

Comprehensive School Reform (CSR) Program Guidance

A. INTRODUCTION

A-1. What is the purpose of the Comprehensive School Reform (CSR) program?

The purpose of the Comprehensive School Reform program is to improve student achievement by supporting the implementation of comprehensive school reforms based on scientifically based research and effective practices so that all children, especially those in low-performing, high poverty schools, can meet challenging State content and academic achievement standards.

The program is built on the premise that unified, coherent, and integrated strategies for improvement, knitted together into a comprehensive design, will work better than the same strategies implemented in isolation from each other. CSR is efficient and encompassing; it demands the application of scientifically based research or strong evidence of effectiveness both to individual components of the reform design and to the relationship of those components to each other. Improving instruction without attending to leadership, improving leadership without emphasizing parent involvement, or concentrating on high academic standards without addressing the barriers to learning that affect so many students indicate a flawed and inadequate approach to comprehensive problems.

This approach makes the CSR program different from past reform efforts and is especially compelling in schools where the need to reform is urgent. Its appeal to practitioners is clear: the eleven required components of a comprehensive school reform program address specific elements that are important in the daily life of schools: strong academic content and research-based strategies; measurable goals; support by and for staff; professional development; parental involvement; technical assistance; evaluation; and the allocation of resources, brought together in an integrated, comprehensive design.

Participating in the CSR program takes preparation on the part of schools. Before they can receive CSR funds, interested schools must conduct a comprehensive needs assessment and analyze their findings in order to establish improvement targets and create plans to address them. CSR funds are not used for planning or fact finding; they are intended to help schools implement a design for comprehensive reform. The CSR program provides schools with the resources to make substantive and significant changes in their approaches to teaching and learning.

A-2. How is the CSR program connected to other education improvement initiatives?

The Comprehensive School Reform program can be thought of as a framework that supports and strengthens other education improvement initiatives. By design, the program requires local educational agencies (LEAs) and schools to draw together individual initiatives that focus on specific areas and weave them into a comprehensive school reform design based on eleven required components.

The CSR guidance references other sections of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act of 2001. These references are designed to highlight the strong connection between comprehensive school reform and other initiatives, including improved teacher quality, parent involvement, and increased accountability. (See B-1 and I-3.)

The reauthorized bill signals a renewed commitment to reaching and teaching all children. It details a variety of strategies and initiatives to ensure the access of all children to effective, scientifically based instructional strategies and challenging academic content. It emphasizes accountability for student achievement and the crucial importance of improving public schools. The Comprehensive School Reform program offers a pragmatic, realistic, appropriate venue for LEAs and schools to participate in this important initiative.

A-3. What statutory authority authorizes the CSR program?

For FY 2002, Congress appropriated CSR funds under two separate authorities – the Comprehensive School Reform authority in Title I, Part F of the ESEA, and the Fund for the Improvement of Education (FIE) authority in Title V, Part D of the ESEA.

CSR funds made available under Title I, Part F must be used to support comprehensive school reforms in schools that are eligible for funds under Part A of Title I. CSR funds made available under the FIE authority may be used to support comprehensive school reforms in both Title I-eligible and non Title I-eligible schools. Appendix A contains a copy of the Title I, Part F legislation. Except for those provisions in Part F relating to funding Title I-eligible schools, the FIE funds are subject to the same requirements as the Part F funds.

Where appropriate, this guidance will make distinctions between the two CSR authorities.

A-4. How does the new Comprehensive School Reform (CSR) program differ from the predecessor Comprehensive School Reform Demonstration (CSR-D) program?

The principal differences between the new CSR program and the predecessor CSR-D program include the following:

- **Authorizing legislation** – The ESEA now expressly authorizes the CSR program (Title I, Part F of the reauthorized ESEA). In previous years, the program was governed by language in the appropriations legislation and accompanying conference reports. For FY 2002, Congress appropriated funds under the new CSR authority in Title I, Part F as well as under the broad FIE authority. (See Appendix A.)
- **Scientifically based research or strong evidence of success** – The new legislation contains a stringent requirement that funded schools must implement a comprehensive school reform program that is found, through scientifically based research, to significantly improve the academic achievement of participating students, or is found to have strong evidence that it will accomplish this goal.
- **State educational agency (SEA) responsibilities** – Under the new legislation, SEAs must ensure that CSR funds are limited to comprehensive school reform programs that include each of the eleven required components, have the capacity to improve the academic achievement of all students in core academic subjects, and are supported by high-quality technical assistance providers.
- **Accountability** – SEAs must now conduct annual evaluations of the implementation of comprehensive school reforms and measure the extent to which the reforms have resulted in increased student academic achievement. SEAs must submit a copy of their annual CSR evaluation to the U.S. Department of Education.
- **Priority in awarding subgrants** – Specific statutory language now requires SEAs to give priority in the awarding of subgrants under Title I, Part F to LEAs or consortia of LEAs that (1) plan to use the funds in schools identified for improvement or corrective action under section 1116(c) of the ESEA; *and* (2) demonstrate a commitment to assist these schools in their reform efforts. (See F-2.)
- **Support for teachers and professional staff** – The new legislation contains an explicit requirement that a comprehensive school reform program provide support for teachers, principals, administrators, school personnel staff, and other professional staff. (See B-1.)

A-5. When do the new CSR program requirements apply?

The new CSR requirements apply to current and future subgrantees as follows:

- *For subgrants made on or after July 1, 2002*
An LEA or a consortium must comply with the requirements in the new CSR legislation in order to receive a new CSR subgrant or a CSR continuation award on or after July 1, 2002.

Example: An LEA has previously received two years of funding under the predecessor Comprehensive School Reform Demonstration (CSRSD) program. The LEA may receive its third year of funding only if it complies with the new legislative requirements.

- *For subgrants awarded prior to July 1, 2002*
If an SEA has awarded a CSRSD subgrant to an LEA or consortium prior to July 1, 2002 and funds remain available for obligation, the LEA may continue to obligate those funds under the predecessor CSRSD authority prior to the beginning of the carryover period for those funds. As soon as the carryover period begins, the LEA must comply with the new CSR requirements.

Example: An LEA has received FY 2001 funds under the predecessor CSRSD program. (Those funds become available for obligation on July 1, 2001 and remain available for obligation through September 30, 2003.) A portion of those funds has not yet been obligated. The LEA may obligate and expend those funds under the predecessor CSRSD authority through September 30, 2002. During the carryover period (i.e., October 1, 2002 through September 30, 2003) however, the LEA may not expend these funds until it complies with the requirements of the new Comprehensive School Reform program.

A-6. What are the benefits of the new CSR program requirements?

The purpose of the Comprehensive School Reform program is to provide incentives for large-scale reform, especially in schools that are not succeeding in effectively teaching all children. The new CSR legislation sets more rigorous requirements for the design and implementation of these programs. Specifically, it identifies eleven components essential to successful CSR programs and emphasizes the use of scientifically based research in creating designs for teaching, learning, and school management. Because a strong CSR program predicts a greater likelihood of positive impact on student achievement, the Department encourages States, LEAs, and their

schools to view the new, more stringent requirements of the CSR program as a means of strengthening their comprehensive school reform efforts.

