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AUTHOR Turnbull, Brenda J.; And Others
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ABSTRACT

A study was done of the state level perspective on Chapter 1 program implementation under the 1988 amendments to the Elementary and Secondary School Improvement Act. In 1991-92, the study surveyed 50 out of 53 Chapter 1 coordinators in state education agencies (SEAs) whose offices are responsible for communicating the law's provisions to school districts and for overseeing program implementation. The amendments to the legislation were designed to make Chapter 1 a more effective vehicle for high-quality instruction. The survey's findings suggest that changes are not dramatic, although the SEAs and school districts are faithfully implementing the law's requirements. In particular, the changes have fallen short of stimulating major efforts to make Chapter 1 schools more effective. In the area of improved involvement of parents and other stakeholders, there has been steady change for the better. Results also indicate that despite an 11 percent increase in staffing levels since 1989-90, there continue to be difficulties in the effort to get everything done; and that reasons for falling short of stimulating major change may be the law's procedural requirements and SEAs' inability to carry out major leadership initiatives. Five figures and 35 tables illustrate the report. (JB)

CHAPTER 1 UNDER THE 1988 AMENDMENTS: IMPLEMENTATION FROM THE STATE VANTAGE POINT

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POLICY STUDIES ASSOCIATES, INC.
1718 CONNECTICUT AVENUE, N. W. · SUITE 400 · WASHINGTON, D. C. 20009 · (202) 939-9780

CHAPTER 1 UNDER THE 1988 AMENDMENTS: IMPLEMENTATION FROM THE STATE VANTAGE POINT

Brenda J. Turnbull
Marjorie E. Wechsler
Eric D. Rosenthal

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EXECUTIVE SUMMARY

The Augustus F. Hawkins - Robert T. Stafford Elementary and Secondary School Improvement Act of 1988 was intended to stimulate far-reaching changes in the Chapter 1 program through accountability, broader participation, and other educational reforms. The program, authorized under Chapter 1 of Title I of the Elementary and Secondary Education Act, supports supplemental educational services for low-achieving students in relatively high-poverty schools. With the next reauthorization of Chapter 1 scheduled for 1993, the 1991-92 school year offers an almost-final opportunity to gauge the effects of the amendments on the program's operations. This report presents findings of a 1991-92 survey of Chapter 1 coordinators in state education agencies (SEAs), whose offices are responsible for communicating the law's provisions to school districts and for overseeing program implementation.

The innovative features of the Hawkins-Stafford Amendments, drawing on themes from recent movements in school reform, were intended to make Chapter 1 a more effective vehicle for high-quality instruction. The new law mandated accountability for student outcomes, requiring that schools in which Chapter 1 participants do not make gains in achievement must take steps to improve their performance. It expanded the scope of expected student outcomes beyond basic skills to include more advanced academic skills. It bolstered the provisions for involving parents in their children's educational programs and added a mechanism for local participation in state policy decisions. It required coordination between Chapter 1 and other instructional programs and permitted very high-poverty schools, under certain conditions, to use Chapter 1 funds throughout the school rather than for a distinct supplemental program.

Looking at these and other provisions, one might expect a transformation in Chapter 1 programs. This survey's findings suggest, however, that the changes are not dramatic, although SEAs and school districts are, for the most part, faithfully implementing the law's requirements. This report discusses the changes observed from the vantage point of the SEA program administrators and advances some possible explanations for the modest scope of the changes.

Program Improvement and Accountability

The law's provisions for program improvement have fallen short of stimulating major efforts to make Chapter 1 schools more effective. Even though considerable energy has gone into setting standards, meeting standards, and identifying schools for improvement, more than half of the SEAs identify schools for improvement only when Chapter 1 students' achievement gains are below a very low standard set in the statute. These SEAs are identifying fewer schools as in need of improvement than the SEAs that have set a higher achievement standard.

More important, state and local attention to standard setting seems to have greatly outstripped attention to actual school improvement. For example, few Chapter 1 schools are subject to mandatory implementation of an improvement plan, since few sustain a record of low student performance over two years. In other words, a school can escape its designation for improvement with little effort. Moreover, although it is possible that some school districts are pouring resources into some of their improvement plans, the special resources that SEAs provide for improvement, in the form of funding and technical assistance, can only be described as minimal: a typical school identified for improvement receives a tiny grant for planning or implementation; a school carrying out a joint state-local plan is visited by SEA staff members for only two or three days a year. This is especially worrisome because the SEAs describe themselves as a key resource for the schools identified as in need of improvement.

- SEAs report that 6,657 schools were identified as in need of improvement on the basis of data from 1989-90, representing about 13 percent of Chapter 1 schools in the reporting states. This figure is 31 percent higher than the number identified in the previous year.

- Coordinators estimate that, on average, 50 percent of identified schools test out of program improvement before carrying out their plans.

- All told, coordinators report that 6,439 schools are implementing plans for program improvement in 1991-92; they represent 14 percent of all Chapter 1 schools in the reporting states.

- The schools identified for joint state-local improvement plans as of 1991-92 number 1,519 in 43 states. Of these, 1,027 in 22 states are reported to be fully implementing joint plans this year.

- A higher standard for aggregate achievement is associated with more schools being subject to improvement; the 23 SEAs that now use a standard above the statutory minimum report that 20 percent of their Chapter 1 schools are implementing plans, and the 10 that have used a higher standard in both 1989-90 and 1991-92 report that 28 percent are implementing plans. However, SEA policies on other desired outcomes show little relationship to the percentage of schools subject to improvements.

- Planning for improvement tends to be a bigger local concern than actually carrying out plans; 29 SEAs report that there is major local concern with the development of plans, but fewer than half--20 SEAs--perceive major concern with the implementation of plans.

- The Section 1405 funds for program improvement have a median size of $2,500 per school identified as in need of improvement.

- SEAs estimate that their staff members will spend a median of two or three days in each school implementing a joint plan this year. Other features that distinguish joint plans from local plans, according to SEAs, are more intensive needs assessment (reported in 27 of 38 states) and more help from Chapter 1 Technical Assistance Centers and Rural Technical Assistance Centers (23 states); in only 12 of 38 states do these plans tend to take a significantly different educational approach, and in only four states do the schools commonly receive extra funds from the basic Chapter 1 grant.

- The most frequent SEA suggestions for working with students who have not made progress after two years of Chapter 1 participation are to provide more intensive Chapter 1 services (37 SEAs), to modify the regular instructional program (35), or to consider the possible need for placement in special education (31).

Involvement of Parents and Other Stakeholders

The Hawkins-Stafford Amendments sought to make the Chapter 1 program more inclusive at the state and local levels. They required SEAs to form and consult with committees of practitioners, and they required parent involvement in order to increase the effectiveness of local programs. As in other areas of implementation, there has been steady if not dramatic change in the direction of institutionalizing the new requirements. Participation in program planning is broadening, and efforts to involve parents in local programs are on the rise. However, state policymaking has become more open to traditional constituents (e.g., local coordinators) than to less traditional ones (e.g., parents), and most committees of practitioners have not been quick to embrace the idea of high standards for program improvement. Local mechanisms for parent involvement feature traditional channels (e.g., parent conferences for Chapter 1 parents).

- The composition of committees of practitioners has not changed much since 1989-90; local Chapter 1 coordinators represent 25 percent of their members. Parent representation on these committees has declined from 17 to 14 percent.

- Committees of practitioners are increasingly recommending more stringent standards for identifying schools for program improvement; 29 of them now do so, compared with 17 originally. The committees have also become more active participants in the development of state rules, regulations, or policies.

- With continued encouragement from the SEAs--which are placing a higher priority on parent involvement in their program monitoring--districts are continuing to increase their use of several strategies for involving parents. Chapter 1 parent-teacher conferences are now found in 87 percent of districts, according to SEA reports. Strategies for parents who lack literacy skills or whose native language is not English are now found in 21 percent of districts, a significant increase over the 8 percent of districts using such strategies in 1989-90.

Schoolwide Projects and Innovation Projects

The Hawkins-Stafford Amendments experimented with two vehicles for broadening the program's contributions to educational improvement through nontraditional program designs. Schoolwide projects, although not a new option, no longer entail a required contribution of local matching funds; this new flexibility was balanced by new requirements for evaluating each project over three years and terminating those with poor results. Innovation projects permitted districts to use up to 5 percent of their basic grant for any of several specific purposes described in the law, including continuation of services to formerly eligible students and various approaches to program improvement.

- Schoolwide projects are operating in 1,712 schools in 42 states, representing 29 percent of eligible schools. This reflects a dramatic increase from 199 schools in 1988-89, the year before implementation of the new law.

- Of the 199 schoolwide projects that have completed three years of operation, 114 conducted the required evaluation, and 12 of these failed to show the necessary gains to continue as schoolwide projects. Among the problems in schoolwide-project evaluation reported by SEAs, the most common ones are that baseline data do not exist and standards are confusing.

- In the 213 districts conducting innovation projects, the most common areas of focus are parent involvement, staff training, continuation of services to students, and incentive payments.

Other New Provisions

The amendments were intended to fine-tune program operations in other administrative areas other than those already discussed here. For example, the law addressed issues in the provision of services to students who attend private schools by making special funds available to cover the capital expenses associated with serving these

students. SEAs are distributing these funds, and they report few problems associated with serving students who attend private schools.

The amendments also gave considerable attention to the coordination of services in several respects. First, the law underscores the requirement for coordination between Chapter 1 and the regular education program. Second, it requires coordination of education services with other special programs. It also encourages coordination between Chapter 1 and other social services that may complement the school's work with students and their families. While the survey findings indicate that SEAs are taking a variety of administrative steps to comply with these provisions, the effects of their work are impossible to gauge through a state-level survey.

- Capital expense funds for 1990-91 have been distributed to 521 districts in 46 states. Fifty-seven percent of the funds were allocated for reimbursement of past expenses; 43 percent were allocated for current expenses or efforts to increase participation in the future.

- Two kinds of coordination have drawn state administrative efforts: coordination between Chapter 1 and the regular program has reportedly increased as a monitoring priority in 40 states; collaborative efforts for Chapter 1 and other social services have been a focus of state-level interagency committees in 21 states.

Program Administration

Despite an 11 percent increase in staffing levels since 1989-90, the SEA coordinators continue to report difficulties in the effort to get everything done. This staffing increase has come at a time when total funding for Chapter 1 basic and concentration grants has increased by 28 percent, adjusted for inflation. Very few SEA coordinators have been able to staff their offices the way they would like, largely because of state-level factors such as hiring freezes. Much work goes into the application process: over the past two years, the SEA Chapter 1 offices have increased their level of contact with districts during application development and review. More offices have decreased the amount of monitoring they do than have increased it, but all maintain that they are now placing a higher priority on several programmatic areas during their

monitoring visits. The coordinators generally give high ratings to the monitoring and administrative work of the U.S. Department of Education.

- Generalists still outnumber programmatic specialists by almost two to one in SEA Chapter 1 offices.

- All but three coordinators point to barriers--most often a state hiring freeze (in 26 states) or low state salaries (in 24 states)--that have limited their ability to staff their offices the way they would like.

- While the narrative requirements for local applications have been somewhat streamlined over the past two years, the application process remains time consuming and labor intensive for SEAs. Most districts (59 percent) contact their SEAs with questions; SEAs in turn contact most districts (68 percent) due to problems in the completed applications.

- The frequency of onsite monitoring varies a great deal across states but is generally decreasing. Districts in the size range from 10,000 to 24,999, which tended to have annual monitoring in the past, are increasingly being monitored in cycles of two years or more. A monitoring cycle of four years or more, previously a rarity, is found in an increasing number of states.

- The requirements for program improvement have displaced monitoring effort in some states and have stimulated increased monitoring in others.

- Paradoxically, although 22 SEAs have reduced their level of monitoring in the past two years, virtually no SEAs report a lessened priority on substantive topics in monitoring. In general, areas emphasized in the Hawkins-Stafford Amendments (such as identification of schools in need of improvement) are reported to have gained in priority; traditional areas of emphasis in monitoring (such as needs assessment) are reported to have held steady.

- SEAs give generally positive ratings to federal program monitors, to the routine administrative work of the Compensatory Education Programs office, and to the Chapter 1 Policy Manual.

Conclusions

To the extent that the Hawkins-Stafford Amendments have fallen short of stimulating major educational change, our findings suggest two possible reasons. First,

the law's procedural requirements have been a focus of attention and concern at all levels of government--possibly at the expense of a substantive educational focus. An example is the amount of attention that goes into setting and meeting aggregate achievement standards, contrasted with the lesser attention to educational reform in Chapter 1 schools.

Second, SEAs (and perhaps district staff as well) simply feel that keeping up with their formal responsibilities is almost more than they can handle at current staffing levels. While dedicated to the integrity and quality of the Chapter 1 program, they do not feel that they are in a position to carry out major leadership initiatives. They report that their work in program improvement and parent involvement, to name two areas, is already hampered by a lack of time. Spearheading new directions in program reform is just not an option for most SEA coordinators. If they are to see it as an option, they may need new resources and they will certainly need very strong encouragement to forgo much of their traditional work in the more routine aspects of program administration.

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I. INTRODUCTION

Chapter 1 of Title I of the Elementary and Secondary Education Act authorizes supplementary educational services for students with low achievement in schools with relatively high levels of poverty. The program's roots go back to 1965, but it has undergone many legislative revisions over the years. The most recent amendments to Chapter 1 were the Augustus F. Hawkins - Robert T. Stafford Elementary and Secondary School Improvement Amendments of 1988.

Policy Studies Associates conducted a survey, on behalf of the U.S. Department of Education's Planning and Evaluation Service and Office of Compensatory Education Programs, to gather information from the state level on the implementation of the Hawkins-Stafford Amendments in the 1991-92 school year. The survey findings enable us to describe aspects of program operations so that policymakers can assess current strengths and weaknesses before the next program reauthorization. As one element in a full examination of program operations, this survey collected information about the policies, procedures, and perceptions of the Chapter 1 offices in state education agencies (SEAs). The SEA Chapter 1 offices are a crucial link in program implementation. They explain the law and regulations to their local education agencies (LEAs); they decide how to carry out some of the law's provisions; and they have a day-to-day familiarity with program design and related concerns in their districts.

The survey was mailed in October 1991 to Chapter 1 coordinators in the 50 states, the District of Columbia, Puerto Rico, and the Bureau of Indian Affairs. Of these 53 individuals, 50 returned the surveys (although not every respondent answered every question). This report presents the findings.

The Hawkins-Stafford Amendments include many innovative features:

- an accountability system in which schools identified by student performance must develop plans for improvement and, if their performance remains poor, must implement these plans;
- mandatory SEA involvement in the improvement process for schools that persist in showing low performance levels;

- two enhanced structures for involvement in the program: an advisory role for local practitioners in state rulemaking, and direct participation by parents in the educational programs of their own children;

- new conditions for schoolwide projects (a design permissible in schools with high levels of poverty, in which Chapter 1 funds may be used to benefit all students in the school)--removing a previous requirement for local matching funds, but adding new accountability procedures;

- increased emphasis on coordination between Chapter 1 and other services, including the regular instructional program of the school as well as other special services for eligible students.

Although the amendments changed these parts of the law, key elements of the Chapter 1 legal framework have remained unchanged through many legislative cycles, such as the following requirements:

- A school district receives funds only after its SEA has approved its program application.

