AYP again by missing any of those targets in the 2005–06 school year. High levels of turnover in district leadership made the potentially short time for implementation even more difficult. District officials indicated that two years would not be enough time to implement the types of substantive changes made by possible by Local Flex. Representatives indicated that such change was especially difficult for a large district. From their perspective, it made little sense for a demonstration program to not have time to show the full benefits that flexibility can offer.

Concluding Thoughts

Seattle Public School's participation in the Local Flex appeared to be a positive experience that led to thoughtful planning and implementation of programs targeted toward goals laid out in the plan. However, the short implementation period combined with a difficult budget situation have made it difficult for the district to fully take advantage of the new opportunities Local Flex offers. Yet, since implementation of the program there were clear improvements in collaboration within the district office and between the district and schools both public and private. As it is very closely coordinated with the district's larger accountability effort, it is difficult to evaluate outcomes specifically attributable to Local Flex, but district officials saw the program as a useful tool to help the district reach its academic goals.

Appendix A: Interview Instruments

While this protocol represents a general framework that was used to guide conversations, discussions and questions were tailored for the specific recipients being interviewed including state representatives, district representatives, public and private school officials, to highlight their particular areas of expertise. Each category of officials interviewed contained fewer than nine respondents.

CASE STUDY SEATTLE PUBLIC SCHOOLS' USE OF LOCAL FLEX

INTERVIEW WITH DISTRICT REPRESENTATIVE

Statement of Purpose

The *Elementary and Secondary Education Act (ESEA)*, as amended by the *No Child Left Behind Act (NCLB) of 2001*, provides states and school districts with new types of flexibility in their use of federal resources in return for greater accountability. This case study examines the use of the new “Local Flex” demonstration program, which authorizes the secretary of education to enter into local flexibility agreements with up to 80 school districts. These districts may consolidate funds from up to four eligible programs to use for any educational purpose authorized under *ESEA*. The four programs are:

- Title II, Part A (Teacher and Principal Training and Recruiting)
- Title II, Part D (Enhancing Education Through Technology)
- Title IV, Part A (Safe and Drug-Free Schools and Communities)
- Title V, Part A (Innovative Programs)

Funds consolidated under Local Flex are no longer bound by specific program requirements and may be used for any purpose or activity consistent with *ESEA*. In exchange for this increased flexibility, participating districts must develop a clear, detailed five-year plan of action that articulates their rationale for seeking enhanced flexibility authority, delineates a concrete strategy for the consolidation and utilization of affected federal resources, and presents a convincing case that these actions will serve to facilitate the attainment of specific educational goals.

In November 2003, Seattle Public Schools was granted the Local Flex authority, the only district in the country to have that authority. A previous study identified a number of factors that contributed to low application rates⁶ including competing priorities, limited organizational capacity, lack of information about Local Flex, an inability to distinguish the unique features of the various flexibility programs, and the perception that the costs of participation outweighed the benefits. However, these potential challenges did not prevent Seattle from successfully applying for this program. This case study examines Seattle’s experience with the Local Flex program, including both benefits and challenges that the district has experienced in implementing the program.

Evaluation Questions

1. Does Local Flex allow the district to better target federal funds to meet students’ needs?
2. Does Local Flex facilitate initiatives or programs that the district has specified in its five-year plan?
3. Since implementing Local Flex, what changes have occurred in district accounting, management roles and responsibilities, and the district’s relationships with private and public schools?
4. How does the district balance the needs and requirements of flexibility while ensuring that the intent of federal programs included in the agreement is met?

⁶ In 2003, there was one applicant for State Flex and three applicants for Local Flex.

Sample

The majority of respondents will be district-level administrators or program officers involved in implementing the Local Flex program. We will also speak with representatives from public and private schools to explore how the relationship between schools and districts has evolved under Local Flex. Finally, we will speak with a state finance representative and the state federal programs coordinator.

Interview Protocol

Thank you for meeting with us today. I'm Gayle Christensen and this is Kathleen Feehan from the Urban Institute in Washington, D.C. We're here on behalf of the U.S. Department of Education, which has commissioned the Urban Institute to conduct a case study of Seattle Public Schools' experience implementing the Local Flex demonstration program, in order to provide other districts and states with information about the opportunities and challenges that have resulted from Seattle's participation in Local Flex.