B. COMPONENTS OF A COMPREHENSIVE SCHOOL REFORM PROGRAM

B-1. What is a comprehensive school reform program?

A comprehensive school reform program is one that addresses each of the following eleven components in a comprehensive and integrated design:

1. Proven methods and strategies based on scientifically based research -

A comprehensive school reform program employs proven strategies and methods for student learning, teaching, and school management that are based on scientifically based research and effective practices and have been replicated successfully in schools.

Component one emphasizes the need for schools, in designing their comprehensive reform program, to employ proven strategies and methods that are grounded in scientifically based research in core academic subjects, especially mathematics and reading. Staying focused on academic achievement, building a comprehensive program that supports it, and emphasizing “what works” in the classroom are important elements of a successful comprehensive design.

2. Comprehensive design - A comprehensive design for effective school functioning integrates instruction, assessment, classroom management, professional development, parental involvement, and school management. By addressing needs identified through a school needs assessment, it aligns the school’s curriculum, technology, and professional development into a plan for schoolwide change. The ultimate goal of this design is to enable all students to meet challenging State content and student academic achievement standards.

3. Professional development - The program provides high-quality and continuous teacher and staff professional development and training. The professional development involves proven, innovative strategies that are both cost effective and easily accessible and ensures that teachers are able to use State assessments and challenging State academic content standards to improve instructional practice and student academic achievement.

Well-designed professional development activities increase all teachers’ knowledge of both the academic subjects they teach and effective instructional strategies that are grounded in scientifically based research. They include strategies such as partnerships with institutions of higher education and

address such topics as the use of data and assessment; the use of technology; and improving the instruction of special needs children.

This professional development is intensive, sustained over time and classroom focused. Those who participate in professional development also help to design it, and the design is well integrated with school and district educational improvement plans. The professional development component is regularly evaluated to gauge its impact on increased teacher effectiveness and improved achievement. Strategies employed are consistent with high-quality professional development as described in Title II, Part A of the ESEA.

4. Measurable goals and benchmarks - A comprehensive school reform program includes measurable goals for student academic achievement and establishes benchmarks for meeting those goals. The Department encourages LEAs to link these goals to the State's definition of adequate yearly progress (AYP) in Section 1111(b)(2) of the ESEA.

5. Support within the school - Teachers, principals, administrators, and other staff throughout the school support the program in a CSR school. They demonstrate this support by, among other activities, understanding and embracing the school's comprehensive reform program, focusing on continuous improvement of classroom instruction, and participating in professional development.

6. Support for teachers and principals - A CSR program provides support for teachers, principals, administrators, and other school staff by creating shared leadership and a broad base of responsibility for reform efforts. The program encourages teamwork and the celebration of accomplishments. These and other means of support are part of the school's comprehensive design.

7. Parental and community involvement - The program provides for the meaningful involvement of parents and the local community in planning, implementing, and evaluating school improvement activities. In addressing this component, schools create strategies that are consistent with the parental involvement requirements of Title I, Part A. (See section 1118 of the ESEA.) Schools pay special attention to building parents' capacity for involvement and design ways in which parents can be brought into the instructional program and contribute to the academic achievement of their children.

8. External technical support and assistance - The program uses high-quality external support and assistance from an entity that has experience and expertise in schoolwide reform and improvement, which may include an institution of higher education. The CSR legislation requires that SEAs ensure that funded programs are supported by qualified technical assistance providers that have a successful track record, financial stability, and the capacity to deliver high-quality materials, professional development for school personnel, and on-site support during the full implementation period of the reform.

9. Annual evaluation - The program ensures accountability by including a plan for the annual evaluation of the implementation of school reforms and the student results achieved. The evaluation helps ensure that the school is making progress toward achieving its measurable goals and benchmarks and that necessary adjustments and improvements will be made to the reform strategies.

10. Coordination of resources - The comprehensive program must identify Federal, State, local and private financial and other resources that schools can use to coordinate services that support and sustain comprehensive school reform.

11. Strategies that improve academic achievement - The program must meet one of the following requirements:

- the program has been found, through scientifically based research, to significantly improve the academic achievement of participating students;
or
- the program has been found to have strong evidence that it will significantly improve the academic achievement of participating children.

Using all eleven components, schools must create a comprehensive, integrated reform program that affects all subjects, all teachers, and all children in the school.

Although teaching and learning activities are at the heart of every school program, the other CSR components define additional elements that are crucial to the successful day-to-day operation of every school. Attending to those details and their interrelationship with each other will have a positive impact on student achievement. Appendix B offers additional guidance for assessing the comprehensiveness of school reform plans.

Therefore, it is critical that each component be part of a school's program and that the overall design be composed of proven strategies, methods and practices that either (a) have been found, through scientifically based research, to significantly improve the academic achievement of participating children; or (b) have been found to have strong evidence that they will significantly improve the academic achievement of participating children.

B-2. What is scientifically based research?

Scientifically based research, as defined in section 9101(37) of the ESEA, is research that involves the application of rigorous, systematic, and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs. To meet this standard, the research must –

- Employ systematic, empirical methods that draw on observation or experiment;

- Involve rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn;
- Rely on measurements or observational methods that provide reliable and valid data across evaluators and observers, across multiple measurements and observations, and across studies by the same or different investigators;
- Be evaluated using experimental or quasi-experimental designs in which individuals, entities, programs, or activities are assigned to different conditions and with appropriate controls to evaluate the effects of the condition of interest, with a preference for random assignment experiments, or other designs to the extent that those designs contain within-condition or across-condition controls;
- Ensure that experimental studies are presented in sufficient detail and clarity to allow for replication or, at a minimum, offer the opportunity to build systematically on their findings; and
- Have been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review.

B-3. What evidence is critical in evaluating whether a body of research is scientifically based?

When reviewing research findings to determine whether they meet the criteria for scientifically based research, SEAs, LEAs, and schools should consider the extent to which the research meets each of the defined elements listed above. The following questions, as well as the information contained in Appendix C, will be helpful in evaluating research findings:

1. Systematic and empirical methods

- Does the research have a solid theoretical foundation?
- Were methodology, subject, and researcher clearly identified?
- Was the study conducted in a consistent, disciplined, and methodical manner?
- Were the data obtained using observation or experiment?
- Was the research grounded in data that are factual rather than opinion-based?
- Are the research findings supported by tangible, measurable evidence?

2. Rigorous data analyses

- Did the research test the stated hypotheses and justify the general conclusions drawn?
- Does the research report the sample size and the statistical procedures used?
- Were the data analyzed using methods that were appropriate for the task?
- Did the methods correspond to the nature and structure of the data?

- Did the research minimize alternative explanations for observed effects?
- Did the research findings present convincing documentation that the observed results were caused by the intervention?

3. Reliable and valid data collection

- Did the data result from a study involving multiple investigators in a number of locations?
- Were research biases minimized?
- Were the data measured consistently? Did repeated measurements on subjects taken under similar circumstances produce similar results?