- SEAs must ensure that districts comply with all provisions of the law and regulations.

- With few exceptions, services must be targeted to schools whose attendance areas have relatively high levels of poverty and, within these schools, to low-achieving students with the greatest needs for assistance.

- Several fiscal requirements are designed to ensure that Chapter 1 resources provide something extra for participating schools and students rather than substituting for state and local resources.

The survey findings tell a story of both change and continuity in Chapter 1. Indeed, one purpose of this survey was to identify ways in which implementation of the Hawkins-Stafford Amendments has evolved. Throughout this report, we refer to parallel information collected from SEA coordinators in 1989-90, the first year of implementing the amendments. The earlier survey found SEAs making a somewhat cautious start on their procedures for program improvement and accountability while at the same time carrying out the many new requirements for committees of practitioners, parent

involvement, schoolwide projects, innovation projects, and program coordination.[1] This report revisits all these topics and discusses the changes we found.

Although it covers a wide range of topics, this report is not a comprehensive examination of current practices in Chapter 1. It presents and analyzes data of only one kind--responses of SEA officials to mail questionnaires. The survey focused exclusively on matters on which SEA administrators have first-hand knowledge: the policies and procedures they have established, the information and questions they receive from all districts, and their own observations and opinions (labeled as such). For a more complete picture of program operations and issues, one could assemble and analyze data from other sources, such as actual school-improvement plans, principals' and local Chapter 1 coordinators' reported reasons for choosing or not choosing particular program designs, parents' accounts of their successes and failures in working with their children's schools, qualitative research on school improvement or effective program coordination, and so on. Other studies being conducted for the Planning and Evaluation Service are using these data sources and others; that office is integrating the findings into mandated reports to Congress. This report may be considered a reference work on program administration as viewed from the SEA level.

[1]Brenda J. Turnbull, Shepherd Zeldin, and Todd Cain, "State Administration of the Amended Chapter 1 Program" (Washington, DC: U.S. Department of Education, Office of Planning, Budget & Evaluation, August 1990).

II. PROGRAM IMPROVEMENT AND ACCOUNTABILITY

Probably the most dramatic innovation in the Hawkins-Stafford Amendments was the introduction of a system for program improvement and accountability intended to identify poorly performing Chapter 1 schools and to improve their student outcomes. Although student performance in Chapter 1 has been evaluated for years, the amendments attached new consequences to performance. The law specifies that any school in which Chapter 1 students show no gain or a decline in aggregate achievement must be identified as a school in need of improvement. The law also requires SEAs and districts to identify desired outcomes for Chapter 1 students and to incorporate these into their system of identifying schools for improvement. ED has strongly encouraged SEAs and districts to set standards that exceed the statutory minimum, thus identifying more schools and conducting the improvement process on a wider scale.

During the years that the law has been in effect, considerable attention has focused on the aggregate achievement requirements stated in normal-curve equivalent (NCE) gains. The achievement of students in grades 2 through 12 must be evaluated with standardized, norm-referenced tests in order to obtain NCE results. The federal law and regulations mandate the identification for program improvement of any school in which Chapter 1 students' achievement fails to improve from year to year in either basic or advanced skills, and in either reading or mathematics (if both subjects receive major emphasis in the program). At a minimum, then, schools giving primary emphasis to both subjects in Chapter 1 must show some gain in aggregate achievement measured in NCEs in basic reading skills, more advanced reading skills, basic mathematics skills, and more advanced mathematics skills. In some states, this "zero-NCE" standard prevails. In others, the SEA has set a higher minimum standard-- saying, for example, that schools must show gains of at least one NCE in each area.

Rather than basing the entire process of school identification on standardized test scores, the federal government has encouraged districts to set other desired outcomes that represent a demanding standard for schools. Among the possible measures for other desired outcomes are attendance rates, dropout rates, students' grades in academic

subjects, performance on state criterion-referenced tests, and many others. Desired outcomes other than NCEs must be used in the identification process for those services offered in preschool, kindergarten, or first grade. Under the law, desired outcomes other than NCE gains represent another hurdle for a school to clear; a school that falls short of showing "substantial progress" toward its desired outcomes must be identified for improvement.

A school identified as in need of improvement embarks on what may be a multi-year sequence of improvement activities. The district and school may spend as much as a year developing a plan for program improvement; in the next year, the school implements the plan; if student performance has not improved after a year under the plan, the SEA and district must develop and carry out a joint plan for improvement; if performance still falls short of the standard, the SEA and district must continue revising the joint plan until the school sustains an acceptable level of performance for more than one year.

Our survey gathered information about the status of program improvement in the fall of the 1991-92 school year. At that time, SEAs had reasonably complete information about two cohorts of identified schools--those identified on the basis of 1988-89 data and 1989-90 data. The identification process using 1990-91 data was still incomplete; for example, some districts use fall-to-fall data, which had not been fully analyzed at the time of this survey. However, enough time had passed since the amendments for some members of the first cohort of identified schools to be subject to joint state-local plans. The schools fully or partially implementing some kind of plan (whether state or local) included some identified for the first time in each of the three years.

In addition to mandating an improvement process for schools, the law requires districts to identify individual students who are not meeting the standards for achievement or other desired outcomes. Districts are to identify such students each year, to consider modifications in their programs, and to conduct a thorough assessment of the needs of students whose progress falls short of the standards after two years.

This chapter addresses several issues in program improvement on the basis of data from the SEAs. We first discuss the number of schools identified as in need of

improvement, presenting figures from SEAs on the schools identified in each of the first two years, the proportion that leave the improvement process from year to year, the schools currently implementing plans, and the schools identified for and implementing joint plans. Next, we discuss the standards adopted by SEAs. We then turn to the improvement process itself--how SEAs perceive its progress in schools, the funds they have disbursed to help in improvement, and the current status of joint plans. We analyze the considerable time the SEAs are reportedly devoting to all aspects of school improvement. The chapter concludes with information about procedures for student program improvement.

Number of Schools Identified

On the basis of performance data from 1989-90, there were 6,657 schools identified as in need of improvement in the 50 states responding to this survey. The comparable figure for the previous year had been 5,033 schools in 53 states (Figure II-1). Among states that provided data on both SEA surveys, the increase in the number of identified schools was 31 percent. The number had been expected to increase once all districts began to test students over a full-year interval (replacing the old system of fall-spring testing, which tended to yield higher achievement gains) and once desired outcomes were put in place as part of the system of standards.

Although the increase in the number of schools is clear, the proportion of all Chapter 1 schools identified as in need of improvement remains small. The 1989-90 data resulted in the identification of 13 percent of Chapter 1 schools in the 46 states that provided data on both the number of identified schools and the total number of Chapter 1 schools.

These total figures mask considerable fluctuation in the actual schools identified from year to year. Many schools have taken advantage of the full year allowed them to plan for program improvement, only to find at the end of the year that their students' performance has improved and they are no longer obliged to carry out a plan. This means either that the simple fact of being identified and starting a planning process has

a salutary effect on school performance or that aggregate achievement scores drawn from small numbers of students are unstable from year to year.

Figure II–1
Number of Schools Identified as in Need of Improvement

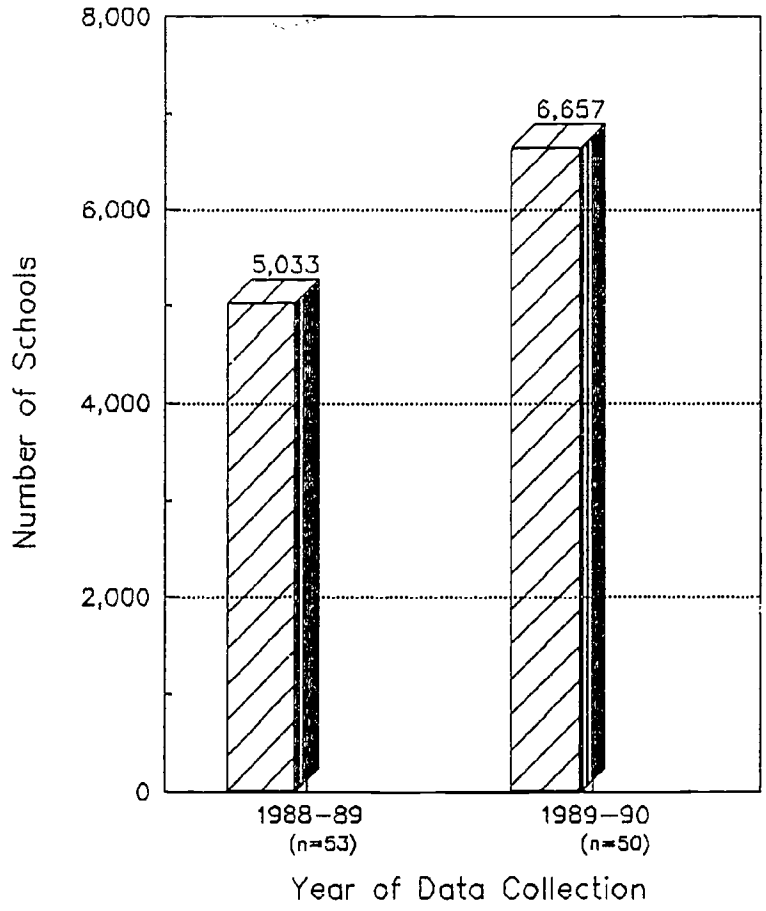


Figure reads: A total of 5,033 schools were identified for program improvement on the basis of outcome data collected 1988–89.

It is not at all unusual for a school to graduate out of the program improvement process before really doing much. When asked how many of the schools identified for program improvement tend to "test out" after one year, before implementing improvement plans, the mean response of SEA coordinators was 50 percent. Moreover, the responses spanned the full range from 0 to 99 percent, with no clustering around the mean (Table II-1). One-third of coordinators said that at least two-thirds of their identified schools had tested out of program improvement before implementing a plan, and eight coordinators said the rate was at least 90 percent. Since there is no relationship between the number of schools identified in a state and the rate at which its schools test out, the 50 percent rate can represent a national estimate of the phenomenon of testing out. (The rate does vary with the NCE standard used, as we discuss below in connection with the effects of standards.)

Table II-1

Percentage of Schools that "Test Out" of Program Improvement Before Implementing Plans, by State (n=45)

Reported Percent Testing Out	Number of SEAs
0 - 33%	17
34 - 66%	13
67 - 100%	15

Table reads: Seventeen coordinators report that the percentage of schools "testing out" of their identification for program improvement before implementing a plan is less than 34 percent.

Based on the coordinators' estimates of the number of schools that test out of program improvement, we can estimate that about 2,500 schools (half of the first identified cohort of 5,033) failed to meet the standards for two consecutive years. As Figure II-2 shows, this implies that the rest of the schools identified in the second cohort, about 4,200, were newly identified on the basis of 1989-90 data. Therefore, in the 1990-91 school year there were about 2,500 Chapter 1 schools (approximately 5 percent of all

Chapter 1 schools) required to implement an improvement plan and about 4,200 others required to develop a plan. A cumulative total of all schools identified in either of the first two years and required to develop plans was approximately 9,200 (5,000 in the first year and another 4,200 in the second).

Figure II–2
Year in Which Schools Were Identified as in Need of Improvement

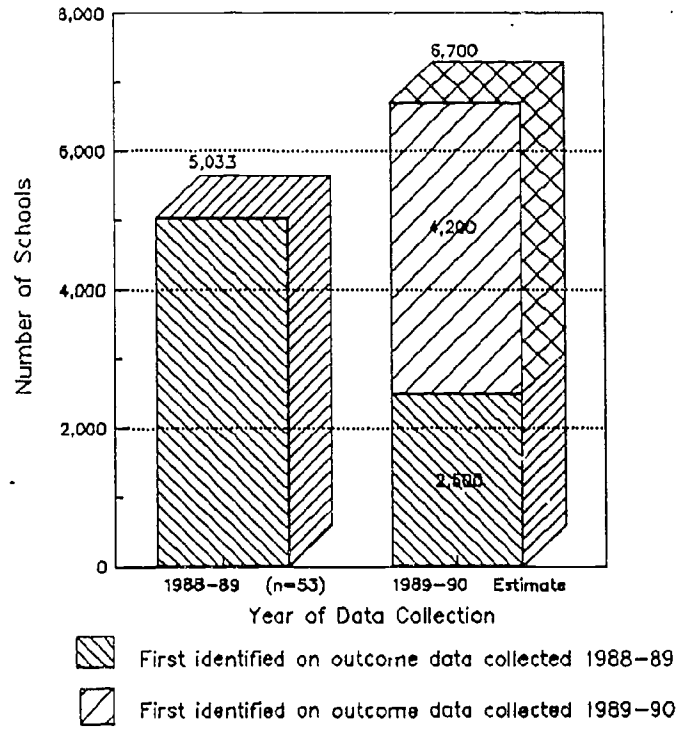


Figure reads: A total of 5,033 schools were identified for program improvement on the basis of outcome data collected 1988–89

Despite the fact that schools are exiting from the improvement process at high rates, there is a core group of schools that have failed for three consecutive years to meet standards for aggregate achievement or substantial progress toward desired outcomes. These schools have had their planning year and their year of implementing a local plan; because their students' performance continued to fall short of the standards in

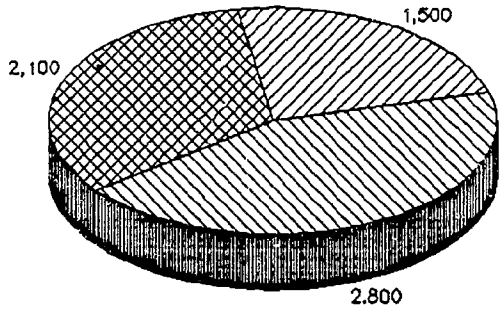
1990-91, they are now subject to joint state-local plans. The SEA coordinators report that 1,519 schools in 43 states have been identified for joint improvement plans. (Five coordinators did not respond to this question; two responded that they have no schools in this category.) Of the total, 300 schools are in a single state and the remaining 1,219 are in the other 42 states. The number probably has risen somewhat as districts and states have completed their analysis of 1990-91 performance data.

Among the schools that are subject to joint state-local plans, 1,027 are reported to be fully implementing their plans in this school year. Again, 300 of these are in one state, and the other 727 are in 21 other states. Thus, of the 43 SEAs that report at least one school identified for joint planning, 22 have at least one school fully implementing a plan and 21 have none.

During the 1991-92 school year, according to 48 responding SEA coordinators, there are 6,439 schools implementing plans for program improvement. This represents 14 percent of Chapter 1 schools in the 46 states that reported complete data.

The year-to-year fluctuation in the specific schools identified as in need of improvement makes it impossible to say precisely what the improvement histories of these 6,439 schools have been, but we can make plausible inferences. (Figure II-3 illustrates the estimates described here.) First, the total includes 1,519 schools identified for joint plans. For the most part, these schools are in their third year of identification for program improvement. Next, among the approximately 4,200 schools that we estimate were identified for the first time on the basis of second-year (1989-90) data, we can further estimate that about half--or 2,100--were again identified in the following year. These 2,100 schools are thus in their second year of identification and are required to implement their plans in 1991-92. Finally, we are left with a larger group of about 2,800 schools that represent several possible histories: some are in their first year of identification and are implementing their plans immediately; some were identified in either the first or second year, tested out, but are implementing their plans anyway.

