



**Comments to United States Department of Education  
Notice of Proposed Requirements for School Improvement Grants  
Docket ID ED–2009–OESE–0010**

*Submitted by:  
Center for Law & Social Policy and Campaign for Youth*

Thank you for the opportunity to submit comments on the Department of Education’s Notice of Proposed Requirements for School Improvement Grants. We greatly appreciate the Administration’s recognition that investments in education are vital to the future of our economic viability. Resources through *School Improvement Grants* offer our nation’s most challenged school districts an opportunity to utilize best practices to rethink time and learning and provide our children and youth with a first-rate education experience.

We applaud the Secretary’s sustained commitment to advance innovation and reform in education and target much-needed resources to those schools and districts that are in highest need. The rigorous interventions included in the *School Improvement Grants Notice* will not only raise the bar for the nation’s lowest performing schools but it will provide state education agencies (SEAs) and local education agencies (LEAs) with the tools, strategies, and resources to effectively turn schools around and support our most disadvantaged students.

The following comments and recommendations relate specifically to giving increased attention to struggling students and disconnected youth:

**Tier II Schools – Priority Given to Secondary Schools**

We strongly support the prioritization of low-achieving secondary schools that are eligible for, but do not receive, Title I, Part A funds. Far too many middle school and high school students are facing educational odds in low-achieving schools that place their futures at risk. With close to 2,000 high schools nationwide that fail to graduate half of their students, intervention at the secondary level is a fundamental imperative. Characterizing these schools as “greatest need” and requiring SEAs to give priority to LEAs which commit to serve both Tier I and Tier II schools will stimulate successful school improvement work at all grade levels.

**We recommend the following:**

Maintain the three-tier definition of “greatest need” and its requirement that funding priority be given to LEAs who commit to serving their Tier I and Tier II schools through the implementation of rigorous interventions.

**Ensuring Education Options for Struggling and Reconnecting Students**

The recovery of high school dropouts must be a central component to any serious systemic approach to education reform. One in three youth—and more than 50 percent of minority youth and youth in high poverty urban and rural communities—who start high school will not graduate four years later.<sup>i</sup> Intentional recovery options and systems of support, especially those in communities of high youth distress, are particularly important as state and local school districts move toward increasing graduation rates and preparing increasing numbers of students for post-secondary and career success. With seventy-five percent of U.S. jobs created between now and 2014 requiring some type of postsecondary credential<sup>ii</sup>, keeping students on track to graduate and re-engaging those that have dropped out is essential to the future survival of the American economy.

**We recommend the following:**

**Transformational Model(I)(A)(2)(d)**

We urge the Secretary to **maintain** the required strategies within the transformational model, and in particular, we strongly support the inclusion of specific secondary school strategies, extending learning time, and partnering with community-based supports.

To strengthen the ability of LEAs to effectively serve “high risk” and reconnecting students, those that have left secondary school without a diploma, we urge the Secretary to include the following amendments:

- (I)(A)(2)(d)(ii)(B)(3)(a) **Edit** statement to include language around reconnecting dropouts. “...*including by providing appropriate supports designed to ensure that low-achieving students and **those students that have dropped out** can take advantage of these programs and coursework;*
- (I)(A)(2)(d)(ii)(B)(3)(c) **Edit** statement to include language that specifies re-engagement of high school dropouts. “*Increasing graduation rates through, for example, **pathways specifically designed for over-age, under-credited, and re-enrolling students**, including credit-recovery programs, smaller learning communities, and acceleration of basic reading and mathematics skills.*

- (I)(A)(2)(d)(ii)(B)(3) **Add** a statement explicitly supporting credit based on student performance. ***“(d) Creating new pathways to high school graduation by establishing credit based on student performance rather than instructional time.”***

We applaud the Secretary’s recognition that school climate and disciplinary processes are an integral part of school quality and reform efforts. Time spent involuntarily out of the school building (i.e. out-of-school suspensions and expulsions) due to behavioral infractions or other issues is, generally, an ineffective means of handling school disciplinary issues and contributes to a loss of educational opportunities and eventual school dropout<sup>iii</sup>. We, therefore, urge the Secretary to include the following amendment:

- (I)(A)(2)(d)(iii)(B)(3) **Edit** statement to include specific language about out-of-school suspensions and expulsions. ***“Implementing approaches to improve school climate and discipline, such as implementing a system of positive behavioral supports, taking steps to eliminate bullying and student harassment, or taking steps to reduce out-of-school suspensions and expulsions.”***

#### Restart Model (I)(A)(2)(b)

We urge the Secretary to **encourage** LEAs consider the Restart Model strategy as a means of developing new school options for high risk students and dropouts seeking to reconnect to educational options. There is growing evidence that public charter schools allow flexibility and innovation in education that can make for a successful learning environment for students.<sup>iv</sup> These settings provide struggling students and former dropouts with environments that meet their unique needs by integrating practices such as individual learning, wrap-around social services, non-traditional teaching to support learning styles, and work-based skills and techniques. We urge the Secretary to include the following amendments:

- (I)(A)(2)(b) Add a statement to reflect this option for LEAs. ***“In secondary schools, LEAs are encouraged to consider this option to create high quality pathways for high risk students and dropouts seeking to reconnect to school.”***

Thank you for your consideration of our recommendations. If you have any questions or need further information, please contact Rhonda Tsoi-A-Fatt at CLASP (202-906-8014 or [rtsoiafatt@clasp.org](mailto:rtsoiafatt@clasp.org)) or Kisha Bird at the Campaign for Youth (202-906-8020 or [campaignforyouth@clasp.org](mailto:campaignforyouth@clasp.org)).

## ENDNOTES

<sup>i</sup>Gary Orfield, Daniel Losen, Joanna Wald, and Christopher Swanson, *Losing Our Future: How Minority Youths are Being Left Behind by the Graduation Rate Crisis*, The Civil Rights Project at Harvard University, 2004, 2.

<sup>ii</sup> Louis Soares, “A Postsecondary Degree or Credential in Every Pot”, Center for American Progress Web site, February 26, 2009, [http://www.americanprogress.org/issues/2009/02/obama\\_ed\\_credential.html](http://www.americanprogress.org/issues/2009/02/obama_ed_credential.html)

<sup>iii</sup>Daniel Janerette & Barbara Shepperson, “Zero Tolerance Policies and School Discipline,” *Delaware Education Research and Development Center* 28 (2009): 1-6, <http://dspace.udel.edu:8080/dspace/bitstream/19716/3930/1/Zero%20Tolerance-%20Education%20Policy%20Brief%20January%202009.pdf>

<sup>iv</sup>Nancy Martin and Betsy Brand, *Federal, State, and Local Roles Supporting Alternative Education*, American Youth Policy Forum, June 2006, [http://www.doleta.gov/youth\\_services/pdf/AE\\_Current\\_Policy\\_and\\_Funding\\_Environment.pdf](http://www.doleta.gov/youth_services/pdf/AE_Current_Policy_and_Funding_Environment.pdf)

### ***ABOUT CLASP***

The Center for Law and Social Policy (CLASP) is a national nonprofit that develops and advocates for policies at the federal, state, and local levels to improve the lives of low-income people.

### ***ABOUT CAMPAIGN FOR YOUTH***

Housed at the Center for Law and Social Policy, the Campaign for Youth is an alliance of national and local youth-serving organizations who are concerned about the challenges confronting more than 5 million young people in this nation who are disconnected from education, employment and opportunity. For more information on the Campaign for Youth and the partnering organizations, please visit [www.campaignforyouth.org](http://www.campaignforyouth.org)