4. Strong research design

- Does the design describe a random assignment experiment in which subjects are assigned to different conditions with appropriate controls?
- Do the controls allow for the evaluation of the condition(s) of interest?
- Was the study designed to optimize the investigator's ability to answer the research question?

5. Detailed results that allow for replication

- Are the findings clearly described and reported?
- Are the results of the research sufficiently detailed so that replication of the design is possible?
- Can the findings be enhanced with additional research?

6. Results subjected to scrutiny

- Has the research been accepted by a peer-reviewed journal or approved by a panel of independent experts?
- Has the research been reviewed by unbiased experts who were not a part of the research study?
- Have reviewers applied strict standards of scholarship and provided quality controls for the research they reviewed?
- Has the research been subjected to external verification?

B-4. The CSR legislation requires participating schools to develop a comprehensive reform program that has been found, through scientifically based research, to significantly improve the academic achievement of participating students; *or* has been found to have strong evidence that it will significantly improve the academic achievement of participating children. What is meant by “strong evidence”?

“Strong evidence” defines a less rigorous standard than scientifically research based evidence. Practices, strategies and programs that demonstrate “strong evidence” of positive effects lack a broad research base that meets the criteria established in the definition of scientifically based research. (See B-2). Strong evidence is derived from a combination of high quality and reasonably high-quality research studies that demonstrate relevance, significance and consistency. In the absence of scientifically based research on the effects of comprehensive reform programs, schools are required

to use the “strong evidence” standard by which to judge the quality of their programs. (See B-1 and Appendix C.)

B-5. What assurance must an SEA make regarding the research base of funded CSR programs?

An SEA must ensure that each funded comprehensive reform program employs proven strategies and methods for student learning, teaching, and school management that are based on scientifically based research and effective practices and have been replicated successfully in schools. The program developed must have been found, through scientifically based research, to significantly improve the academic achievement of participating students or must be supported by strong evidence that it will significantly improve the academic achievement of participating children. The SEA is responsible for ensuring that funded programs are grounded in scientifically based research, best practice, and sound professional judgment.

B-6. Must a comprehensive school reform program contain all eleven components listed in the legislation?

Yes. A comprehensive school reform program supported with CSR funds must coherently integrate all eleven components, and its comprehensiveness is reflected in their interrelationship. Thus, in designing its program, a school should exercise care that the models, methods, and strategies that it incorporates create a coherent whole. It is critical that the program employ strategies and methods for student learning, teaching, and school management that are based on scientifically based research and effective practices and that have been successfully replicated in schools.

The eleven components embody the essential elements of successful schoolwide reform. They encourage analysis, planning, and the implementation of reforms that touch every part of a school program and all students in the school. Both nationally available and locally developed models are likely to address some of the eleven components, but not all of them. Even if a school adopts an external model, it must incorporate that model into a comprehensive program that addresses all of the CSR components. CSR funds may not be used simply to support randomly adopted or developed strategies; instead, the strategies must be integrated in a comprehensive design for effective school functioning, and the program must be supported by scientifically based research or have strong evidence of success. (See B-1.)

B-7. Is an SEA responsible for ensuring that only comprehensive school reform programs are funded?

Yes. An SEA must ensure that CSR funds support only programs that address each of the eleven components described in the legislation and that funded CSR programs have the capacity to improve the achievement of participating students in core

academic subjects. (See Appendix B for additional information on gauging comprehensiveness.)

B-8. To receive CSR funds, must a school implement a comprehensive school reform program that includes an externally developed reform model?

No. CSR schools must implement a comprehensive school reform program that addresses eleven components important to the successful functioning of a school. The design must employ proven strategies and methods for student learning and teaching based on scientifically based research and effective practice. The strategies for addressing the eleven components, and the integrated design of the program, must be found, through scientifically based research, to significantly improve the academic achievement of participating students or must be supported by strong evidence that they will significantly improve the academic achievement of participating students.

Schools may choose to adopt a nationally available reform model or a locally developed model that supports one or more components of its comprehensive design. However, the model remains only part of the overall design and must be integrated with the required components. Implementing a model of any kind is not required.

C. FEDERAL AWARDS TO STATES

C-1. On what basis will the Department award CSR funds to SEAs?

The Department will award CSR grants on a formula basis to SEAs that submit an application containing the statutorily required information. The statute requires the Secretary to distribute Title I, Part F funds to SEAs according to each State's proportion of funds received the previous fiscal year under section 1124 of Title I. The Secretary must distribute the FIE portion on the basis of each State's relative share of the school-aged population, ages 5-17 inclusive.

C-2. Are the outlying areas and the Bureau of Indian Affairs eligible to receive CSR funds?

Yes. The Secretary is authorized to reserve up to one percent of the CSR funds appropriated for each fiscal year to provide assistance for schools in the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands and to the Bureau of Indian Affairs (BIA) for schools supported by the BIA.

C-3. When do CSR funds become available to the States?

In general, States can access CSR funds beginning on July 1 of each year in which funds are appropriated, as long as the Secretary has approved their initial application.

C-4. What happens to a State's allocation if it does not apply for CSR funds?

The Department anticipates that all States will participate in this program. However, if an SEA does not apply for CSR funds, the Secretary will reallocate those funds among other States that do apply. A State's failure to participate in the CSR program will not affect its receipt of other Federal resources.

C-5. Why do CSR allocations to States sometimes vary from year to year, even if the total amount appropriated for CSR stays the same?

Even if appropriations levels remain the same, it is possible for allocations to SEAs to vary from year to year. Title I, Part F funds are allocated on the basis of each State's proportion of funds received under Title I, Part A (section 1124) for the preceding school year, and FIE funds are allocated on the basis of a State's relative share of the school-aged population. Therefore, even if the total amount appropriated for CSR State grants remains constant from one year to the next, changes in a State's relative share of funds received under section 1124 of Title I or changes in a State's school-aged population will affect the State's CSR allocation.

C-6. If a State's CSR allocation increases from one fiscal year to another, how may the State use the additional CSR resources?

A State must provide each CSR school or consortium of small schools with a subgrant that is of sufficient size and scope to support the initial cost of implementing its comprehensive school reform program. This funding shall be provided annually for a three-year grant period, as long as the school or schools are making sufficient implementation progress. (See F-7.) States may not fund any site below the \$50,000 annual threshold. If a State has more than \$50,000 of CSR funds available after making required continuation awards, the Department encourages the State to fund additional sites.

A State may also use remaining funds to supplement CSR activities at current sites and is not required to hold a formal competition in order to distribute these additional funds to existing grantees. For example, a State could supplement continuation awards to existing CSR sites for activities that further strengthen their comprehensive program, such as increased professional development or the implementation of programs that strengthen instruction. States could also use the funds for enhanced State-level activities, so long as the State does not retain more than five percent of a given year's CSR allotment. (See E-1.)

C-7. If a State's CSR allocation decreases from one fiscal year to another, how can the State adjust its distribution of CSR funds?