Figure II-3
Estimated Breakdown of Schools Implementing Program Improvement Plans in the 1991-92 School Year



First identified on outcome data collected 1988-89

First identified on outcome data collected 1989-90

Schools identified on outcome data collected 1988-89 and/or 1989-90, then tested out of program improvement, but still implementing plan

Plus

Schools identified on outcome data collected 1990-91 and implementing plan immediately. (Our data do not permit separate estimates of these groups of schools.)

Figure reads: An estimated 1,500 out of 6,400 schools currently implementing plans for program improvement were first identified on the basis of outcome data collected 1988-89.

Standards for School Identification

The standards by which schools are identified for improvement have been controversial since the earliest days of implementing the Hawkins-Stafford Amendments. ED has encouraged states to set standards higher than the minimum levels of aggregate achievement established in the law. The early response of the states was cautious, based in part on concern about the feasibility of coping with a massive improvement process if high standards yielded a large crop of schools identified as in need of improvement.

Some years down the road, the trend among SEAs is toward more stringent criteria for school identification. We discuss here the current criteria, their relationship to the number of schools identified, and the local and state response to the standards.

Current State Standards

As shown in Table II-2, SEA standards reflect a combination of policies on aggregate achievement and policies on other desired outcomes. With respect to aggregate achievement, 23 SEAs (out of 50) reported on this survey that they have set a higher minimum standard than the one specified in the federal law and regulations. This number represents an increase since 1989-90, when 16 SEAs (out of 52) had done so, but it is still less than the 27 that are now using the statutory minimum requirement--that achievement gains must exceed zero NCEs. There has been some fluctuation in the group of states getting a higher standard. Of the 16 SEAs that had a higher standard in 1989-90, 10 have a higher standard in 1991-92; five reported that they now use the minimum standard; and one did not respond to this year's survey. Nationally, 30 SEAs require the use of desired outcomes other than NCE gains in 1991-92. Of these, five have specified the desired outcomes themselves and 25 have told the districts to do so.

Table II-2

SEA Standards for Identifying Schools in Need of Program Improvement
1991-92
(n=50)

	Number of SEAs		
	Setting an Achievement Standard Higher than the Minimum	Using the Minimum Achievement Standard	TOTAL
Requiring use of other desired outcomes	16	14	30
Not requiring use of other desired outcomes	7	13	20
TOTAL	23	27	50

Table reads: Sixteen SEAs set a standard for aggregate student achievement higher than the statutory minimum and require use of other desired outcomes in identifying schools in need of improvement.

Among the 27 SEAs that have adopted the minimal statutory standard for aggregate achievement, about half have required LEAs to set desired outcomes other than NCE gains. Three of these SEAs established the desired outcomes themselves, while 11 require the use of other desired outcomes but have told the LEAs to develop their own. This leaves a total of 13 SEAs that have exerted no independent muscle on standards; they use only the minimum standard for aggregate achievement and do not require other types of desired outcomes. A somewhat larger group of 16 SEAs has taken an aggressive stance, with both a higher standard for aggregate achievement and a requirement on desired outcomes. The remaining 21 SEAs reflect a mixed strategy. Of these, two-thirds are using the statutory minimum for achievement but have required the use of other desired outcomes; the remaining seven are relying on a higher achievement standard and leave desired outcomes up to local discretion.

Relationship Between Standards and Number of Identified Schools

What difference do SEA standards make in the number of schools identified for program improvement? Our data show that SEA policies on aggregate achievement have a clear relationship to the number of schools identified, while SEA policies on desired outcomes do not (Table II-3). In the percentage of schools implementing improvement plans this year (schools that belong, as we have seen, to any or all of the three cohorts of identified schools), the SEAs that now have a minimum achievement standard above the legal minimum standard show a figure of 20 percent of Chapter 1 schools, contrasting with 8 percent in states whose SEAs use the minimum standard. Similarly, the SEAs with higher achievement standards exceed the other SEAs in the percentage of schools identified on the basis of 1989-90 data, the percentage identified for joint plans, and the percentage implementing joint plans. The SEAs that have consistently reported using a higher standard show the highest percentages of schools in all these categories.

There is less relationship between state policies on other desired outcomes and the number of schools identified. Among SEAs that have either spelled out desired outcomes other than NCE gains themselves or required districts to do so, 15 percent of Chapter 1 schools are implementing improvement plans--a figure that is not very different from the 14 percent figure nationwide or from the 12 percent found in states that have taken no action on other desired outcomes. Moreover, the SEAs without requirements for other desired outcomes actually have had a slightly higher percentage of schools identified on the basis of 1989-90 data, and there are only slight differences across SEAs in the number of schools in some stage of joint planning.

Table II-3

Schools Identified for Program Improvement under Different SEA Standards

SEA Policy on Standards	Percent of Chapter 1 Schools			
	Implementing Improvement Plans	Identified by 1989-90 Data	Identified for Joint Plans	Implementing Joint Plans
NCE standard exceeding minimum, 1989-90 and 1991-92	28	27	8	7
NCE standard exceeding minimum, 1991-92	20	16	5	3
Minimum NCE standard, 1991-92	8	10	1	0
Other desired outcomes required, 1991-92	15	13	3	2
Other desired outcomes not required, 1991-92	12	15	3	1
Nationwide percent	14	13	3	2

Table reads: In states where the SEA has had a standard for aggregate achievement higher than the statutory minimum in both 1989-90 and 1991-92, 28 percent of Chapter 1 schools are implementing improvement plans.

There is a relationship between higher NCE standards and the rate at which schools test out of identification for program improvement, but our data do not suggest that the phenomenon of schools testing out would be eliminated by the adoption of higher achievement standards. The SEAs that have consistently had achievement standards higher than the zero-NCE minimum report an average rate of 34 percent of schools testing out before implementing plans. The SEAs that now use NCE standards higher than the minimum report an average rate of 40 percent of schools testing out; the figure for SEAs now using the minimum standard is 60 percent. On the other hand, there is almost no difference in the rate at which schools test out across states that do or do not require the use of other desired outcomes; their rates are 49 percent and 51 percent respectively.

Response to the Standards

According to most SEA coordinators, local Chapter 1 projects have major concerns about meeting the standards associated with school improvement. The subject of the most widespread concern is meeting the required NCE gains, followed closely by measuring progress toward other desired outcomes, setting other desired outcomes, the accuracy of the identification process, and identifying schools; each of these was reported to be a major concern in at least half of the responding states (Table II-4). Somewhat fewer SEAs reported major local concerns about setting desired NCE gains, presumably because the other states have relatively few districts that do this.

The only step associated with setting outcomes, measuring progress, or identifying schools that does not seem to worry districts much is that of exempting schools from program improvement on the basis of local conditions. It is reasonable to infer that in many of the 20 states where exempting schools is not a local concern it is simply not perceived as an option.

Table II-4

Degree of Local Concerns about Standards and School Identification, as Perceived by Coordinators (n=49)

Aspect of Program Improvement	Number of SEAs Calling the Aspect... A Major Local Concern	A Minor Local Concern	Not a Local Concern
Meeting required NCE gains	32	16	1
Measuring progress toward desired outcomes	30	16	3
Setting desired outcomes other than NCE gains	30	14	5
Accuracy of identification process	28	15	6
Identifying schools	25	18	6
Setting desired NCE gains	20	26	3
Exempting schools on the basis of local conditions	9	20	20

Table reads: Based on the questions that districts have raised, 32 SEA coordinators describe the general degree of concern with meeting required NCE gains as "major."

When asked for their own views on the effectiveness of standards related to program improvement, the SEA coordinators responded with a general endorsement of the principles embodied in the standards but with less enthusiasm for specific provisions (Table II-5). Two-thirds of respondents strongly agree with the notion of focusing on individual schools rather than district Chapter 1 projects, and none strongly disagrees. Large majorities agree with the global statement that the requirements for program improvement have been helpful to the Chapter 1 program, and with the idea that setting desired outcomes and measuring progress is beneficial for districts.

Table II-5

SEA Assessment of the Effectiveness of Standards

	Number of Coordinators Who...			
	Strongly Agree			Strongly Disagree
The focus on the school, rather than the district Chapter 1 project, is effective (n=50)	34	12	4	0
The requirements have been helpful to the Chapter 1 program (n=49)	24	20	4	1
LEAs have generally benefitted from setting desired outcomes and measuring progress toward them (n=50)	17	23	10	0
Desired outcomes other than NCE gains are an effective basis for identifying schools (n=50)	15	19	15	1
A standard that uses aggregate performance on more advanced skills is effective (n=50)	13	24	8	5
The current system for identifying schools has credibility (n=49)	8	24	15	2
A standard that uses aggregate performance on basic skills is effective (n=50)	7	26	9	8

Table reads: Thirty-four SEA coordinators strongly agree that focusing on individual schools is an effective aspect of the program-improvement requirements.

Table II-5 also shows that coordinators are more divided in their opinions of the effectiveness of specific types of standards for school identification. The coordinators as a group endorse these three types of standards--desired outcomes other than NCE gains, aggregate performance on more advanced skills, and aggregate performance on basic skills--but 16, 13, and 17 coordinators, respectively, disagree with them. Indeed, only seven coordinators strongly agree that schools should be identified on the basis of aggregate student performance on basic skills, although a majority of respondents is willing to go along with such a standard.

Does the Identification System Have Credibility?

On the overall question of the credibility of the current system for identifying schools, coordinators give a lukewarm response (Table II-5). While most agree to some extent that the system is credible, those who strongly agree are outnumbered three to one by those who agree less strongly. This echoes the coordinato ' perception, reported in Table II-4, that in 28 states the accuracy of the identification process is a major local concern. It also reflects the mixed verdict from the coordinators themselves on the accuracy of the process: 18 call it good, 23 fair, and 9 poor.

Those SEAs that have taken steps to shape the identification process by setting their own standards hold a somewhat higher opinio ` its quality and credibility. Among the 23 SEAs that now use an achievement standard higher than the federal minimum, 11 call the accuracy of the process good, 10 fair, and 2 poor. On the question of the credibility of the identification system, 18 of the 23 coordinators in higher-standard states agree that it has credibility, while in minimum-standard states 14 of the coordinators say they agree and 13 say they disagree.

Although the coordinators overall give less than a resounding endorsement of the system's credibility, they stop short of blaming the identification process for any problems encountered in school improvement. Just eight say that the identification of the "wrong schools" is a major barrier to school improvement; of these, six are in minimum-standard states. Overall, 16 call the identification of the wrong schools a minor barrier to improvement, and 26 say it is not a barrier.

The Improvement Process

Once a school is identified as in need of program improvement, what happens? Chapter 1 students will not benefit from the apparatus of program improvement and accountability unless schools make serious efforts to overhaul their instructional programs. On this survey, SEA coordinators provided information about several aspects of the improvement process. They assessed the seriousness with which schools have approached the process and the barriers encountered; they described their procedures

for allocating the funds set aside for program improvement and the characteristics of joint state-local plans.

Local Responses and Concerns in School Improvement

With only modest reservations, SEA coordinators report that schools identified as in need of improvement are approaching the process seriously. When asked to agree or disagree with the statement, "Most of the identified schools in this state have taken program improvement seriously," 21 strongly agreed, 25 somewhat agreed, four somewhat disagreed, and none strongly disagreed. Coordinators also characterize the implementation of improvement plans as a concern for districts, although it is less of a concern than developing these plans (Table II-6). This discrepancy in concern about plan development and plan implementation may be explained by the fact that more schools have had to develop a plan than have had to implement one.

Table II-6

Local Concerns about the Program Improvement Process, as Perceived by Coordinators (n=49)

Aspect of Program Improvement	Number of SEAs Calling the Aspect... A Major Local Concern	A Minor Local Concern	Not a Local Concern
Developing plans for school improvement	29	20	0
Implementing plans for school improvement	23	24	2

Table reads: Based on the questions that districts have raised, 29 SEA coordinators describe the general degree of concern about developing plans for school improvement as "major."

Barriers to Improvement

From SEAs, a picture emerges of a process that would be reasonably likely to result in real improvement--if only more time were available for SEA staff to lead the process and, to a lesser extent, for local staff to carry it out. When asked to identify

major and minor barriers to improvement, the coordinators resoundingly cited "limited SEA staff time" as the leading barrier; 34 of them termed it a major barrier, 13 a minor barrier (Table II-7). Limited staff time at the local level is perceived as a major barrier by 29 coordinators and a minor barrier by 17.

Table II-7

Barriers to School Improvement Perceived by SEAs
(n=50)

Factor	Number of SEAs Calling the Factor... A Major Barrier	A Minor Barrier	Not a Barrier
Limited SEA staff time	34	13	3
Limited LEA staff time	29	17	4
Limited LEA staff skill in program improvement	14	31	5
Limited funds	14	25	11
Local resistance	8	31	11
Wrong schools identified	8	16	26
Limited SEA staff skill in program improvement	7	25	18
Inadequate technical assistance from TACs/RTACs or others	0	11	39

Table reads: According to 34 coordinators, limited SEA staff time is a major barrier to school improvement.

If more time could become available, according to most coordinators, only minor problems would remain. Among these other problems, as Table II-7 shows, would be limited local skill in program improvement, limited funds, and local resistance. (It is somewhat surprising that limited funding ranks lower among the perceived barriers to improvement than limited local staff time, because more staff time could be purchased with more money.)

To a lesser extent, the coordinators acknowledge that limits on SEA staff skill in program improvement may hinder the effectiveness of the process; 32 say this is a barrier, but 25 of these call it a minor one. For the most part, coordinators do not see

inaccuracies in the identification process as much of a barrier to improvement. They are even less likely to think that schools need more external assistance from anyone other than SEAs; just 11 call inadequacy of such help a minor barrier, and none calls it a major barrier.

Grants for Program Improvement

Section 1405 of Chapter 1 sets aside funds for program improvement, to be disbursed by SEAs, which totaled $5.8 million in the 1989-90 school year, $12.5 million in 1990-91, and $14.8 million in 1991-92. Early information showed that SEAs were distributing these funds at a deliberate pace; therefore, we asked about the time lag a school typically experiences between its identification and the receipt of improvement funds. We also obtained information about the size of grants and the basis on which SEAs allocate them.

According to the SEAs, the pace of awarding Section 1405 dollars has quickened considerably since earlier school years. In January 1990, just eight SEAs had begun to disburse their funds for that year. However, by December 1991, 45 SEAs had disbursed some or all of their funds for the current school year. (Two coordinators said they had not yet distributed any funds, and three did not respond to the question.) When we asked coordinators this year about the typical time interval between identifying a school as in need of improvement and providing Section 1405 funds to the district, the mean response was five months. Thus, for example, a school that was identified in June on the basis of student performance in the spring would receive its money before the end of the calendar year.

The funds available under Section 1405 are not intended to cover the full cost of improvement but rather to provide a modest incentive to encourage districts and schools in the improvement process. Reflecting the overall size of the set-aside, these grants are tiny in relation to the cost of a serious school-improvement effort. Across 47 SEAs responding to a question about the average grant for each identified school, the median is just $2,500. In 16 SEAs, the funds average less than $2,000 per school (Table II-8).