Your responses provide extremely valuable information and we are pleased to have your participation. We would like to tape-record this interview to ensure that your responses are accurately recorded. We work very hard to keep all information you provide confidential and will not ever use your name in connection with your responses. To the greatest extent possible, we will not provide any individually identifying information in reporting your responses and avoid using specific titles when possible. While there is always a slight risk of participant identification in a case study of one, we will work hard to maintain strict confidentiality. We thank you in advance for providing the expertise and time needed for this case study.

Respondent Background

1. I would like to start by asking you about the work you do in your current position. Could you tell me about your roles and responsibilities in the district?

Probe if not offered:

- ___ What is your current title?
- ___ How long have you been in this position with Seattle Public Schools?
- ___ What is your professional background?
- ___ How long have you worked in the education field?
- ___ What were your previous administrative or teaching positions?
- ___ What is your specific role with Local Flex?

2. Please think back to the time before Seattle Public Schools started using Local Flex. Did the district have certain constraints on the use of federal funds that prevented it from effectively addressing its educational priorities? Please describe.

Probe if not offered:

- ___ Was the funding in particular programs inadequate for needs?
- ___ Was the distribution of allocated funds across programs poorly aligned with educational needs?
- ___ Did rules and regulations of particular federal programs impose significant restrictions that affected your district's ability to meet its most important priorities?

3. Could you describe the decision-making process that led to Seattle Public Schools adopting Local Flex? (NOTE: Only those who were at Seattle Public Schools when the process took place will be asked this question).

Probe if not offered:

- _____ *Who were the key actors and organizations involved in this process?*
- _____ *As [respondent title], what was your role in this process?*
- _____ *Did your district consult with local private schools when deciding whether and how to pursue Local Flex?*
- _____ *How long did this deliberation process take? Was there sufficient time to investigate thoroughly before the deadline for notifying Washington's SEA?*

Evaluation Question 1: Does Local Flex allow the district to better target federal funds to meet students' needs?

4. While the state does not have any oversight over Seattle Public Schools' use of Local Flex, has your district had any communication about Local Flex with Washington's state education agency (SEA), either at the time you were deciding whether to adopt Local Flex or after you decided to adopt Local Flex? Please describe.

Probe if not offered:

- _____ *What was the nature of this dialogue?*
- _____ *Would Seattle drawdown funds, how?*
- _____ *Would Seattle report uses under the separate programs how?*
- _____ *Would the state report uses of funds to ED? Please describe.*
- _____ *While the state has (had) no authority to limit or restrict Seattle's use of Local Flex, did the state raise issues or concerns about Seattle's plan to use Local Flex? How did Seattle handle the state's concerns?*
- _____ *Did the state provide technical support or other assistance with preparing Seattle's Local Flex application?*

5. Has Local Flex allowed Seattle Public Schools to better target federal funds to meet students' needs? Please describe specific examples if possible.

6. Are there challenges from Seattle Public Schools' participation in Local Flex? Please describe.

Probe further if not offered:

- _____ *What are possible challenges from the district perspective?*
- _____ *What might be challenges from the school perspective?*

- _____ *What types of challenges (e.g. accounting or record keeping) has the district experienced?*
- _____ *Were there challenges you did not anticipate? Please explain.*
- _____ *Have there been challenges in terms of reporting activities that extend above and beyond those required under NCLB?*

7. How have you addressed these challenges and what were the results of these efforts?

8. Are there benefits from Seattle Public Schools' participation in Local Flex? Please describe.

Probe further if not offered:

- _____ *Information about the successes in initiating new districtwide programs or programs aimed at Tier I schools.*
- _____ *Information on planning successes that may have allowed the district to better target funds to meet the needs of students.*

9. Is Local Flex meeting the district's needs for additional flexibility in use of federal funds?

Probe further if not offered:

- _____ *If yes, how is Local Flex meeting the district's needs?*
- _____ *If no, what are the areas where the district would like additional flexibility?*

10. Have changes been made to the Local Flex Plan since the first year of implementation?

Probe further if not offered:

- _____ *What specific changes?*

11. Prior to using Local Flex, Seattle Public Schools used Transferability. Are there advantages or disadvantages for the district in comparing the two provisions? Please explain.

Probe further if not offered:

- _____ *Why was Local Flex chosen instead of just using Transferability?*
- _____ *What are the benefits and costs for the district resulting from participation in Local Flex as compared to Transferability?*

Evaluation Question 2: Does Local Flex facilitate initiatives or programs that the district has specified in its five-year plan?

12. Does Local Flex facilitate specific initiatives or programs that Seattle has specified in its five-year plan? Please explain.