There are various ways that an SEA can address this problem. For example, where possible, a State could decrease the amount that it retains for administration, evaluation, and technical assistance. Alternately, the SEA could reduce the amount of continuation awards to its CSR grantees, either on a pro-rata basis or by analyzing school needs and proposed budgets and adjusting awards accordingly. If necessary, a State could also accommodate the decrease by accessing funds from the following fiscal year's appropriation. In any case, a State cannot choose to fund sites below the required minimum of \$50,000 per year.

D. STATE APPLICATION REQUIREMENTS

D-1. How and when may an SEA submit its application for CSR funds?

A State may submit its application for CSR funds in one of two ways - (1) it may request CSR funds as part of the consolidated State application (ESEA, Section 9302); or (2) it may submit a separate CSR program application.

An SEA seeking CSR funds through a consolidated State application does not have to submit all of the information required in an individual CSR application, but will provide only “descriptions, information, assurances . . . and other materials that are absolutely necessary for the consideration of the consolidated State plan or consolidated State application” (ESEA section 9302(b)(3)). Applying for CSR funds through the consolidated State application process does *not*, however, relieve States or subgrantees of their obligation to comply with the CSR statutory requirements in implementing the program.

D-2. What key issues must an SEA address in applying for CSR funding?

States have the choice of applying for CSR funds through a consolidated State application or through a program-specific application. (See D-1.)

The individual State application for CSR funds must describe –

1. The subgrant process and selection criteria - The SEA must describe the process and selection criteria through which it will make competitive grants, using expert review, to eligible LEAs or consortia of LEAs. The SEA application should include, for example, any competitive preferences it establishes (see F-2

and F-3.) The SEA may wish to provide its draft LEA application or other draft guidance, if available.

2. Strategies to ensure quality - The SEA must describe how it will ensure that only high-quality, well-defined, and well-documented comprehensive school reform programs are funded. These programs must:

- coherently integrate all eleven components listed in question B-1;
- have the capacity to improve the academic achievement of all students in core academic subjects; and
- be supported by technical assistance providers that have a successful track record, financial stability, and the capacity to deliver high quality materials, professional development for school personnel, and on-site support during the full implementation period of the reform.

3. Dissemination strategies - The SEA must describe how it will disseminate materials and information on comprehensive school reforms that are based on scientifically based research and effective practices.

4. State evaluation strategies - The SEA must describe how it will annually evaluate the implementation of comprehensive school reforms supported under the program and measure the extent to which the reforms have resulted in increased academic achievement. In addressing this requirement, an SEA may submit a general description of its anticipated evaluation strategies, rather than a formal evaluation plan. CSR legislation requires that States annually submit to the Department a copy of their evaluation of the implementation of comprehensive school reforms supported and the student achievement results.

5. Technical assistance - The application must describe how the SEA will provide technical assistance to funded LEAs or consortia of LEAs, and to participating schools, in evaluating, developing, and implementing comprehensive school reform. (See H-1 and H-2.)

D-3. How will States ensure that technical assistance providers have a successful track record, financial stability, and the capacity to deliver high-quality materials, professional development, and implementation support?

This legislative requirement reflects the important role of external technical assistance providers in establishing and maintaining high-quality, well-defined, and well-documented comprehensive school reform programs. The Department encourages States to require that CSR technical assistance providers submit written evidence of their successful track record, financial stability, and their capacity to deliver high quality materials, professional development, and on-site support during the full implementation period of the reform.

E. FUNDS RESERVED FOR STATE USE

E-1. May an SEA reserve a portion of its allocation for State use?

Yes. An SEA may reserve up to five percent of its CSR allocation under Title I, Part F and up to five percent of its CSR allocation under FIE authority for administration, evaluation, and technical assistance. States must use the remaining funds for competitive grants to eligible LEAs or consortia of LEAs.

E-2. May an SEA combine CSR funds that are reserved for State activities and have been awarded under the separate CSR authorities?

Yes. An SEA may combine funds reserved under the two CSR authorities and need not track them separately. The funds may support administrative, evaluation, and technical assistance expenses related to any part of the State's CSR program.

E-3. May an SEA consolidate CSR administrative funds with those of other grant programs?

Consistent with the requirements in section 9201 of the ESEA, a State may consolidate funds made available for State administration under any ESEA program, as well as other programs that the Secretary may designate for administrative activities designed to enhance the effective and coordinated use of funds under those programs. In addition, a State may use the funds to develop the standards and assessments required under Part A of Title I.

E-4. May an SEA provide LEAs with funding for administration, evaluation, and technical assistance?

Yes. In its CSR application, an LEA may request funds for administrative expenses, evaluation, and technical assistance from the SEA. The State may grant these requests but is responsible for ensuring that the proposed LEA costs do not exceed amounts that are reasonable and necessary. LEAs may not subtract additional administrative funds from school-level CSR allocations. (See F-6, F-7 and F-16.)

E-5. May an SEA use CSR funds that it reserves to provide technical assistance to schools that have completed their three years of funding?

Yes. A State may choose to use its reserved funds to provide technical assistance to CSR LEAs and schools even after their funding period has ended.

F. STATE AWARDS TO LEAs

F-1. What entities are eligible to apply to an SEA for CSR funds?

LEAs and consortia of LEAs are eligible to apply to their SEA on a competitive basis as follows -

- **CSR funds appropriated under the Title I, Part F authority:** Only LEAs or consortia of LEAs with schools that are eligible for funds under Part A of Title I may apply for CSR funds appropriated under Title I, Part F. The funds must be used to support CSR activities in Title-I eligible schools.
- **CSR funds appropriated under the FIE authority:** Any LEA or consortium may apply for CSR funds appropriated under FIE authority, whether or not the schools that would receive support are eligible for Title I, Part A funds.

F-2. How does an LEA apply to its SEA for CSR funds?

Application options for LEAs applying for CSR funds are contingent upon the process their State uses to apply for CSR funds from the Department -

(a) If an SEA applies to the Department for CSR funds through use of a consolidated State application, it may –

- require its LEAs seeking CSR funds to apply as part of a consolidated local application; or
- permit its LEAs to apply using either an individual program application or as part of a consolidated local application.

However, the SEA may *not* require its LEAs to complete an individual program application when applying for CSR funds.

(b) If an SEA applies to the Department for CSR funds through an individual program application, it must –

- permit its LEAs to apply for a CSR subgrant through an individual program application or as part of a consolidated local application. (See section 9305 of the ESEA.)

F-3. What priorities and considerations must an SEA address in designing its LEA application?

In awarding competitive subgrants, the SEA must develop criteria for judging the quality of an applicant's comprehensive school reform proposal. The criteria should be designed to ensure that funded proposals are likely to be successfully implemented and improve the academic achievement of all students in core academic subjects in the participating schools. Strong applications will reflect the spirit and intent of the CSR legislation, which is to empower schools to design and implement their own comprehensive plan for improvement. This plan must address the eleven discrete components, each of which has a strong effect on school functioning, but do so in a manner that results in the whole being greater than the sum of its parts. The comprehensive integration of the components is crucial. (See B-1 and Appendix B.)