Table II-8

Average Grant of 1990-91 Section 1405 Funds per Identified School, By State
(n=47)

Average Grant Size per School, 1990-91 Funds	Number of SEAs
Less than $1,000	4
$1,000 - 1,999	12
$2,000 - 2,999	12
$3,000 - 3,999	7
$4,000 - 4,999	3
$5,000 or more	9

Table reads: Four SEAs have made grants of 1990-91 Section 1405 funds that average less than $1,000 for each school identified as in need of improvement.

The small size of the grants may help account for the coordinators' report that districts have a low level of concern about obtaining them. Just seven coordinators say that obtaining these funds is a major concern for districts; 20 call it a minor concern, and 12 say it is not a concern.

Section 1405 funds are distributed through a discretionary process in 28 states, on a formula basis in 18 states, and with a combination of formula and discretionary elements in four states. Where SEAs use formulas, these typically include an amount for each building and/or an amount for each Chapter 1 student enrolled.

Joint Plans

This is the first school year in which substantial numbers of schools have been identified for joint state-local improvement plans. Information from the SEAs suggests that most of these plans so far embody only modest differences from the local plans that were already in place in the schools. In the 38 states providing information about joint plans, all but one said they differ from the local plans by virtue of the greater amount of technical assistance from SEA staff (Table II-9). A majority of respondents also noted

that the plans include a more intensive needs assessment and more assistance from the Technical Assistance Center (TAC) or Rural Technical Assistance Center (RTAC). In just one-fourth to one-third of states, the joint plan schools have a larger share of Section 1405 resources, a significantly different educational approach, or more assistance from sources other than TACs or RTACs. Only four SEAs report that a larger share of dollars from districts' basic Chapter 1 grants are going into the schools subject to joint plans.

Table II-9

Differences Between Joint SEA/LEA Plans and
LEA Plans Already Implemented
(n=38)

Differences	Number of SEAs
More technical assistance from SEA staff	37
More intensive needs assessment	27
More technical assistance from TAC or RTAC	23
A larger share of Section 1405 resources	13
Significantly different educational approach	12
More technical assistance from other providers	11
Not very different in approach or resources	6
More dollars from the basic grant go into the schools	4

Table reads: In 37 states, joint SEA/LEA plans for program improvement include more technical assistance from SEA staff than the LEA plans already implemented.

Since assistance from the SEA is the crucial distinguishing characteristic of joint planning, it is worth knowing how extensive this assistance is. We asked SEAs how many days they expect their staff members to spend onsite this year in each school implementing a joint plan. The median response was between two and three person days per school. The three SEAs that gave the highest estimates on this question (15, 20, and 30 days per school respectively) do not yet have any schools implementing joint

plans; the one that estimated 10 days per school has just one school implementing a plan.

To estimate how much total time the SEAs are currently committing to visiting schools with joint plans, we multiplied each SEA's number of schools implementing a plan by the number of days its staff would reportedly spend in each school. Among those SEAs that have at least one school implementing a joint plan, the median number of total days is 24. Just six SEAs are projecting at least 100 person days in joint plan schools. At the upper end is one that has 168 such schools and expects to spend an average of three person days in each, or a total of 504 days. Next comes one with 300 schools, expecting to spend one day in each, or a total of 300. The grand total of days across states is 1,764, which is an onsite presence roughly equivalent to eight full-time SEA staff members for all 1,027 schools.

The SEAs that have set higher standards for school identification (which have higher percentages of schools implementing improvement plans) are spending relatively large numbers of days visiting their schools that are implementing joint plans. Across the 11 SEAs that have set an NCE standard higher than the federal minimum and that have schools implementing joint plans, the mean number of total person days in these schools is 117; across the 10 SEAs with the minimum NCE standard, the mean total is 48 person days. However, since more schools are affected in the higher-standard states, the mean number of person days per school is under three in these states, compared with four person days per school in the states using the minimum standard for identification.

The SEA Time Commitment to Program Improvement

SEA coordinators have consistently observed that administering the provisions for Chapter 1 program improvement is time consuming. On this survey, the coordinators' estimates of the overall percentage of SEA staff members' time devoted to program improvement and accountability have a mean of 32 percent across states; the median is 28 percent. As Table II-10 shows, this question elicited a fairly wide range of responses. Although about half fell within the range of 21 to 40 percent, seven SEAs report

spending 10 percent or less of their staff time on program improvement and accountability, and five SEAs place the figure at more than 70 percent.

The fact that SEAs generally report spending a fairly high proportion of their staff time on program improvement is consistent with their view that the new requirements for program improvement are the most burdensome aspect of the Chapter 1 law. (We discuss the SEAs' rankings of several aspects of the legal requirements on both burden and necessity in Chapter IV of this report.)

Table II-10

SEA Chapter 1 Staff Time Devoted to Program Improvement and Accountability
(n=48)

Percentage of Staff Time	Number of SEAs
1 - 20%	15
21 - 40%	23
41 - 60%	5
More than 60%	5

Table reads: Coordinators in 15 SEAs estimate that from 1 to 20 percent of staff time is devoted to program improvement and accountability.

Nationally, the SEAs report that Chapter 1 administration involves a total of 681 full-time equivalent staff members. Using their reports of the percentage of staff time devoted to program improvement, we can derive a rough estimate that around 200 full-time equivalents of SEA staff time go into this aspect of the program each year.

Although the following estimates are quite speculative, our data suggest that a surprisingly small proportion of the SEA time spent on program improvement and accountability is actually devoted to helping schools improve. Recall that the time spent in schools with joint plans adds up to about eight full-time equivalents nationwide. In the 5,400 schools implementing local plans, the typical amount of direct assistance from the SEA is less than in the schools implementing joint plans. Using a generous estimate that each school implementing a local improvement plan receives one or two days of SEA staff time, the total time spent directly helping these schools could amount to

between 20 and 50 full-time equivalents. As a ballpark estimate, then, we can say that the job of helping identified schools absorbs only about 20 to 25 percent of the 200 person years that SEAs are spending on the whole area of program improvement and accountability. (A plausible lower limit for this estimate is about 15 percent, and a plausible upper limit is about 30 percent.)

Most of the SEA staff time devoted to program improvement and accountability is apparently spent on other aspects of administering the improvement provisions such as setting standards for the identification of schools, explaining the identification process to districts, reviewing performance data, conducting general workshops on needs assessment and program quality, and administering Section 1405 funds. Since SEA staff members spend a high proportion of their time reviewing applications and monitoring the program, it is likely that they spend a good deal of the time devoted to program improvement overseeing adherence to the prescribed process in all districts--those with and without identified schools. Presumably a time-consuming job for the SEAs is monitoring to see that identified schools are developing plans for improvement, even though about half of such schools are apparently destined to test out of improvement status before carrying out their plans.

If our estimates of SEA time allocation are close to being correct, they suggest that the administrative aspects of the improvement process are not concentrated on upgrading the programs of schools identified for improvement. Rather, the time-consuming features of the process seem to be those that apply to all districts and schools--i.e., to school identification--and to a process of needs assessment and planning that in many cases never leads to the implementation of program change.

This conclusion is consistent with the coordinators' observation about the relative degree of local concern with implementing plans for school improvement: as Table II-6 showed, the number calling it a minor or nonexistent concern (26) slightly exceeds the number calling it a major concern (23). By contrast, nearly every aspect of standard setting, measurement, and school identification has stirred major local concern in a majority of responding states (Table II-4, above).

Student Program Improvement

Finally, we have some information about the way SEAs and districts are responding to the requirements for student program improvement. The law requires districts to identify students who are not meeting local program standards, to consider modifying these students' programs, and to conduct a thorough needs assessment for students who have failed to progress after two years in Chapter 1.

Student program improvement reportedly causes minor local concern in most states. Twenty-seven SEAs called this area a minor concern for their districts; 17 called it a major concern, and five said it is not a concern.

SEAs have offered districts several kinds of advice for working with the students identified for student program improvement (Table II-11). The leading suggestion is to provide more intensive Chapter 1 services; this is closely followed by the idea of modifying the regular, non-Chapter 1 instructional program. Fewer states, but still more than half, encourage districts to provide identified students with a different Chapter 1 program (not just a more intense version of the existing program).

Table II-11

Program Modifications Encouraged by SEAs
for Student Program Improvement
(n=49)

Local Action	Number of SEAs Encouraging
Provide more intensive Chapter 1 services	37
Modify regular (non-Chapter 1) instructional program	35
Evaluate students' placements to determine if special education services may be appropriate	31
Provide a different program than other Chapter 1 students receive	26
None of the above; we leave it up to LEAs	5

Table reads: For students who have not shown gains after two years in the program, 37 SEAs encourage districts to provide more intensive Chapter 1 services.

Another frequent recommendation from SEAs is that districts evaluate students' placements to determine whether they need special education services. In the 31 states where this practice receives SEA encouragement--and in the districts that are doing it without SEA encouragement in other states--this procedure could work in either of two ways. Looking on the bright side, it could result in diagnosing real disabilities that have hindered students' performance, that are not adequately addressed through Chapter 1 services, and that can possibly be overcome with appropriate help from specialists. A less rosy scenario is that a local Chapter 1 program may place its lowest achievers in special education so that their poor performance will no longer drag down the school's aggregate achievement in Chapter 1. Perhaps SEA monitors--who are reportedly spending more time on student program improvement, as we discuss in Chapter IV--are warning districts not to use special education services in this latter way.

Summary

Although the apparatus of program improvement and accountability affects all districts and has caused major local concerns, there is a distinction to be made between the processes of setting standards and identifying schools--which engage widespread local concern--and the process of improving a school that has an ineffective program. The actual improvement process is not a concern everywhere, because few schools are identified for program improvement and even fewer show the sustained low level of performance that makes them subject to a mandate to carry out an improvement plan. The joint state-local improvement plans are a surprisingly small-scale endeavor for SEA staff members, who are a key partner in the process and are often the chief source of assistance: They are expected to spend only about two person days in each school implementing a plan.

Number of Schools Identified

- SEAs report a total of 6,657 schools identified as in need of improvement on the basis of performance data from 1989-90, or 13 percent of Chapter 1

schools in the states providing complete data. This figure is 31 percent higher than in the previous year.

- On average, coordinators estimate that 50 percent of identified schools show high enough performance at the end of their planning year that they are no longer identified for improvement--even though they have not actually implemented their plans. In 15 states, more than two-thirds of identified schools "test out" in this way.

- The total number of schools identified for joint state-local improvement plans is 1,519 in 43 states. Of these, 1,027 in 22 states are reported to be fully implementing their plans this year. One state accounts for 300 schools subject to joint plans, all of which are implementing their plans.

- Coordinators report that 6,439 schools are implementing plans for program improvement in 1991-92; they represent 14 percent of all Chapter 1 schools in the reporting states.

Standards for School Identification

- Twenty-three SEAs currently set a standard for aggregate achievement that exceeds the statutory minimum; 27 use the minimum standard. Thirty require the use of other desired outcomes, while 20 do not.

- The SEAs with higher standards for aggregate achievement are identifying a higher proportion of schools for program improvement--20 percent of their schools in 1989-90, compared with 8 percent among states using the minimum achievement standard. However, SEA policies on other desired outcomes do not show a distinct relationship to the number of schools identified.

- According to most SEAs, districts have major concerns about meeting the required NCE gains, measuring their progress, setting desired outcomes, and identifying schools accurately.

- Large majorities of SEA coordinators endorse the principles of school improvement; for example, 44 agree that the requirements have been helpful to the Chapter 1 program. Somewhat fewer endorse the actual statutory standards for identifying schools (e.g., 37 agree with the use of aggregate performance on more advanced skills, 34 agree with the use of desired outcomes other than NCEs, and 33 agree with the use of aggregate performance on basic skills).

The Improvement Process

- Nearly four years after enactment of the Hawkins-Stafford Amendments, planning for improvement looms larger as a local concern than actually carrying out plans. While 29 SEAs perceive major local concern with the development of program improvement plans, 20 perceive major concern with the implementation of plans.

- When asked to identify barriers to school improvement, coordinators focus on the limited time devoted to the process at both state and local levels; 34 of them call limited SEA time a major barrier, and 29 call limited local time a major barrier. Most identify as minor barriers limited local skill in program improvement, limited funds, and local resistance. Most (37) do not think schools need any more help from anyone other than SEAs or district staff.

- Small grants of Section 1405 funds for program improvement, with a median size of $2,500 per identified school, are moving from SEAs to school districts within an average of 5 months from the time a school is identified as in need of improvement.

- The first wave of joint plans features few major innovations besides the mandated presence of SEA involvement. In most states where joint plans exist, they include more intensive needs assessment than is found in the local plans (in 27 of 38 states) and more assistance from Chapter 1 Technical Assistance Centers (23 states). Smaller numbers of SEAs report that their joint plans are distinguished by significantly different educational approaches (12), more Section 1405 resources (13), more assistance from others such as independent consultants (11), or more funds from the district's basic grant (4).

SEA Time Commitment to Program Improvement

- SEA coordinators estimate that a median of 28 percent of their staff time goes into all aspects of the improvement and accountability process. This is a nationwide time commitment on the order of 200 full-time-equivalent (FTE) staff per year.

- Although SEAs consider themselves a key source of assistance for identified schools, they estimate that their staff members will spend only about two or three days in each school implementing a joint plan this year.

Their presence in schools that are at earlier stages of the improvement process is presumably even less substantial.

Student Program Improvement

- Most coordinators (27) term student program improvement a minor concern for their districts, while 17 call it a major local concern and five say it is not a local concern.

- The most frequent SEA suggestions for working with students who have not made progress after two years of Chapter 1 participation are to provide more intensive Chapter 1 services (37 SEAs), to modify the regular instructional program (35), to consider the possible need for placement in special education (31), and to provide a Chapter 1 program different from what other students receive (26).

III. HOW SEAS HAVE HANDLED OTHER NEW PROVISIONS

The Hawkins-Stafford Amendments introduced other provisions to the Chapter 1 program, intended to make the program more responsive to its constituencies and more educationally effective. This chapter discusses the current implementation of several such changes: the committees of practitioners formed to advise SEAs, parent involvement in local programs, schoolwide projects, innovation projects, provision of Chapter 1 services for students who attend private schools, and coordination between Chapter 1 and other educational and noneducational services for children and youth.

Committees of Practitioners

In an effort to broaden participation in state Chapter 1 policymaking, the Hawkins-Stafford Amendments added a new step to the state rulemaking process: consultation with a committee of practitioners, which must include administrators, teachers, parents, members of local boards of education, and representatives of private school students. Each SEA has been required to form a committee and to have the committee review the state program improvement plan. In addition, the committees must review "major" rules and regulations or, in the absence of formal rules, "policies that the SEA and LEAs are required to follow" (34 CFR 200.70(e)(2)).

Committee Membership

In the 50 states responding to the survey, the committees of practitioners have a grand total of 893 members. The mean committee size is 18 members and the median is 16; the range is from five to 48 members. We obtained information on the committees' composition from all but one of the 50 responding SEAs with a total of 873 committee members, and the results are shown in Table III-1. SEAs were asked to provide a duplicated count of their committee members--that is, a member belonging to more than one of the specified categories listed in Table III-1 would be counted twice. In most respects, the composition of the committees of practitioners has changed very little since their original formation. The table shows that in both 1989-90 and 1991-92, the

constituencies most heavily represented are Chapter 1 coordinators, teachers, parents, local administrators other than Chapter 1 coordinators (e.g., superintendents or curriculum supervisors), and SEA staff. However, the number of parents on committees has dropped by 22 percent overall. For the 1991-92 school year, if there were such a thing as an "average" committee, it would comprise four or five local Chapter 1 coordinators, three teachers, two or three parents, two local administrators, two SEA staff members, one or two members of local boards, one or two representatives of private school students, one or two principals, and another member. The "other" category is diverse, including evaluators, parent involvement coordinators, supervisors, and neglected or delinquent representatives. The "average" committee for 1991-92 would differ from the "average" committee that existed in 1989-90 only by having one fewer parent member or one more local Chapter 1 coordinator.