Probe if not offered:

_____ *What specific activities or programs are supported by the consolidated funding?*

13. Would these initiatives be possible *without* using Local Flex? Please explain.

Probe further if not offered:

_____ *To what extent?*

_____ *Are there specific reforms (e.g. interventions, strategies) that Seattle Public Schools would not be able to carry out in the absence of Local Flex? Please describe.*

14. Does Local Flex aid or hinder Seattle in planning for its District Improvement Plan?⁷ Please explain.

Probe further if not offered:

_____ *Does your district find it easier to coordinate across programs because funds are not coming to the local education agency (LEA) in stovepipes?*

_____ *To what extent does Local Flex affect planning the district's local improvement plan?*

15. How is Seattle tracking whether it is making progress toward meeting its long-term goals?⁸ Has the district achieved any interim progress indicators or benchmarks?

⁷ Goals for District Improvement as stated in Seattle Public Schools District Improvement Plan, 2005–07:

- 1) Seattle Public School District will meet the AYP targets in reading and mathematics each year for all categories and grade levels that are assessed by the WASL. In the case where the AYP target is not met, the minimum goal is to achieve the “safe harbor” provisions (10 percent reduction in the number of students not meeting the standard).
- 2) Seattle Public School District will continue to achieve AYP unexcused absence targets for schools with grades one to eight.
- 3) Seattle Public School District will achieve AYP graduation rate targets for schools with grades 9 to 12.

Probe further if not offered:

_____ *Can the district provide any data showing positive trends toward meeting these goals?*

16. Do changes in Washington's state accountability system and the Congress's *No Child Left Behind* requirements affect the district's implementation of Local Flex? Please explain.

Evaluation Question 3: Since implementing Local Flex, what changes have occurred in district accounting, management roles and responsibilities, and the district's relationships with public and private schools?

17. How does your district maintain financial records for documenting the way in which applicable funds are used under Local Flex?

Probe further if not offered:

_____ *Are funds moved from one program account to another?*

_____ *Is a new separate account established for consolidated funds?*

_____ *Do consolidated funds remain in the original account but documentation is maintained to show how those funds have been reclassified?*

_____ *Other (please specify).*

18. What is your specific role with accounting and record keeping with respect to Local Flex?

19. Are record keeping and reporting requirements different under Local Flex from what the district would be expected to do if it were not exercising Local Flex? If record keeping and reporting differ, did Seattle Public Schools encounter any challenges in meeting these requirements? Please describe.

20. Has use of Local Flex changed public schools' relationships with the district? Please describe.

⁸ Seattle states its long-term goals for 2013-14 as follows:

- 1) All students will reach or exceed state and district standards in reading and mathematics
- 2) Elimination of gaps between groups in student achievement
- 3) Decrease the unexcused absence rate to 1 percent
- 4) Achieve a four-year graduation rate of 85 percent

21. Has use of Local Flex changed private schools' relationships with the district? Please describe.

22. Has using Local Flex affected your work responsibilities?⁹ Please explain.

Probe if not offered:

_____ *Has this allowed you extra flexibility in your specific program area?*

Evaluation Question 4: How does the district balance the needs and requirements of flexibility while ensuring that the intent of federal programs included in the agreement is met?

23. Has Seattle Public Schools been able to meet the intent of the *NCLB* programs included in the Local Flex agreement? Please explain.

Probe if not offered:

_____ *What has the district done to ensure these program goals are met?*

24. Has using Local Flex affected your district's use of other *ESEA* programs? Please describe.

25. Has the district needed to balance competing priorities in choosing how to use Local Flex consolidated funds? Please describe.

Probe if not offered:

_____ *Has Seattle Public Schools had to adapt to any new or more urgent priorities? Please describe.*

Conclusion

26. From our understanding, previous district leadership advocated for educational flexibility. Have any changes in leadership affected district support for Local Flex? Please describe.

27. Are there any other topics that we have not talked about that you think are important for understanding Seattle Public School's experience using Local Flex?

⁹ This question is contingent on the person's role and will be specific depending on whether we are speaking to a Title I representative, administrator, teacher, etc.

Probe if not offered:

_____ *Are there unintended consequences—either positive or negative—as a result of using Local Flex (e.g., related to fund allocation, support for programmatic activities, or student, administration, and teacher outcomes)?*

Thank you very much for taking the time for this interview today. Your insights will be extremely helpful in our efforts to learn more about Local Flex.



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