Required priority for subgrants under Part F of Title I:

In awarding subgrants under Title I, Part F, an SEA must give priority to LEAs or consortia that –

(1) plan to use CSR funds in schools identified as being in need of improvement or corrective action under section 1116(c) of the ESEA;
and

(2) demonstrate a commitment to assist these schools with budget allocation, professional development, and other strategies necessary to ensure that the comprehensive school reforms are properly implemented and sustained, such as providing assistance with school needs assessments and planning processes, decentralized decision making, or the reallocation of financial or other resources.

To meet this priority, an LEA or a consortium of LEAs must target schools that are in need of improvement or corrective action *and* must agree to assist those schools using the strategies necessary to ensure that their reforms are properly implemented. An SEA may comply with this legislative requirement by giving a competitive preference (i.e., additional points in a competition) to LEAs that submit proposals that meet both of the priority conditions.

Because of the strong and specific emphasis in the CSR legislation on assisting schools identified as in need of improvement or corrective action, an SEA may also establish an absolute priority that restricts all awards under Title I, Part F to LEAs that meet the priority conditions.

Considerations under either CSR authority

In awarding CSR subgrants under either authority, an SEA must also take into consideration the equitable distribution of subgrants to different geographic regions within the State, including urban and rural areas, and to schools serving elementary and secondary students.

F-4. May a State establish priorities in addition to those that are required?

A State may establish other priorities as a part of its overall school reform strategy and to further the purposes of the CSR program. For example, a State may give preference to applications that demonstrate an alignment with State or Federal reform priorities in core academic areas. Such priorities should be designed to give schools or programs a competitive edge in the subgrant selection process rather than entirely precluding non-priority programs or schools. For example, in awarding CSR funds, a State may give a competitive priority to schools at a particular grade level, such as elementary, middle, or high schools, but may not entirely exclude schools at other grade levels.

An SEA may also give a competitive preference to LEAs that would use funds appropriated under the FIE authority in Title I-eligible schools. Congress appropriated CSR funds under the FIE authority for the purpose of making other schools eligible for support; therefore, an SEA may not establish an absolute priority that would limit eligibility for FIE support to only Title I schools.

Because the legislation expressly permits their use, an SEA may not establish an absolute priority that prevents schools seeking to implement a locally developed model from receiving CSR support.

F-5. Do SEAs have flexibility regarding the timing of their subgrant competitions?

Yes. Fiscal year 2002 CSR funds will be available for obligation by an SEA or LEA through September 30, 2004. Accordingly, an SEA may decide to delay its competition until it believes that most eligible schools have had sufficient time to determine their needs and design their comprehensive school reform programs. However, this strategy provides LEAs with less time to obligate funds. An SEA could also run separate competitions, awarding a portion of its funds soon after the State receives them and reserving the remaining funds for LEAs with schools that need additional time to design a comprehensive program to meet their needs.

F-6. What key issues must an LEA address in applying for CSR funding?

Individual LEA applications for CSR funds must contain the following information -

1. Identification of the schools to be assisted and the costs of the program

The applicant must identify which of its eligible schools plan to implement a comprehensive school reform program and the projected costs of such a program.

Although LEAs or a consortium of LEAs may apply for CSR funds on behalf of one or more schools, the merit of each school's comprehensive design must be evaluated for funding independently of the others contained in the same application.

2. Description of the reform to be implemented

The applicant must describe the comprehensive school reform program that each eligible school would implement. The LEA must demonstrate that each school has woven scientifically based research, effective practice, and proven methods into an integrated, comprehensive program that addresses the eleven components described in B-1. Among other requirements, the program must employ proven strategies and methods for student learning, teaching, and school management that are based on scientifically based research and effective practices and have been replicated successfully in schools. In addition, the overall program must have been found, through scientifically based research, to significantly improve the academic achievement of students participating in such a program, or there must be strong evidence that the program will accomplish these results.

3. Description of LEA support

The LEA must describe how it will provide the technical assistance and support that is essential for the effective implementation of comprehensive school reform programs in its schools. (See H-4 and H-5.)

4. Evaluation strategies

The applicant must describe how it will evaluate the implementation of comprehensive school reform programs in its schools and measure the results achieved in improving student academic achievement for all students in participating schools.

5. Additional information

Each LEA application must also include the following:

- (a) the amount of CSR funding, if any, requested for LEA administration, technical assistance, and evaluation activities (in addition to that requested for school-level activities) and an explanation of how those funds will be used (See E-4, F-7, and F-16.);
- (b) a description of the steps the LEA proposes to take to overcome barriers to equitable program participation, as required under section 427 of the General Education Provisions Act;
- (c) the general assurances in section 9306 of the ESEA;
- (d) an assurance that CSR funds will be used only to supplement, and not supplant, Federal, State, and local funds a school would otherwise receive; and
- (e) the lower-tier certification covering lobbying and debarment/suspension under 34 CFR Parts 82 and 85.

F-7. What is the minimum amount of CSR funding that an SEA may provide to an LEA or consortium?

Each award that an SEA makes must be of sufficient size and scope to support the initial cost of implementing the comprehensive school reforms selected or developed by each school that receives assistance.

At a minimum, the SEA must award at least \$50,000 for each participating school, or for each participating consortium of small schools. The SEA must renew the initial award that an LEA or consortium receives for two additional one-year grant periods if the school or schools are making substantial progress in the implementation of their reform program.

An SEA may not simply provide all successful applicants with a minimum award of \$50,000 for each participating school if that amount is insufficient to enable each school to meet the purposes of the CSR program. In many instances, the amount of funding that a school will need to support the successful implementation of comprehensive school reforms will be greater than \$50,000 annually over the three-year funding period.

In addition to providing an LEA or a consortium of LEAs with funds to support school-level activities, the SEA may provide an LEA funds to support reasonable and necessary costs that an LEA may incur for administrative expenses, technical assistance, and evaluation activities. The LEA may not deduct funds to meet these expenses from a school's allocation. As a part of the application process, the LEA must provide an explanation of how those funds will be used. (See E-4, F-6, and F-16.)

F-8. What is a consortium of small schools?

The CSR legislation defines a consortium of small schools as one serving a total of not more than 500 students.

F-9. How does the legislative requirement for a minimum award of \$50,000 per school apply to a consortium of small schools?

If an SEA provides CSR support to a consortium of small schools, the \$50,000 annual minimum award applies to the consortium rather than to each school in the consortium.

An individual school that applies for and receives CSR funds through its LEA--regardless of its size--must receive at least \$50,000 annually for up to three years.

F-10. May a consortium of LEAs apply for CSR funds?

Yes. Consistent with the Education Department General Administrative Regulations (EDGAR) requirements, two or more LEAs may apply to their SEA as a consortium. To receive funds authorized under Title I, Part F, each LEA within the consortium must apply on behalf of schools that are eligible to receive funds under Title I, Part A and otherwise meet the funding criteria. An LEA consortium applying for funds made available under the FIE authority may use those funds to support comprehensive school reforms in both Title I-eligible and non Title I-eligible schools.