Table III-1

Representation of Groups on Committees of Practitioners, 1989-90 and 1991-92

Group	Total Number of Committee Members		Percent of All Committee Members	
	1989-90 (n-52)	1991-92 (n=49)	1989-90 (n=52)	1991-92 (n=49)
Local Chapter 1 coordinators	215	216	24	25
Teachers	155	146	17	17
Parents	154	119	17	14
Local administrators other than Chapter 1 coordinators	111	112	12	13
SEA staff	89	92	10	11
Members of local boards	74	68	8	8
Representatives of private school children	71	68	8	8
Principals	69	68	8	8
Other	38	37	4	4

Table reads: Nationwide, in 1989-90, 215 local Chapter 1 coordinators belonged to committees of practitioners. In 1991-92, 216 local Chapter 1 coordinators belong to committees of practitioners. They represent 24 and 25 percent of all committee members in the responding states, respectively.

What the Committees Have Done

On average, committees of practitioners meet twice a year. The number of meetings per year ranges from one to "seven or eight," but only three committees meet more than four times annually.

The involvement of committees in the development of rules, regulations, or policies has become more widespread since 1989-90, when many SEAs reported no committee involvement in this activity. While the level of committee involvement at each stage of the process varies from state to state, some commonalities are evident (Table III-2). Committees are least involved in drafting new rules or policies; they are most involved in commenting on initial drafts--a stage in which four-fifths of SEA coordinators describe the committee's involvement as "extensive." This represents a considerable increase in involvement since 1989-90, when 23 committees were described as having extensive involvement in commenting on draft rules or policies. Another marked change since 1989-90 is the decline in the number of committees that are totally uninvolved in each stage of rulemaking, especially soliciting comments from others and deciding on the final content of rules or policies (Table III-3).

Table III-2

Involvement by the Committee of Practitioners
in Developing SEA Rules, Regulations, and Policies
1991-92
(n=50)

	Number of SEAs Rating Involvement...			
Aspect of Development	Extensive 1	2	3	None 4
Initial writing of new rules or policies	5	7	16	22
Commenting on initial draft	41	5	3	1
Soliciting comments from others	10	19	15	6
Deciding on final contents of rules or policies	23	18	6	3

Table reads: Coordinators in five SEAs said the committee of practitioners has had extensive involvement in the initial writing of major SEA rules, regulations, or policies.

Table III-3

Number of Committees of Practitioners with
No Involvement in Developing SEA Rules
1989-90 and 1991-92

Aspect of Development	Number of SEAs Rating Involvement as "None"	
	1989-90 (n=52)	1991-92 (n=50)
Initial writing of new rules or policies	29	22
Commenting on initial draft	2	1
Soliciting comments from others	25	6
Deciding on final contents of rules or policies	21	3

Table reads: In 1989-90, coordinators in 29 SEAs said the committee of practitioners had no involvement in the initial writing of rules or policies; in 1991-92, 22 coordinators did so.

Do committees of practitioners deter SEAs from setting higher than minimum standards to identify schools for program improvement? This question arose out of the site visits to five SEAs conducted in the fall of 1989 in connection with the earlier state survey, which revealed that some committees had persuaded their SEAs to set relatively low standards in order to limit the number of schools identified. Two years later, although many committees favor less stringent standards, they are outnumbered by those that recommend demanding standards. In setting standards for identifying schools in need of improvement, federal law mandates the identification of any school in which Chapter 1 participants, in the aggregate, do not demonstrate an NCE gain greater than zero. Twenty-nine (out of 49) committees of practitioners currently recommend standards higher than those required by federal law. Twelve of those have consistently recommended more demanding policies beginning with their initial input three years ago. Twenty committees support the adoption of the minimal standards specified in the federal law. Of these, 15 committees have been consistent in their advocacy for less stringent policies. In other words, these committees now include 29 that favor higher desired outcomes and 20 that favor less stringent ones; initially, 17 favored higher desired outcomes while 32 did not (Figure III-1).

Figure III-1
Trends in Committees of Practitioners' Recommendations on Standards for School Improvement (n=49)

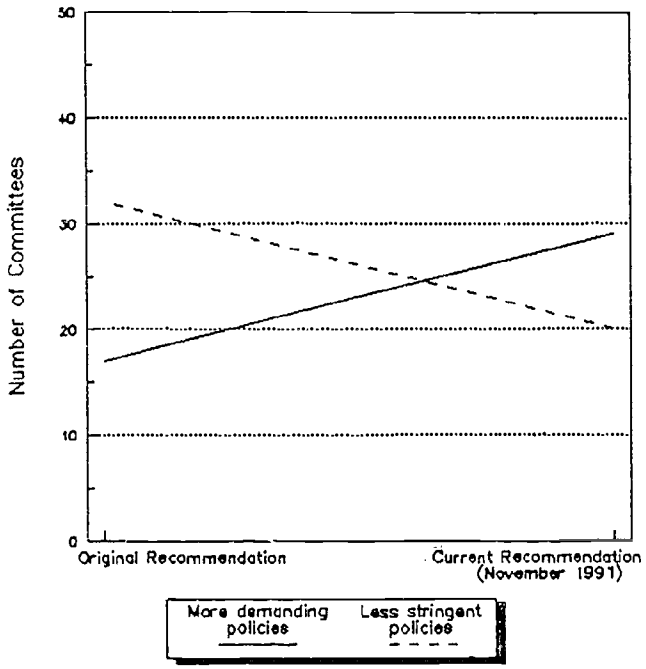


Figure reads: Originally, as reported by SEA coordinators 17 committees of practitioners recommended more demanding standards for identifying schools in need of improvement; currently, 29 do so.

Committees of practitioners are interested in a number of areas, the most prominent being NCE gains and other desired outcomes, resources for helping schools in need of improvement, and SEA plans to work with schools in need of improvement (Table III-4). The coordinators report that all of the committees have effectively contributed to the Chapter 1 program in their states. Eighteen coordinators described their committees as "very effective"; 31 described their committees as "somewhat effective." No coordinator described his or her state's committee as ineffective.

Table III-4

Interests of the
Committees of Practitioners

Area	Number of Committees of Practitioners Calling the Area.... A Major Interest	A Minor Interest	Not an Interest
Normal curve equivalent (NCE) gains (n=50)	35	12	3
Other desired outcomes (n=50)	33	16	1
Resources for helping schools in need of improvement (n=50)	33	17	0
SEA plans to work with schools in need of improvement (n=50)	31	18	1
Identification of students not making gains (n=49)	24	23	2
Parental involvement (n=49)	19	27	3
Schoolwide projects (n=49)	11	23	15
Private school student participation (n=50)	9	34	7
Other (n=5)	4	1	0

Table reads: Coordinators in 35 SEAs identified normal curve equivalent (NCE) gains as a major interest of their committee of practitioners.

Parent Involvement

The Hawkins-Stafford Amendments intensified the Chapter 1 program's emphasis on parent involvement, especially with regard to individual parents' engagement in their children's education. Although parent involvement has been a feature of Chapter 1 and its predecessor, Title I, since the earliest days of the program, the aims and methods of involving parents have shifted over the years. During the 1970s, the Congress increasingly tightened the requirements dealing with parents' advisory role in Title I projects, so that by the end of the decade each participating district and school was required to have a parent advisory council. The advent of Chapter 1 in 1981 removed

these requirements, substituting a more general mandate for consultation with parents. During the 1980s, and culminating in the Hawkins-Stafford Amendments, the focus has increasingly shifted to parent involvement in the educational programs of their own children. The Hawkins-Stafford Amendments retain the requirement for parent input in program planning, design, and implementation (which can occur through parent advisory councils or other means); but they also require districts to inform parents about their children's program, and they authorize districts to provide materials, training, and assistance for parents to work with their children at home.

Capacity of SEAs to Promote and Support Parent Involvement

Thirty-eight (out of 50) SEA Chapter 1 offices have no staff members whom they would characterize as parent specialists. Nationwide, eight full-time-equivalent (FTE) staff positions in SEA Chapter 1 offices are devoted to parent involvement, with staff positions in each of 12 states ranging from 0.1 to 1.5 FTEs. The total number of FTEs nationwide has remained constant since 1989-90; however, the configuration among states has changed. Of the 14 states that employed at least a part-time parent specialist in 1989-90, only five still employ parent specialists. Seven SEAs have since created such a position in the SEA.

With such a small representation of parent specialists on SEA staffs, it comes as little surprise that limited SEA staff time was the factor most widely cited as a major barrier to SEA impact on parent involvement (Table III-5). However, the coordinators rank limited SEA expertise in parent involvement very low on the list of barriers, suggesting that they believe existing staff members have the requisite knowledge but simply lack the time to put it to work. Also frequently cited as barriers were limited district staff time and local resistance to establishing parent involvement as a priority.

As a group, the state coordinators are increasingly persuaded of the importance of parent involvement. When asked to judge which of 11 different categories of Chapter 1 requirements are the most necessary for attaining the objectives of the program, they ranked parent involvement fourth, on average (Table IV-12). It was surpassed only by the targeting of attendance areas and students, and procedures for needs assessment. Parent involvement has moved up from a rank of seventh on the same list since 1989-90.

Table III-5

Barriers to SEA Impact on Parental Involvement

Factor	Number of SEAs Calling the Factor... A Major Barrier	A Minor Barrier	Not a Barrier
Limited SEA staff time (n=48)	26	19	3
Difficult in establishing parent involvement as a local priority (n=48)	23	20	5
Limited LEA staff time (n=48)	21	22	5
Insufficient access to outside resources (n=48)	9	19	20
Local conditions such as a migrant or language minority population (n=47)	8	21	18
Limited LEA staff knowledge of parent involvement issues (n=47)	6	29	12
Limited SEA staff knowledge of parent involvement issues (n=48)	0	23	25
Unclear regulations (n=48)	0	15	33

Table reads: Coordinators in 26 SEAs identified limited SEA staff time as a major barrier to SEA impact on parental involvement.

Although the federal regulations concerning local applications do not require a narrative description of plans for parent involvement, 39 SEAs required a narrative in 1991-92. Additionally, parent involvement has reportedly become a more prominent focus of attention during onsite monitoring. Thirty-four SEAs have made parental involvement a greater priority for these visits, the coordinators report.

District Activities in Parent Involvement

Although SEAs have only partial information about the activities taking place in districts, the survey responses provide some information about the prevalence of various types of activities and their rate of increase (Table III-6). (There is probably some upward bias in the figures here, since we have data only from those SEAs that can

estimate the prevalence of an activity--a group that probably includes the SEAs that encourage the activity and excludes the ones that are indifferent to it.) Parent-teacher conferences are the most widespread vehicle for parent involvement. These conferences are the only activity reportedly under way in a majority of districts (87 percent in the responding states), and the number of districts conducting them has increased by 19 percent since 1989-90 in those states for which we have data for both years. The increase of districts conducting parent-teacher conferences is a trend that reaches back several years. The original State Survey of Chapter 1 Programs saw a 14 percent increase in percentages of districts holding conferences from 1988-89 to 1989-90. Other popular means of promoting parent involvement include training parents to assist their children at home, training staff to work with parents, and disseminating home-based education activities.

Table III-6

Prevalence of Local Activities in Parent Involvement, 1991-92

Activity	Number of Districts, 1991-92	Percent of Districts, 1991-92	Percent Change Since 1989-90*
Chapter 1 parent conferences (n=45)	10,939	87	+19 (n=41)
Training parents to assist their children at home (n=45)	5,958	49	Not available
Training staff to work with parents (n=45)	5,436	45	Not available
Dissemination of home-based education activities (n=46)	5,267	43	+8 (n=40)
Parent advisory councils (n=47)	4,174	33	+8 (n=38)
Parents as classroom volunteers, tutors, or aides (n=47)	4,082	32	+4 (n=35)
Special strategies for parents who lack literacy skills or whose native language is not English (n=44)	2,465	21	+148 (n=38)
Liaison staff working with parents, training teachers, or coordinating activities (n=47)	2,136	17	-5 (n=42)
Parent resource centers (n=47)	1,207	9	+14 (n=39)

* Based on the number of states shown, where SEAs provided estimates for both years.

Table reads: In 1991-92, 45 SEAs reported that 10,939 districts are having Chapter 1 parent conferences. This is 87 percent of the Chapter 1 districts in these states. In the 41 states for which we have two estimates, there has been a 19 percent increase in districts holding conferences since 1989-90.

Most of the parent activities included in both surveys have increased in popularity since 1989-90. The exceptions are the relatively costly activities: parent resource centers remain few in number, and there has been a slight decrease in the proportion of districts that employ liaison staff to work on parent involvement. The fastest-growing activity is the use of special strategies for parents who lack literacy skills or whose native language is not English. SEAs report that such strategies are now found in 2,465 districts, or 21 percent of the total; in 1989-90 they trailed the list of parent-involvement activities, being reported in 876 districts (8 percent). The proportion of districts implementing such strategies increased by 148 percent.

Schoolwide Projects

A vehicle for using Chapter 1 to upgrade the entire school program--consistent with many current reform initiatives--is the schoolwide project. These projects, permissible in schools where at least 75 percent of the students in the school or the attendance area come from families in poverty, use Chapter 1 funds throughout the school rather than targeting funds to selected students. Although schoolwide projects have been part of Chapter 1 and Title I since 1978, the Hawkins-Stafford Amendments removed a major hurdle associated with setting up these projects: a previous requirement that districts must supply extra funds for schoolwide-project schools. (The formula for this matching requirement called for funds equal to the district's per-pupil Chapter 1 spending multiplied by the number of students in the school who would not ordinarily qualify for Chapter 1 services.) However, the amendments introduced procedural and accountability requirements for schoolwide projects, including the requirement that a schoolwide project must end after three years if student performance in the school fails to meet specified standards. The law also prescribes a process of planning and consultation among parents, teachers, and administrators.

Participation in Schoolwide Projects

Participation in schoolwide projects has continually increased since the Hawkins-Stafford Amendments were enacted (Table III-7). Our respondents reported a total of over 1,712 projects in 520 districts in 42 states. (Two coordinators were unable to specify the number of schools operating schoolwide projects. Thus, there are 1,712 schoolwide projects in 40 states, plus an unknown number in two other states.)

Table III-7

Participation in Schoolwide Projects
1988-89, 1989-90, and 1991-92, Reported by Coordinators

Unit	Number Participating		
	1988-89 (n=52)	1989-90 (n=47)	1991-92 (n=49)
States	22	40	42
School districts	69	202	520
Schools	199	621	1,712

Table reads: In 1988-89, schools in 22 states had schoolwide projects, according to coordinators' reports.