F-11. If a consortium of LEAs is funded, must each participating school within the consortium receive a minimum award of \$50,000 annually?

The SEA must award at least \$50,000 annually to each school in an LEA consortium unless the consortium is applying on behalf of small schools and the total number of students served by the consortium does not exceed 500 students. (See F-8 and F-9.)

F-12. May an SEA award funds to some, but not all, of the schools that an LEA or consortium of LEAs has included in its CSR application?

Yes. Although an SEA may choose to fund all of the schools for which an LEA or consortium of LEAs has requested funds, it may also decide to fund some and not others. The SEA must independently evaluate the quality of each school's comprehensive reform proposal and its likelihood of success.

F-13. May an SEA use CSR funds to support planning activities in schools that have not yet designed their comprehensive reform program?

No. CSR funds are intended to assist schools that have already undergone the planning necessary for successful implementation of a comprehensive school reform program. An LEA's application for CSR funds must describe, among other things, the comprehensive school reforms based on scientifically based research and effective practices that the schools will implement. A CSR-funded school may, however, use its funds to enhance and strengthen the various components of its program or to better integrate those components.

F-14. Should CSR funds be used to support schools that are already implementing a comprehensive school reform program?

No. Schools already engaged in comprehensive reform may not receive CSR funds. CSR funds support schools that have completed all of the required preliminary steps and are ready to begin implementing a comprehensive school reform program. Schools that have previously engaged in only piecemeal attempts at reform—e.g.,

rewriting curriculum or increasing professional development—without integrating those strategies into a comprehensive design, but are now ready to take a whole-school approach, are eligible for CSR funds. (See G-1.)

F-15. If an LEA submits virtually identical applications to an SEA on behalf of different schools, should the SEA consider such proposals for funding?

LEAs are responsible for ensuring that each school develops a unique program, based on each school's needs assessment, an analysis of those needs, and the goals developed as a result of that analysis. The eleven CSR components must be integrated and addressed coherently. A "one size fits all" proposal is not likely to address adequately the individual needs of each qualifying school. SEAs must evaluate the merit of each school's comprehensive design independently of any others contained in the same application.

F-16. May an LEA or consortium use CSR funds to cover administrative costs, technical assistance, and evaluation activities?

LEAs and consortia that receive CSR support must receive awards that are of sufficient size and scope to support the initial costs of implementing CSR activities in the participating schools. The award may not be less than \$50,000 annually for each participating school, with the exception of a consortium of small schools, which may receive the \$50,000 minimum for the consortium as a whole. An LEA may not deduct from these award amounts funds for administrative costs, technical assistance, or evaluation.

SEAs may provide LEAs with additional CSR funding (i.e., funding beyond the amounts referenced in the preceding paragraph) to support reasonable and necessary expenses for administration, technical assistance, and evaluation activities. (See E-4 and F-6, and F-7.)

F-17. Are public charter schools eligible to participate in the CSR program?

If a charter school is an LEA, it may apply to the State for CSR funds on the same basis as other LEAs in the State. (See F-1.) If a charter school is not an LEA, it may receive support only through an LEA that applies on its behalf.

F-18. What are the implications for CSR awards of the charter school provisions in section 5206 of the reauthorized ESEA?

Section 5206 of the ESEA requires that public charter schools be permitted to compete for CSR funds on an equal footing with other public schools and LEAs. States may not create competitive preferences or absolute priorities for the purpose of excluding charter schools from competing for CSR funds and may not discriminate

against these schools in awarding funds simply because of their charter school status. States and districts should use a clearly defined process and criteria to determine which schools--including charter schools and other public schools--are most deserving of CSR support. The criteria should distinguish among CSR applicants on the basis of a particular school's need for reform and the quality of the proposed program.

F-19. Are private school children eligible to participate in the CSR program?

No. There is no provision in the CSR legislation for providing services to private school children. The CSR program is specifically designed to stimulate comprehensive reform of a school's entire operation. Generally, services for private school children under Federal education programs must be provided by employees who are under public supervision and control, and must benefit private school children and their teachers directly, not the private school in general.

F-20. Are Bureau of Indian Affairs (BIA)-funded schools eligible to compete for CSR funds?

Yes. The Department allocates CSR funds each year to the Bureau of Indian Affairs (BIA). The BIA then makes competitive subgrants to BIA-funded schools. BIA-funded schools that meet the definition of an LEA as defined in section 9101(26) of the ESEA are also eligible to apply to the State for CSR funds. However, although these schools may participate in both the BIA and SEA competitions, they may not receive CSR funds from both sources.

F-21. On what basis does an SEA award continuation funding to subgrantees?

The decision to continue CSR funding beyond the initial year is based on the SEA's determination that the participating school has made substantial progress in the implementation of reforms. The Department strongly recommends that a State fund continuation awards only after it has determined that schools have made progress in implementing their CSR plans and achieving their benchmarks. Possible indicators of implementation progress include measures of the school staff's awareness of and involvement in the reform; the amount and quality of professional development; or the degree to which the reform plan is being implemented in every classroom. SEAs should develop clear and consistent criteria by which they make this determination.

F-22. If an SEA determines that a CSR school is not making substantial implementation progress, what becomes of the school's subgrant funds?

If an SEA determines that a school is not making substantial progress and decides not to award the school a second or third year of its subgrant, the SEA must use the funds to establish new CSR programs (if the SEA can fund these new programs for a full three years) or to support comprehensive school reform activities at other existing CSR sites.

G. LOCAL USE OF FUNDS

G-1. For which of its schools may an LEA apply for CSR funds?

CSR funds awarded to an LEA under Title I, Part F may be used only in schools that are eligible for assistance under Title I, Part A. Funds awarded under the FIE authority may be used for comprehensive school reform programs in any school, whether or not it is eligible for Title I, Part A assistance.

G-2. For what activities may a school use CSR funds?

A school may use CSR funds to support the costs associated with implementing the reform program it has designed, and SEAs and LEAs should work with schools to ensure that they implement a coherent set of activities that incorporates the eleven components of the legislation.

However, CSR funds are not intended to support fully all aspects of a school's reform efforts. Rather, in implementing comprehensive reforms, a school must determine how all available Federal, State, local and private resources can be used to coordinate services that will support and sustain comprehensive reform efforts. Thus, schools with comprehensive school reform programs must, from their inception, consider how those programs will be maintained after CSR funding expires.

G-3. May a school apply for additional funding through a new competition after receiving funds for three years?

No. The Comprehensive School Reform program operates on the premise that three years of funding is sufficient to launch a well-prepared school in its reform efforts. If a school is clear about its needs when it receives CSR funds and has designed a comprehensive program to address them, the three-year funding period allows time for strengthening infrastructures and aligning and reallocating resources. By the end of three years of CSR funding, schools should have made significant progress in institutionalizing reform and are no longer eligible for CSR start-up funds.

G-4. Must CSR funds be used to supplement other Federal, State, and local funds?

Yes. CSR funds must supplement, and not supplant, funds that LEAs and schools otherwise receive. Unlike most provisions that address this issue, the CSR supplanting prohibition applies to Federal funds as well as State and local funds. An SEA or LEA may not decrease the resources that would otherwise be available from Federal, State, or local sources because that school is receiving CSR funds.

G-5. How long are CSR funds available for obligation by SEAs and LEAs?

SEAs and LEAs can initially obligate CSR funds from the time they become available through September 30 of the following fiscal year, a fifteen-month period. If unobligated funds remain after this initial period of availability, the Tydings Amendment provides SEAs and LEAs with an additional twelve-month period to obligate the funds. For example, CSR funds that become available on July 1, 2002 remain available for obligation through September 30, 2004.

G-6. What constitutes an obligation of funds?

SEAs and LEAs must obligate CSR funds during the period of fund availability. An SEA's awarding of a subgrant does not constitute an obligation. Funds are obligated only when they are committed to specific activities.

The Department's regulations at 34 CFR 76.707 describe when an obligation occurs with respect to various categories of activities:

§76.707 of the Education Department's General Administrative Regulations (EDGAR) When Obligations Are Made	
If the obligation is for --	The obligation is made-
(a) Acquisition of real or personal property	On the date on which the State or subgrantee makes a binding written commitment to acquire the property
(b) Personal services by an employee of the State or subgrantee	When the services are performed
(c) Personal services by a contractor who is not an employee of the State or subgrantee	On the date on which the State or subgrantee makes a binding written commitment to obtain the services
(d) Performance of work other than personal service	On the date on which the State or subgrantee makes a binding written commitment to obtain the work
(e) Public utility services	When the State or subgrantee receives the

	services
(f) Travel	When the travel is taken
(g) Rental of real or personal property	When the State or subgrantee uses the property
(h) A preagreement cost that was properly approved by the State under the cost principles identified in 34 CFR 74.171 and 80.22	On the first day of the subgrant period

G-7. What is the appropriate LEA subgrant period for CSR awards?

CSR legislation identifies no specific initial subgrant period for LEAs; each SEA defines its own award period, consistent with its regulations. In general, SEAs should make the initial grant period long enough to give schools time to obligate CSR funds in a timely, yet responsible, way. It is also important that LEAs and schools have sufficient time to complete their necessary planning and prepare comprehensive reform designs before applying for CSR funding.

G-8. May pre-award costs be charged to the CSR grant?

The legitimacy of charging costs to the CSR grant depends on when the charges are incurred. If a school incurs costs related to its CSR program after being notified that it will receive CSR support, but before the subgrant has been awarded, CSR funds may absorb these costs, assuming that they are allowable expenses. The SEA must provide written approval of this use of funds.

However, if costs are incurred before the school is notified that it will receive CSR support, those costs may not be charged to CSR. They must be viewed as costs that would have incurred whether or not the grant was awarded. Using CSR funds to pay for these costs would violate the supplanting prohibition that applies to CSR funds.

G-9. Can an SEA permit an LEA to carry over unobligated CSR funds from one year to the next?

Yes. If a school fails to use its entire grant award within the initial grant period, an SEA may permit the LEA to carry over the unobligated CSR funds and to use those funds through the end of the Tydings period of fund availability. (See G-5.) Alternately, the SEA may redistribute the unobligated funds to support activities at other CSR sites. If a CSR school is making substantial progress in reform implementation, an SEA must not reduce the school’s award below the minimum amount needed to support the initial costs of comprehensive school reforms. As stated previously, this minimum award amount may not be less than \$50,000 annually for three years. (See F-6.)

G-10. May a school that is in the early planning stages of comprehensive reform and has not yet completed the design of its comprehensive reform program receive CSR support to continue this planning?

No. CSR funds are intended to support the implementation of comprehensive school reform programs, not the prior planning that is needed to create them. In order to apply for a CSR grant, a school must complete an in-depth needs assessment and analysis and design a comprehensive school reform program for schoolwide change.

G-11. May a school that has already begun to implement a reform program with other Federal, State and local funds receive CSR support?

The purpose of the CSR legislation is to stimulate schoolwide change in schools that need to substantially improve student achievement, particularly Title I schools. If such a school has made some attempts at reform, but those improvements are not comprehensive and are isolated from each other, then CSR funds could provide the incentive needed to take that school from partial reform to whole school reform. However, before an LEA applies for CSR funding on behalf of such a school, the school must create a comprehensive program that addresses the eleven components required by the CSR legislation. In short, the school must be committed to whole school reform, and must have created an implementation design to achieve it before it can be eligible for a CSR grant.

G-12. May a school use CSR funds to pay or reimburse a proposal-writing firm for developing a school's application?

No. LEAs and schools may not use CSR funds to cover the cost of proposal development, nor may they reimburse themselves for those costs after they receive a CSR award. CSR funds may be used only for necessary and reasonable costs in operating the CSR program.

G-13. Can a Title I targeted assistance school make effective use of CSR funds?

When a targeted assistance school participates in comprehensive school reform, its Title I, Part A funds must still be used in accordance with the Title I, Part A requirements--i.e. for supplemental activities for eligible children in greatest need of assistance.

This limitation, however, should not interfere with a school's ability to implement comprehensive school reform using CSR funds and other resources. The learning activities in CSR schools that are funded by Title I, Part A to address the needs of the

school's eligible children can be integrated into a comprehensive program that is designed to bring all students to high standards.

G-14. If a school that has received CSR funding determines, in consultation with its LEA, that it needs to make major revisions to its whole school reform program, can this school continue to receive CSR funds?

When applying for CSR funds, the school's primary goal must be to help all children meet challenging State academic content and achievement standards. By working with their LEAs and external technical assistance providers, and by completing the essential preparation work prior to applying for funds, most schools will make satisfactory progress in implementing comprehensive reforms and see positive results. Careful monitoring of implementation will help CSR schools and their districts to identify problems early on and seek solutions.

If the plans and strategies initially proposed fail to meet expectations, the school and its LEA should analyze the causes of the deficiencies, correct the problems, and, with the permission of the SEA, adjust the original plan. The SEA should review the school's new proposal, applying the same competitive criteria applied to other applications during the sub-granting process. SEAs must determine if the school's alternative program is truly comprehensive, shows strong evidence that it will significantly improve the academic achievement of participating children, and that it meets all of the other CSR legislative requirements before it can make a decision about continued funding.

G-15. May a school that failed to make substantial progress and did not receive three years of funding reapply to receive CSR funds?

If a school fails to make sufficient progress in reform implementation, the SEA discontinues its CSR funding. If the school reevaluates its needs assessment, reassesses its strategies, and increases its internal capacity to undergo schoolwide, comprehensive reform, it may reapply for CSR funding through its LEA. The State should consider the quality and comprehensiveness of this school's application as it does other subgrant proposals.

G-16. To what extent may waivers be sought to facilitate the implementation of a school's comprehensive school reform plan?

Consistent with waiver provisions as outlined in section 9401 of the ESEA, a school that receives CSR funds may apply for waivers of requirements of the CSR legislation and of other major Federal education program legislation if those requirements impede the school's ability to carry out its comprehensive school reform program.