Figure III-2
Participation in Schoolwide Projects 1988-89, 1989-90, and 1991-92, Reported by Coordinators

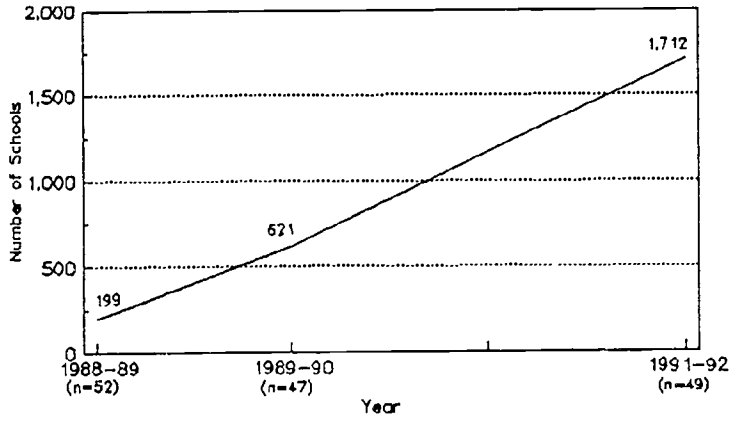


Figure reads: In 1988-89, 52 SEA coordinators reported that there were 199 schoolwide projects.

Schoolwide projects are now found in virtually every state that has eligible schools--42 of the 44 such states. Another five SEAs report that they have no schools with 75 percent poverty concentrations. Forty SEAs could tell us how many eligible schools they have in 1991-92, and these total 5,262. The number of schoolwide projects in these states is 29 percent of all eligible schools. In twelve states, over 50 percent of all eligible schools are schoolwide projects. In three of these states, all eligible schools are schoolwide projects.

In the 41 states where SEA coordinators could provide us with data on the number of participating schools for both 1989-90 and 1991-92, the increase in the number of participating schools has been 178 percent. Just two states have fewer schoolwide projects this year than last (in one state a decline from 31 to 30, in the other state a decline from 2 to 1). The coordinators in five states that had no schoolwide projects in 1989-90 reported that they now have some. These five states that are new to the schoolwide-projects option have 18 projects among them.

SEAs and Schoolwide Projects

Virtually all the SEAs with schools eligible to be schoolwide projects have communicated with districts about the option of schoolwide projects, most often as part of their routine communications with districts. In 43 of 44 responding SEAs, individual SEA staff have discussed the option with the districts they work with. Thirty-four SEAs have placed schoolwide projects on the agenda of more general workshops, while 28 have offered workshops focused specifically on schoolwide projects.

There is a relationship between the extent of local participation in the option of schoolwide projects and the extent to which the SEA has actively promoted the option. Among the 28 states where fewer than 50 percent of eligible schools are schoolwide projects, 14 of the SEAs provided workshops specifically on the schoolwide option; in 12 states where over 50 percent of all eligible schools are schoolwide projects, 11 did so. This includes states whose number of eligible schools is quite small. In two of the three states where all eligible schools are schoolwide projects, the numbers of schoolwide projects are eight and 12 respectively. The enthusiasm of the SEA for the schoolwide option is apparent in these states, where the SEAs have put on special workshops dealing

with this option for the benefit of only a few schools statewide. In the third state where all eligible schools are schoolwide projects, there are 112 projects. This SEA not only focuses on the schoolwide option as the major topic of a workshop, but also conducts staff development activities for eligible buildings in different districts.

When asked to respond to a series of statements about the benefits and possible expansion of the schoolwide option, the SEA coordinators as a group displayed cautious enthusiasm (Table III-8). Most agreed with the statement, "Schoolwide projects have been a catalyst for major change in most participating schools"; almost all agreed that "Educationally deprived children get their fair share of the benefits of schoolwide projects." However, coordinators were more likely to agree strongly with the first of these statements than the second. Most coordinators (29) also agreed with the proposition that schoolwide projects should spread to virtually all eligible schools. Twenty-six endorsed the idea that schoolwide projects should be extended into schools with somewhat lower poverty levels, while 14 disagreed.

Table III-8

Coordinators' Opinions About Schoolwide Projects

Statement	Number of Coordinators Who... Strongly Agree 1	2	3	Strongly Disagree 4
Schoolwide projects have been a catalyst for major change in most participating schools (n=39)	14	16	7	2
Educationally deprived children get their fair share of the benefits of schoolwide projects (n=40)	11	26	3	0
Virtually all schools eligible for schoolwide projects should move to implement them (n=40)	14	15	9	2
Schools with somewhat lower poverty levels (e.g., 65 percent) would make good use of schoolwide projects (n=40)	13	13	10	4

Table reads: Coordinators in 14 SEAs strongly agree that schoolwide projects have been a catalyst for major change in most participating schools.

Evaluation Requirements of Schoolwide Projects

To continue as a schoolwide project after three years, a school must show gains among educationally deprived children that exceed the average gains of (a) comparable Chapter 1 students in the district as a whole, or (b) comparable Chapter 1 students in the same school for the three years prior to the implementation of the schoolwide project. To date, this check on ineffective projects has seldom been invoked; just 12 schools in six states have failed to show the necessary achievement gains for continuation as schoolwide projects.

All of the schoolwide projects in the first cohort of projects following the Hawkins-Stafford Amendments--a total of 199 projects in 22 states--should have conducted the three-year evaluation. However, only 114 schools in 12 states (out of 37 respondents) have done so. The failure to conduct the evaluation may be due, in part, to problems that districts are encountering with the evaluation. Twenty-three SEA coordinators reported that baseline data do not exist. Twenty reported that the standards are confusing.

Even among schoolwide projects that have completed the evaluation, problems exist. In four of the six states where projects have failed to show the required level of gains, state coordinators reported that the districts are reluctant to give up their schoolwide projects. A different subset of four state coordinators reported that districts are not able to put other designs into place quickly. Other problems cited by these six states include maintenance of effort, interpretive changes by ED, and a lack of emphasis on thorough needs assessment and coordination.

Innovation Projects

The Hawkins-Stafford Amendments introduced innovation projects to Chapter 1. Under this option, a school district may use up to 5 percent of its basic Chapter 1 grant for one or more specific purposes authorized in the law. The SEA must approve innovation projects. The purposes are diverse, covering both the extension of services to students who would otherwise not qualify (because their test scores have risen above a

cut-off point or because they have moved to an ineligible school as the result of a desegregation order) and various activities for program improvement.

The number of districts implementing innovation projects has risen since 1989-90, but the number remains small. Respondents report a total of 213 districts nationwide, in 26 states, that are currently operating innovation projects. In 1989-90, 97 districts nationwide, in 23 states, operated innovation projects. Three SEAs have rejected a total of 37 applications for innovation projects for 1991-92.

We obtained information on the purposes of the innovation projects from all but one of the 26 SEAs, with a total of 210 districts currently operating innovation projects (Table III-9). The purposes of the projects are varied, and many districts incorporate several components into a single project. The most prominent components entail parent involvement, training school personnel about the needs of Chapter 1 students and integrating Chapter 1 into regular classroom programs, continuation of services to students who received services in any preceding year, and incentive payments to schools with promising Chapter 1 programs.

Students Who Attend Private Schools

School districts are required to make Chapter 1 services available on an equitable basis to students enrolled in nonpublic schools. In 1985, the provision of Chapter 1 services to private school students was reshaped by the U.S. Supreme Court decision in Aguilar v. Felton. In this case, the Court ruled that the provision of educational services in sectarian schools by public school teachers was unconstitutional. Consequently, Chapter 1 instruction must now occur at religiously neutral sites such as mobile vans, public schools, or portable classrooms situated on leased property. Funding for alternative delivery sites must come off the top of a district's basic grant as part of its administrative budget. The Hawkins-Stafford Amendments authorized capital expense funds to cover the costs of noninstructional goods and services incurred in implementing these alternative service sites.

Table III-9

Components of Innovation Projects, 1991-92
(n=46)

Component	Number of Districts Whose Innovation Projects Provide...	Percent of All Innovation Projects
Innovative approaches to parental involvement or rewards to or expansion of exemplary parental involvement programs	87	41
Training of Chapter 1 teachers, regular teachers, and librarians in the needs of eligible children and integration of Chapter 1 activities into regular classroom programs	62	29
Continuation of services to children who received services in any preceding year	55	26
Incentive payments to schools that have demonstrated significant progress or success in Chapter 1	40	19
Encouraging the involvement of community and private sector resources in serving eligible children	21	10
Assistance by LEAs to schools identified as in need of program improvement	18	8
Continuation of services to children who are transferred to ineligible areas or schools as part of a desegregation plan	5	2

Table reads: Nationwide, 87 districts have implemented innovation projects that promote innovative approaches to parental involvement. This represents 41 percent of all innovation projects.

Capital Expense Funds

Available since 1989-90, capital expense funds are allocated to states according to each state's number of Chapter 1 students attending nonpublic schools in the year before the Felton decision of 1985. SEAs then allocate capital expense funds to districts. For 1990-91, 538 districts in 46 states applied for capital expense funds. Of those, a total of 521 districts in 46 states received funds; only 17 districts in seven of the states did not receive capital expense funds for which they applied.

We obtained information on the amount of 1990-91 capital expense funds distributed to districts by 45 of the SEAs. In those states, a grand total of $22,402,900 was distributed, with state totals ranging from $500 to $4,625,636. The median amount of capital expense funds distributed in each state was $164,434. Overall, 57 percent of these funds--$12,698,115--was used for reimbursement for past expenses incurred since July 1, 1985, to provide services to private-school students; 13 SEAs distributed all their capital expense funds as reimbursement for past expenses. A total of 43 percent of the funds--$9,704,785--was used to cover current expenses associated with serving private-school students or costs of efforts to increase the number of private-school students served in the future. Eleven SEAs distributed all their capital expense funds to cover current or future expenses.

Administrative Procedures for Serving Private School Students

Chapter 1 regulations stipulate certain administrative procedures for the provision of services for private school students, including consulting with nonpublic school officials and offering services that are equitable to those in public schools. There were no administrative requirements that a majority of the coordinators reported as a major problem, although they did indicate that some issues arise in carrying out some of the requirements (Table III-10). The areas in which problems most often arise are coordinating services with the regular instructional program of the private school, ensuring adequate and timely communication with private-school officials, and increasing the participation rate. The areas least likely to pose problems are making the services educationally effective, informing LEAs about capital expense funds, and determining student eligibility.

Coordination with Other Educational and Noneducational Services

Coordinating Chapter 1 with the regular education program and other special services has been a concern of federal policymakers and program administrators for many years. The Hawkins-Stafford Amendments formalized this concern by specifying

that local applications should address coordination, and suggesting coordination as a means of improving performance in schools identified as in need of improvement.

Table III-10

Problems in Administering the Chapter 1 Requirements for Serving Students who Attend Private Schools

Requirement	Number of Coordinators Rating Requirement... Major Issue	Minor Issue	Not an Issue
Coordinating services with the regular instructional program of the private school (n=47)	14	24	9
Ensuring adequate, timely communication with private school officials (n=47)	14	23	10
Increasing the participation rate (n=47)	14	23	10
Offering services that are satisfactory to private school officials or parents (n=47)	11	25	11
Involving private school parents in the program (n=47)	10	26	11
Determining how to apply program improvement provisions to services for students attending private schools (n=46)	9	23	14
Making the services educationally effective (n=47)	7	26	14
Informing LEAs about capital expense funds (n=47)	4	11	32
Determining student eligibility (n=47)	2	19	26
Other (n=4)	4	0	0

Table reads: Coordinators in 14 SEAs consider the coordination of services with the regular instructional program of the private school to be a major issue in administering the Chapter 1 requirements for students attending private schools.

Coordination With the Regular Instructional Program

Initially, SEAs responded to the heightened emphasis on coordination by increasing the specificity of the local application requirements in this area. In 1988-89, before the Hawkins-Stafford Amendments took effect, 25 SEAs asked districts to

describe in their applications how coordination between Chapter 1 and the regular instructional program would occur; the others required only an assurance. The following year, the number asking for a description rose to 35. In 1991-92, 32 (out of 48) SEAs required a description. This is consistent with a slight, general trend toward more streamlined applications (which we discuss in the next chapter of this report).

However, 40 (out of 49) coordinators indicated that the SEA is placing more priority on the coordination of instruction during its onsite monitoring visits, compared with monitoring two years ago, thus indicating that the emphasis on coordination may actually be increasing. Furthermore, when asked directly if the SEA promotes coordination with the regular school programs, 42 coordinators replied that they do so to a great extent; the other eight said they do so to a moderate extent.

Coordination With Other Federal and State Education Programs

The emphasis on coordination with other federal and state education programs has shown similar trends, but this area appears to be a lesser priority for SEAs than coordination with the regular program (perhaps reflecting the fact that special programs are not found everywhere, while every school has a regular program). In 1988-89, 11 SEAs asked for a description of coordination with other special programs on the local application; the next year, 19 did so. In 1991-92, 14 (out of 48) SEAs asked for a description. Twenty (out of 49) SEAs report that they have placed more priority on coordination with other federal and state education program during onsite monitoring visits; 26 states report no change in emphasis. Three states are placing less priority on this area.

Chapter 1 varies in its relationship to state compensatory education programs, Chapter 1 migrant programs, bilingual programs, and special education. Administrative efforts by SEAs and districts promote the coordination of these programs, although such endeavors are not universal. The most common forms of coordination are written guidance from the SEA encouraging programs to work together, and the sharing of student records through formal, routine arrangement developed by districts (Table III-11).

Table III-11

Coordination Between Chapter 1 and Other
Federally Supported Services

Means of Coordination	Special Education (n=49)	Chapter 1 Migrant Program (n=47)	Bilingual Education Program (n=39)	State Compensatory Education Programs (n=17)
Encouraged by written guidance from the SEA to work together	26	18	14	10
Student records shared through formal, routine arrangement developed by LEAs	20	22	17	6
Administered in the same office in the SEA	-	32	9	9
Monitored jointly	8	18	10	6
Consolidated application submitted	-	1	0	5
Other	5	11	3	3

Table reads: Chapter 1 and special education are encouraged by written guidance from 26 SEAs to work together.

Across all of these programs, the most widespread connection is simply the presence of both programs in many of the same schools and, less commonly, serving many of the same students in the same year (Table III-12). This overlap of service does not prove that coordination of service takes place. Instead, it indicates how widespread the need for coordination is.

Table III-12

Presence of Other Federally Supported Services
in Chapter 1 Schools

Level of Overlap	Special Education (n=49)	Chapter 1 Migrant Program (n=47)	Bilingual Education Program (n=39)	State Compensatory Education Programs (n=17)
Serves many of the same schools	44	37	29	15
Serves many of the same students in the same year	31	28	20	11
Serves many of the same students in different years	10	11	8	4

Table reads: Chapter 1 and special education serve many of the same schools in 44 states.

Coordination With Other Services for Children

Recent endeavors at the federal, state, and local levels are aimed at bringing together a range of services to offer children and youth more comprehensive, integrated services. Collaboration activities may include the sectors of education, health, social services, public welfare, housing, and juvenile justice. Coordinators in 25 (out of 49) states are aware of such collaborative activities under way in their states that involve Chapter 1 staff, services, or funds. The most prevalent of these activities--practiced in 20 states--entails interagency committees between the SEA and other state agencies. In 17 states, local interagency committees have been formed between an LEA and other local agencies. Other means of coordination include jointly funded programs between either an SEA or a district and other state or local agencies.

In the 25 states whose coordinators are aware of collaboration between Chapter 1 and other service sectors, most coordinators are currently participating in the collaborative efforts and are giving districts some encouragement to pursue integrated services. Twenty-one have attended meetings with representatives from other state agencies, and 22 have attended workshops for SEA or local staff on the issue of collaboration. Twenty-three coordinators have communicated with local Chapter 1 staff

about collaborative programs at the local level, and 13 have encouraged districts in writing to collaborate with other service providers.

Summary

The legal provisions discussed in this chapter reflect different approaches to improving the Chapter 1 program. Establishing committees of practitioners at the state level and requiring parent involvement in local decisionmaking have the aim of making the program more responsive to its constituencies. Requiring parent involvement in the educational program and coordination of Chapter 1 with other services, as well as permitting schoolwide and innovation projects, all reflect ideas about what can make local Chapter 1 programs more educationally effective.

Many of the trends that were manifest in the earlier stages of the implementation of the Hawkins-Stafford Amendments have continued. Since Hawkins-Stafford, several areas of program requirements have gained in priority at the SEA level. Additionally, each year more districts are taking advantage of the different services allowed under the law by expanding their parent involvement programs, applying for innovation projects, and opting for schoolwide projects.

Committees of Practitioners

- The composition of committees of practitioners has changed little since 1989-90. The largest single group of members nationwide is still made up of local Chapter 1 coordinators (rising slightly from 24 percent to 25 percent of all members). Parent representation has diminished from 17 to 14 percent of all members nationwide.

- Since 1989-90, more committees have become active participants in the development of state rules, regulations, or policies; 41 now have "extensive" involvement in commenting on drafts, and 23 are extensively involved in deciding on the final content of rules.

- Committees of practitioners are increasingly recommending more stringent standards for identifying schools for program improvement. Twenty-nine committees recommend setting standards that are higher than the minimum required by federal law. Only 17 took this stance when they first considered the issue of standards.

- The committees are more interested in topics related to program improvement than in other administrative areas. More than half of the committees of practitioners are interested in each of the following areas: NCE gains, other desired outcomes, resources for helping schools in need of improvement, and SEA plans to work with schools in need of improvement.

- All of the coordinators report that their committees have effectively contributed to the Chapter 1 program.

Parent Involvement

- SEAs have increasingly emphasized parent involvement as a key component of the Chapter 1 program. SEAs report that they have placed a greater priority on parent involvement during onsite monitoring compared with two years ago. They also consider parent involvement a more important contributor to the success of the program than they did in 1989-90.

- Twenty-six coordinators report that the greatest barrier to SEA impact on parent involvement is limited SEA staff time.

- Among the activities that SEAs know districts are carrying out, Chapter 1 parent-teacher conferences rank first (occurring in 87 percent of all districts). The fastest-growing activity is the use of special strategies for parents who lack literacy skills or whose native language is not English (an increase from 8 to 21 percent over two years in the proportion of districts implementing such strategies).

Schoolwide Projects

- The number of schools operating schoolwide projects has risen each year. According to SEA reports, schoolwide projects are operating in 1,712 schools in 42 states. In 1989-90, there were 621 schoolwide projects in 40 states.

- Among eligible schools, 29 percent overall are operating schoolwide projects. In 12 states the proportion is over 50 percent; in three it is 100 percent.

- The three-year evaluation for schoolwide projects has been troublesome for many local projects. Twelve schools out of 114 that have conducted the three-year evaluation failed to show the necessary gains to continue as a schoolwide project. Not all of projects that have completed three years of

operation (a total of 199) conducted the evaluation. Among the problems in evaluation reported by SEAs, the most common ones are that baseline data do not exist and the standards are confusing.

Innovation Projects

- The use of innovation projects is increasing but remains uncommon. SEAs report a total of 213 districts conducting innovation projects in 1991-92. This is more than twice the number of districts conducting innovation projects in 1989-90.

- Most innovation projects incorporate several foci. The most prominent are parental involvement, personnel training, continuation of services to students who would otherwise not qualify, and incentive payments.

Services for Private School Students

- Districts nationwide are obtaining capital expense funds. A total of 521 districts in 46 states received capital expense funds for 1990-91. Just over half of the funds (57 percent) were allocated for reimbursement for serving private school students; 43 percent were allocated for current expenses or efforts to increase participation in the future.

- Coordinators report that they experience few major problems in carrying out the requirements associated with private-school students.

Coordination with Other Instructional and Noninstructional Programs

- Compared with two years ago, 40 SEAs are reportedly placing a higher priority on the coordination between Chapter 1 and the regular school program during onsite monitoring. Coordination with other federal and state programs has experienced less of a reported increase as a focus for monitoring.

- Collaborative activities that integrate Chapter 1 and other social services are under way in 25 states. The most prevalent activity is the formation of interagency committees between the SEA and other state agencies. State Chapter 1 coordinators in 21 of the states have participated in these meetings. Similar numbers have also attended workshops on coordination and are communicating with districts about collaborative efforts.

IV. SEAS' ADMINISTRATIVE RESPONSIBILITIES

The means by which SEA Chapter 1 offices place their imprint on the program remain those of past years and decades: internal staffing decisions, application review and approval, monitoring, and liaison with ED. This chapter discusses each of these SEA functions.

Staffing for SEA Chapter 1 Offices

Among the 50 SEAs responding, there are a total of 681 full-time equivalent (FTE) staff members working on Chapter 1 matters (Table IV-1). This represents an 11 percent increase since 1989-90. Although three states claim staffs of more than 50 FTEs, Chapter 1 offices of this size are the exception rather than the rule; in a majority of SEA Chapter 1 offices there are fewer than 10 FTEs, with 20 offices falling in the five to eight FTE range.

The responsibilities of SEA Chapter 1 staff reflect the traditional emphasis on general program oversight, with growing attention to instruction and program evaluation. The largest staff category in SEA Chapter 1 offices remains that of "generalists," which includes 58 FTE directors and deputy directors and 256 FTEs who take general responsibility for oversight of a group of districts within the state. As was the case in 1989-90, generalists outnumber specialists in Chapter 1 offices by nearly two to one. Among the 164 FTE specialists in Chapter 1 offices, subject specialists are the greatest in number, followed by fiscal specialists. Though still outnumbered by these two groups, evaluation specialists experienced significant growth in the two years between surveys and now represent 6 percent of SEA Chapter 1 staff members nationwide. In the category of "other professional staff," four SEAs reported a total of five FTEs working as program improvement specialists; other SEAs may also have staff members with this title.

Table IV-1

Number of SEA Chapter 1 Staff
1989-90 and 1991-92

Functions	Numbers of Positions in Full-time Equivalents (FTEs) 1989-90 (n=52)	1991-92 (n=50)	Percent Change 1989-90 to 1991-92
Generalist*	262	314	+20
Specialist	141	164	+16
Subject specialist	50	60	+20
Parent specialist	8	8	0
Evaluation specialist	27	41	+52
Audit/fiscal specialist	56	55	-2
Other**	29	31	+7
Secretarial/support	184	172	-7
Total	616	681	+11

* These are staff who have general oversight responsibilities for Chapter 1 operations in particular school districts. This number includes the state Chapter 1 director.

** Examples include program improvement specialist, account clerk, and statistician.

Table reads: Nationally, state officials reported 262 FTE staff performing generalist functions during 1989-90 and 314 FTE staff performing these functions in 1991-92. This represents a 20 percent increase since 1989-90 in the number of FTE staff performing these functions.

The vast majority of state coordinators indicated that they have been unable to staff their offices the way they would like, with only three coordinators stating that "staffing is adequate" in their offices (Table IV-2). Most frequently cited as a barrier to staffing are state hiring freezes, which have affected SEA staff hiring in 26 SEAs. Twenty-four state coordinators said that low state salaries make it difficult for them to staff the way they would like, and 20 cited extensive processing requirements for new hires in their state as a barrier. While statewide fiscal woes are primarily responsible for staffing difficulties according to most coordinators, one in three believes that inadequate federal funding is at least partly to blame.

Table IV-2

Perceived Barriers to Adequate
Staffing in SEA Chapter 1 Offices
(n=50)

Barrier	Number of SEAs
A state hiring freeze	26
Low state salaries	24
Extensive processing required for new hires	20
Inadequate federal funds	17
Other barriers	12
No barriers; staffing is adequate	3

Table reads: In 26 SEAs, a state hiring freeze was a barrier to staffing the Chapter 1 office the way the coordinator would have liked.

Application Development and Review

Local applications for Chapter 1 funds are the foundation of program planning and oversight, and SEAs take the application process very seriously. The survey shows that applications have become somewhat streamlined in the past two years, but that contact between SEAs and districts during the application process has become more frequent.

Content of the Application

In several areas, the federal law and regulations specify that local applications must contain an assurance but not necessarily a narrative description. We asked SEAs whether they require descriptions in each of these areas, and the results appear in Table IV-3. In 1989-90, the trend across the board was that more SEAs were requiring descriptions in these areas; two years later, this trend has reversed. In all seven areas, fewer SEAs require descriptions in 1991-92 than in 1989-90. While most of the declines in number of SEAs requiring a narrative are modest, the number of states requiring LEAs to provide narrative descriptions for size, scope, and quality provisions dropped

from 35 to 24. In some areas, however, narrative descriptions continue to be required by a majority of SEAs, most notably in the areas of services planned for private school students (44 SEAs requiring descriptions) and parent involvement (39 SEAs).

Table IV-3

Number of SEAs Requiring Narrative Descriptions in Local Applications, by Area 1988-89, 1989-90, and 1991-92

Area	Number of SEAs Requiring Narrative		
	1988-89	1989-90	1991-92
Services to private school students	46	47	44
Parent involvement	40	44	39
Coordination with regular instruction	25	35	32
Size, scope, and quality provisions	33	35	24
Supplement, not supplant	23	22	18
Coordination with other federal and state programs	11	19	14
Comparability	15	18	13

Table reads: In 1988-89, 46 SEAs required districts' applications to describe the services planned for private school students.

Communication During the Application Process

Contact between SEAs and districts is frequent while local coordinators are completing their applications and while SEA staff members are reviewing the applications. In the 48 states providing data on this subject, 59 percent of Chapter 1 districts contacted their SEAs with questions about the 1991-92 application. Twelve SEAs reported that every district contacted them with questions, and 30 SEAs said that more than half of their districts did so. Even more frequently, SEA staff members contacted districts about problems in their applications. In the 48 responding states, SEAs contacted 68 percent of the districts to discuss problems in their applications. Fourteen SEAs reported that they contacted all of their districts, and 35 said they contacted more than half of their districts. Taken as a whole, these numbers reflect an

increase in contact between SEAs and districts of approximately 10 percent since 1989-90.

Who Reviews Local Applications

SEA Chapter 1 office staff participate in reviewing district Chapter 1 applications in 49 of the 50 states responding and, in 30 states, application review is conducted exclusively by the Chapter 1 staff. In a number of other states, however, SEA specialists from outside the Chapter 1 office also assist in reviewing applications. The most frequent participants are financial specialists, who participate in application review in 17 states. SEA evaluation specialists who are not part of the Chapter 1 office review LEA applications in six states, while SEA curriculum specialists participate in the process in five states.

Monitoring

Frequency of Monitoring

Some recent changes are evident in SEAs' monitoring policies. Monitoring visits, a key vehicle for informing districts of legal requirements and instructional options, tend to be diminishing in frequency as SEAs strive to fulfill their program-improvement responsibilities and to maintain emphasis on all aspects of legal compliance as well. As Table IV-4 shows, an annual monitoring cycle is most common for large and very large districts. However, in an increasing number of states, districts of this size are visited every two or three years; large districts (those with enrollments of at least 10,000 but fewer than 25,000) have experienced the greatest decline in annual monitoring of any enrollment group in the past two years. For medium, small, and very small districts, more states use a three-year monitoring cycle than any other. In addition, a number of states have moved to monitoring cycles of four years or more in their small and very small districts.

Table IV-4

Frequency of Onsite Monitoring,
by Number of SEAs

District Enrollment	Number of SEAs Monitoring Onsite			
	Annual	Every 2 Years	Every 3 Years	Every 4+ Years
Very large (25,000+) (n=38)	22	9	6	1
Large (10,000-24,999) (n=42)	13	12	12	5
Medium-sized (2,500-9,999) (n=45)	8	14	16	7
Small (600-2,499) (n=45)	3	14	17	11
Very small (<600) (n=39)	0	7	20	12

Table reads: Among the 38 responding SEAs that have very large districts, 22 typically conduct monitoring of such districts annually.

When asked if there has been any change over the past two years in the frequency or length of monitoring visits, 22 SEAs indicated that they have reduced their level of monitoring since 1989-90. Eleven SEAs report an increase in their monitoring, and in 17 SEAs there has been no change. Changed emphasis on program improvement and program design has affected the frequency of SEA onsite monitoring more than any other factor, both in those states that have reduced their level of monitoring in the past two years and in those that have increased it (Table IV-5). The SEAs that have modified their monitoring schedules are, in general, ones that devote major attention to program improvement: compared with the SEAs whose level of monitoring has remained stable, program improvement occupies a greater percentage of staff time in SEAs that changed their level of monitoring in the past two years, regardless of the direction of this change. It is likely that many SEAs have reduced their monitoring in order to devote more time to technical assistance (as five SEAs mentioned when elaborating on "other" factors in their monitoring schedules) or to the paperwork associated with program improvement. Other SEAs have apparently stepped up their monitoring as a way of placing emphasis on program improvement.

Table IV-5

Reasons SEAs have Changed the Frequency or Length of Chapter 1 Monitoring Visits

Reason	SEAs Monitoring Less (n=22)	SEAs Monitoring More (n=11)
Changed emphasis on program improvement and program design	16	9
More time spent on other SEA activities	11	-
Reorganization of staff	8	5
Changes in the number of staff	7	3
Changes in budget	4	2
Changes in burden of reviewing applications	3	1

Table reads: Among the 22 SEAs conducting less onsite Chapter 1 monitoring than two years ago, 16 did so at least partly because of changed emphasis on program improvement and program design.

Among those states that have decreased their level of monitoring since 1989-90, half have done so at least partly because of increased time spent on other SEA activities. As examples of such activities they cite those associated with capital expenses, schoolwide projects, and parent involvement. In many cases those states that have cut down on the frequency of monitoring, as well as those that conduct more monitoring than before, have done so because of reorganization of their staff or changes in the number of staff in the state Chapter 1 office. However, money is seldom a critical factor. Only six of 33 SEAs cited a change in budget as a reason for change in the frequency or length of Chapter 1 monitoring visits.

Who Conducts Monitoring Visits

As a rule, SEA staff from the Chapter 1 office are the major participants in monitoring local Chapter 1 programs. However, survey responses indicate that monitoring teams in a number of states may also include individuals from outside the Chapter 1 office. At the top of the list are local administrators, who participate in

monitoring activities in 19 states. SEA staff who are not part of the Chapter 1 office participate in monitoring in 18 states. Volunteered responses reveal that monitoring teams may also include Chapter 1 teachers, parents, and local curriculum specialists, to name a few.