A school in an Ed-Flex State would apply directly to its SEA for a waiver. A school in a non-Ed-Flex State would apply for a waiver, through its LEA, to the Department.

H. TECHNICAL ASSISTANCE

H-1. What is the role of the SEA in providing technical assistance to LEAs and schools regarding comprehensive school reform?

In its application for funds, each SEA must describe how it will provide technical assistance to LEAs and consortia of LEAs, and to participating schools, in developing, implementing, and evaluating comprehensive school reform.

This assistance could include workshops on comprehensive needs assessment and planning during a school's or LEA's reform development stage. During implementation, assistance could include advising on flexibility provisions or providing information on state standards and assessments. SEAs can also help LEAs design their required evaluation of the implementation of comprehensive school reforms to measure the results achieved in improving student academic achievement.

H-2. What commitment must the SEA make regarding technical assistance for funded comprehensive school reform programs?

Each SEA must ensure that the comprehensive reform programs it funds are supported by technical assistance providers that have a successful track record, financial stability, and the capacity to deliver high-quality materials, professional development for school personnel and on-site support during the full implementation period of the reforms.

H-3. Must States give priority to an LEA or a consortium of LEAs that supports the reform efforts of its schools?

SEAs must give priority to an LEA or to a consortium of LEAs that plan to use CSR funds in schools identified as being in need of improvement or corrective action under Title I, Part A *and* demonstrate a commitment to assist those identified schools with budget allocation, professional development, and other strategies necessary to ensure the comprehensive school reforms are properly implemented and are sustained in the future. (See F-3.)

H-4. What commitment must an LEA or a consortium of LEAs make regarding technical assistance to CSR schools?

In applying for CSR funding on behalf of one or more schools, an LEA or consortium of LEAs must describe how it will provide technical assistance and support for the effective implementation of the comprehensive school reforms based on scientifically based research and effective practices selected by those schools.

H-5. What kind of technical assistance can LEAs provide to their CSR schools?

LEAs are in a unique position to provide assistance to their schools implementing comprehensive reform. Because of their control of district infrastructures, policies, and procedures, LEAs can participate in reform efforts by providing both guidance and flexibility. They can align district-arranged professional development with school reform initiatives. LEAs can also provide practical assistance with budgeting and resource reallocation. In addition, school districts can sometimes waive non-essential district requirements and allow schools to modify some procedures. CSR funds provide financial incentives for reform, but only with substantive support at the district level can schools sustain those initiatives.

H-6. Does technical assistance provided by an LEA constitute the "external support" required for participating schools?

No. LEAs have certain responsibilities for providing participating schools with technical assistance and support in the implementation of their comprehensive school reform programs, but that technical assistance does not fulfill the CSR requirement for external support.

H-7. How must a school address the technical assistance component of its CSR program?

Schools awarded CSR funds must use high-quality external technical support and assistance from an entity that has experience and expertise in schoolwide reform and improvement, which may include an institution of higher education.

The inclusion of this component in the CSR legislation reinforces the importance of assistance and outside guidance in implementing lasting reform. The perspective provided by qualified external assistance providers is invaluable in keeping school reforms on track. They provide a wide range of resources and experience, helping schools to avoid reform pitfalls and setbacks and to deal with them effectively when they do occur.

As comprehensive reform planning becomes comprehensive reform implementation, it is crucial that schools stay on track with their reform programs, and credible and informed technical assistance providers are essential to this process. These technical

assistance providers must deliver timely, high-quality professional development and needed follow-up. Consultations and site visits are essential.

As a part of their comprehensive school reform program, some schools choose to align with a national model provider to attain such expertise. Others choose to contract with regional educational laboratories or comprehensive assistance centers, or develop a university partnership, although none of these entities must be chosen.

Each school must find the “right fit” when determining its technical assistance provider. The provider must have a deep understanding of the school’s unique needs and goals and possess the expertise needed to help the school address them. Foremost among the concerns of the technical assistance providers must be the maintenance of the comprehensive nature of the school’s reforms. Technical assistance cannot focus solely on one or two elements of a school’s design, but must guarantee that all areas of the school’s program are addressed.

I. ACCOUNTABILITY PROVISIONS

I-1. What evaluation requirements apply to SEAs with CSR programs?

CSR legislation requires SEAs to describe how they will annually evaluate the implementation of comprehensive reforms and measure the extent to which the reforms have resulted in increased student academic achievement.

I-2. What elements of their CSR programs must an LEA evaluate?

LEAs must measure the results achieved in improving student academic achievement, and they must evaluate the implementation of comprehensive school reform programs.

I-3. What should an SEA and LEA consider in designing the evaluation of their CSR programs?

The CSR evaluation requirement is intended primarily to inform SEAs and LEAs about how effective their schools have been in improving student achievement using comprehensive reform strategies. They should use the results of these evaluations to improve programs in schools with poor performance and should share the successes of schools with high performance.

SEAs and LEAs must evaluate both the implementation of comprehensive school reform programs and the student achievement results:

Student achievement data: A comprehensive school reform program must include measurable goals for student academic achievement. Using valid and reliable measures, SEAs and LEAs should track student achievement in CSR schools using the same assessment data that are being used under Title I, Part A to measure the progress of all students in achieving challenging State standards (section 1116).

Evaluation measures can compare student achievement in CSR schools with achievement at the same schools before the reforms began to be implemented; student achievement at CSR schools with achievement at other district schools with similar characteristics; and CSR-school achievement with State achievement standards.

In order to assess the impact of reform on targeted groups, evaluators should disaggregate achievement data using the same disaggregation categories the State will use to determine adequate yearly progress (AYP) under section 1111(b)(2) of the reauthorized ESEA.

SEAs and LEAs may also wish to monitor the extent to which comprehensive school reform programs have affected other indicators of school performance such as attendance, grade promotion, graduation, suspension and expulsion rates, course-taking patterns, and parental involvement.

- **Program implementation data:** Although implementation data cannot substitute for achievement data, research has consistently shown that fidelity of implementation is a powerful factor in the success of school reform programs. Comprehensive reforms can succeed if they are implemented well, with particular attention focused on initial activities and long-term sustainability. Quality-of-implementation indicators include measures of stakeholder support, parent participation, ongoing professional development, and student academic performance. SEAs and LEAs should also consider gathering information on the nature and extent of external technical assistance provided to schools in implementing their program, the source of that technical assistance, and the school staff's perception of its usefulness. Monitoring these indicators can provide helpful data in designing ongoing strategies to sustain reform.

SEAs can use this evaluation data to make determinations about their CSR schools. They can identify schools in need of additional support and make decisions about whether or not CSR schools should receive continuation funding.

I-4. What requirements for reporting apply to SEAs with CSR programs?

SEAs must report to the Department the names of the LEAs and schools that received CSR grants; the amount of funding they received; and a description of the comprehensive school reforms used by those schools. In addition, SEAs must submit a copy of their annual evaluation of the implementation of comprehensive school reforms and the student achievement results to the Department.