Monitoring Priorities

Despite the general decline in the frequency of monitoring for districts in all size categories, and despite the report by many SEAs that they have reduced their level of monitoring, the SEAs are maintaining or even intensifying the priority they place on virtually every topic in monitoring. We asked SEAs if their monitoring priorities have changed at all in the past two years. With just three exceptions, at least 20 states consider each of the 13 items to be a higher monitoring priority today than two years ago (Table IV-6). In contrast, none of the areas has decreased in priority for a significant number of states. Despite this apparent inconsistency--which is magnified when one recalls that only 11 SEAs claim to have increased the amount of time they spend onsite in districts--a few items stand out as having grown in priority according to a majority of states. Among these areas, identification of schools in need of program improvement and plans to work with those schools are cited by the greatest number (45 SEAs each). Other issues addressed in the Hawkins-Stafford Amendments also have grown in priority in a large number of states since 1989-90, including coordination with the regular instructional program, identification of students not making gains, schoolwide projects, and parent involvement, all of which are cited by at least 34 SEAs.

Table IV-6

Changes in SEA Monitoring Priorities
from 1989-90 to 1991-92, by Number of SEAs

Area	Number of SEAs Giving Area... More Priority	Less Priority	No Change
Identification of schools in need of improvement (n=49)	45	1	3
Plans to work with schools in need of improvement (n=50)	45	0	5
Identification of students not making gains (n=50)	40	0	10
Coordination with the regular instructional program (n=49)	40	0	9
Schoolwide projects (n=49)	36	1	12
Parental involvement (n=48)	34	1	13
Student eligibility and selection of those in greatest need (n=49)	20	2	27
Coordination with other federal and state education programs (n=49)	20	3	26
Other needs assessment issues (n=48)	19	2	27
Evaluation issues not covered above (n=50)	15	4	31
Private school student participation (n=50)	8	1	41
Comparability (n=49)	5	4	40
School attendance area eligibility and targeting (n=49)	1	4	44

Table reads: Forty-five SEAs placed a higher priority on identifying schools in need of improvement during monitoring visits in 1991-92 than in 1989-90.

Federal Monitoring and Technical Assistance

An important administrative responsibility of SEAs involves their relationship with federal Chapter 1 monitors and their ongoing contact with the Office of Compensatory Education Programs (CEP). On average, SEA staff are in contact with CEP close to 30

times each year, including telephone calls and workshops, and 49 of the 50 responding states received a Chapter 1 monitoring visit in the past two years.

Impressions of Federal Monitors

We asked SEAs to rate federal Chapter 1 monitors on six characteristics, which are listed in Table IV-7. As the table indicates, federal monitors scored highest for clearly describing what items they intended to review during their visits; in fact, the issue of clarity stands out as the only one in which a majority of SEAs give high ratings to the monitors. SEAs are more ambivalent when rating federal monitors for their responsiveness, helpfulness, forthrightness in answering questions, and understanding of important issues in the state; however, in each of these areas, the number of states giving federal monitors high ratings greatly outweighs the number of states giving a negative response, with the greatest number of respondents instead choosing a "medium" score.

Table IV-7

SEA Opinion on Federal Chapter 1 Monitors

Area	Number of SEAs Rating Monitors... High	Medium	Low
Clarity of items to be reviewed (n=48)	31	15	2
Overall responsiveness (n=48)	23	23	2
Understanding of Chapter 1 issues in your state (n=49)	20	21	8
Forthrightness in answering questions after review (n=48)	19	26	3
Forthrightness in answering questions on-site (n=49)	19	25	5
Overall helpfulness (n=48)	19	25	4

Table reads: Coordinators in 31 SEAs rate federal monitors "high" for clearly describing what items they intended to review during their visits; 15 rate federal monitors "medium" in this area; and 2 rate them "low."

Perceived Concerns of Federal Monitors

Almost every SEA coordinator (46 of the 48 responding) believes that federal Chapter 1 monitors are concerned with compliance issues during their onsite monitoring visits, while fewer than half (21 of the 48 responding) feel that monitors are concerned about the quality of the Chapter 1 instructional programs when they visit. SEAs are sharply divided in their assessment of whether federal monitors are more concerned with "significant" or "minor" compliance issues during their visits. Thirty-three coordinators believe that federal Chapter 1 monitors are concerned with minor compliance issues, including 15 who say monitors are not concerned with significant issues. On the other hand, 31 coordinators believe that federal monitors are concerned with significant compliance issues, including 13 who say these monitors are not concerned with minor issues.

SEAs' increased emphasis on program improvement is echoed in their impressions of federal monitoring concerns. All 47 responding SEAs indicated that program improvement is a concern of federal monitors during their onsite visits. On the other hand, 25 SEAs indicated that the transition of young children into school--another issue that has received considerable attention from CEP--is a concern of federal monitors.

Contact with CEP

Including telephone calls and workshops, SEA staff are in contact with the Office of Compensatory Education Programs (CEP) an average of 29 times per year. From state to state, the frequency of such contact varies tremendously. At the upper extreme, 13 SEAs are in contact with CEP at least 40 times per year, including one SEA that converses with CEP staff 100 times per year, or once every two or three working days. On the other hand, 15 states limit their contact with CEP to no more than one conversation per month.

In general, CEP leadership and staff receive high ratings from SEAs. In situations other than monitoring visits, CEP generates a positive response in each of four categories from a majority of states (Table IV-8). At the top of the list is CEP's forthrightness in answering questions, which 31 state coordinators commend. Notably, in

each of the remaining three areas--clarity of information provided, availability of staff, and willingness to explore options--CEP is rated more highly among those SEAs with which it is in contact the most (at least 25 times per year).

Table IV-8

SEA Rating of CEP Leadership and
Staff in Situations Other than Monitoring Visits

Area	All SEAs (n=50) Number of SEAs Rating CEP... High	Medium	Low	Frequent-contact SEAs (n=26)* Number of SEAs Rating CEP... High	Medium	Low
Forthrightness in answering questions	31	16	2	15	8	0
Clarity of information provided	29	18	2	15	7	1
Availability of staff	29	15	6	20	2	2
Willingness to explore options	26	20	4	16	7	1

* SEAs that are in contact with CEP at least 25 times per year.

Table reads: Among all responding SEAs, 31 rate CEP "high" for its forthrightness in answering questions; 16 rate CEP "medium" in this area; and 2 rate it "low." Among the 26 SEAs that are in contact with CEP at least 25 times per year, 15 rate it high for its forthrightness in answering questions; 8 rate it medium; and 0 rate it low.

TACs and RTACs

For districts attempting to improve their Chapter 1 programs, Technical Assistance Centers (TACs) and Rural Technical Assistance Centers (RTACs) can be a useful resource, according to SEA coordinators. In 1991, the state coordinators believed that TACs and RTACs made their greatest contribution to local Chapter 1 programs in the area of planning school program improvement. In 30 states TACs and RTACs reportedly made a "major" contribution to districts in this area, and in 14 states they made "some" contribution (Table IV-9). Other areas in which state coordinators think TACs and RTACs made an especially significant contribution include evaluation issues, teaching more advanced skills, measuring NCE gains, and coordinating Chapter 1 with regular instruction.

Table IV-9

Perceived Level of TAC and RTAC
Contribution to LEAs in 1990-91

Area	Number of SEAs Rating Contribution... Major	Some	None	No Assistance Requested
Planning school program improvement (n=49)	30	14	2	3
Implementing school program improvement (n=48)	23	17	4	4
Evaluation issues (n=49)	22	21	1	5
Teaching more advanced skills (n=49)	22	20	2	5
Coordinating Chapter 1 with regular instruction (n=49)	19	22	2	6
Measuring NCE gains (n=48)	19	20	2	7
Parental involvement (n=49)	18	27	2	2
Measuring progress toward desired outcomes (n=47)	15	23	4	5
Setting desired outcomes (n=49)	14	28	3	4
Joint SEA/LEA program improvement (n=47)	13	16	7	11
Schoolwide project evaluation (n=48)	12	17	1	18
Student program improvement (n=47)	6	22	8	11
Coordinating Chapter 1 with other special programs (n=49)	5	25	7	12

Table reads: Coordinators in 30 SEAs reported that TACs and RTACs made a major contribution to LEAs in the state in 1990-91 in the area of planning school program improvement.

The Chapter 1 Policy Manual

In dealing with the new provisions of the Hawkins-Stafford amendments, the Chapter 1 Policy Manual is a resource that is frequently used and highly regarded, according to state coordinators. All states use the manual to some extent, and 40 SEAs

refer to it often. Thirty-two coordinators rate the manual "high" for its overall helpfulness; 30 give it high marks for its clarity; and 24 score it high for completeness (Table IV-10). In none of these areas does the manual receive a "low" rating from any state. The only area in which medium ratings outnumber high ratings is that of completeness, suggesting that a lengthier manual might be well received.

Table IV-10

SEA Opinions about the Chapter 1 Policy Manual

	Number of SEAs Rating Manual...		
Area	High	Medium	Low
Overall helpfulness (n=49)	32	17	0
Clarity (n=50)	30	20	0
Completeness (n=50)	24	26	0

Table reads: Thirty-two SEAs rate the Chapter 1 Policy Manual "high" for its overall helpfulness; 17 rate it "medium"; and 0 rate it "low."

The Chapter 1 Policy Manual is an important resource for information about the law's provisions for program improvement (Table IV-11). Thirty-two of 47 responding state coordinators consider the chapter on program improvement to be one of the manual's three most useful; only two SEAs indicated that it is one of the three least useful chapters. Chapters on schoolwide projects and evaluation were also frequently cited as being especially useful.

When asked which chapters in the manual are the three least useful, the greatest number of SEAs (31) selected the chapter on grantbacks. Of the 18 SEAs that indicated the grantbacks chapter is the single-least-useful chapter in the manual, all said they felt this way because the issue of grantbacks is one that raises few concerns for them; thus, they have little need for the information provided. In general, chapters in the manual that SEAs consider not useful are selected for this reason--the topic is one in which the SEAs have few concerns. Only in a few cases did an SEA indicate that a chapter in the manual was either incomplete, unclear, or contradictory with other available information.

Table IV-11

Most- and Least-Useful Chapters in the Chapter 1 Policy Manual, According to State Coordinators

Chapter	Number of SEAs Rating Chapter... Top-3 Most Useful (n=47)	Top-3 Least Useful (n=42)	Single-least Useful (n=41)
Program Improvement	32	2	0
Schoolwide Projects	18	6	2
Evaluation	17	0	0
Fiscal Requirements	12	2	0
Services for Private School Children	11	5	2
Eligible Schools	10	1	0
Parental Involvement	9	0	0
Uses of Funds	8	2	1
Eligible Children	7	0	0
Assignment of Personnel	6	7	0
Reallocation	3	3	0
Education Department General Administrative Regulations	3	11	3
Carryover	2	5	1
Assurances and Application	1	5	0
Basic Grants	1	8	3
State Administration	0	9	0
Concentration Grants	0	13	6
General Education Provisions Act	0	14	5
Grantbacks	0	31	18

Table reads: Thirty-two out of 47 SEAs rate the Chapter 1 Policy Manual's chapter on program improvement among its top-three most-useful chapters.

Perceived Necessity and Burden of Requirements

We asked SEA coordinators to judge which of 11 categories of legal requirements are, first, the most necessary for attaining the objectives of Chapter 1 and, second, the most burdensome. As was the case in 1989-90, the law's targeting provisions rank highest in perceived necessity, with needs assessment procedures edging out provisions for ranking and selecting students at the top of the 1991-92 list (Table IV-12). The requirements for parent involvement, ranked seventh in necessity in 1989-90 and fourth in 1991-92, showed the greatest increase in perceived necessity during the two years between surveys.

Table IV-12

Overall Rankings of Chapter 1 Requirements
by Perceived Necessity and Burden*
1989-90 and 1991-92

Category of Requirements	Rank on Necessity 1989-90	Rank on Necessity 1991-92	Rank on Burden 1989-90	Rank on Burden 1991-92
Needs-assessment procedures	2	1	3	3
Ranking and selecting students	1	2	5	5
Ranking and selecting project areas	3	3	8	9
Parent involvement	7	4	6	8
Evaluation procedures	5	5	2	2
Supplement, not supplant provisions	4	6	9	6
New provisions for program improvement	8	7	1	1
Size, scope, and quality provisions	6	8	11	10
Private school student participation	9	9	7	7
Comparability procedures	10	10	4	4
Maintenance of effort provisions	11	11	10	11

* Based on an average of all respondents' ratings.

Table reads: Responding to a list of 11 categories of requirements, SEA coordinators ranked needs-assessment procedures second in necessity for attaining the objectives of the Chapter 1 program in 1989-90 and first in necessity in 1991-92; SEA coordinators ranked needs-assessment procedures third on burden in both years.

With 27 SEAs ranking them either first or second, the requirements for program improvement are, once again, perceived by state coordinators as the most burdensome of the eleven. In fact, the 1991-92 list closely resembles the 1989-90 list, with the same five items ranked one through five in burden.

Summary

This chapter has described SEAs' procedures and priorities in carrying out their regular administrative functions. It places the provisions of the Hawkins-Stafford Amendments in the perspective of all the other program provisions that SEAs deal with in carrying out these functions. It also describes changes in the procedures and priorities of SEA administrative activities in the two years since our 1989-90 survey of the state coordinators. The major findings, by area of administrative practice, are as follows:

Staffing

- Across the board, the number of SEA full-time equivalent staff members working on Chapter 1 matters has increased by 11 percent since 1989-90, with generalists still outnumbering specialists by almost two to one.
- Only three state coordinators believe that current staffing in their offices is adequate; all the rest point to barriers--most often a state hiring freeze or low state salaries--that have limited their ability to staff the way they would like.

Application Development and Review

- Between 1989-90 and 1991-92, there has been a decrease in the number of SEAs requiring narrative descriptions in each of seven areas of the application; nonetheless, in a few of these areas, such as plans for services to private school students and parent involvement, the vast majority of states still require a description on the application.
- Most districts (59 percent) contact their SEAs with questions while preparing their applications, and SEAs in turn contact most districts (68

percent) due to problems appearing on the applications. Both of these figures represent an increase from 1989-90 of approximately 10 percent.

Monitoring of LEAs

- The frequency and intensity of onsite monitoring varies across states for districts of the same general enrollment size. The largest number of SEAs monitors districts enrolling 10,000 or more students annually, although districts in the 10,000-24,999 range are increasingly being monitored in cycles of two years or more. In smaller districts, states use a three-year monitoring cycle more than any other. A monitoring cycle of four years or more, previously a rarity, is found in an increasing number of states.

- Twenty-two SEAs have reduced the frequency or length of their monitoring visits in the past two years; 11 SEAs conduct more monitoring in 1991-92 than in 1989-90. Among those SEAs that have changed their level of monitoring in either direction, most have done so at least partly because of a changed emphasis on program improvement and program design.

- Paradoxically, SEAs insist that the priority they place on substantive topics in monitoring has not diminished. Most SEAs even claim to have increased their attention to six areas addressed in the Hawkins-Stafford Amendments, especially identification of schools in need of improvement and plans to work with these schools. A majority of SEAs report no change in the priority accorded to seven other areas traditionally emphasized in monitoring, such as targeting, needs assessment, and participation of private school students.

- Among the people conducting monitoring visits in 19 states are local administrators; in 18 states, SEA staff members from outside the Chapter 1 office participate in monitoring.

Federal Monitoring and Assistance

- SEAs in 49 of 50 states received a federal Chapter 1 monitoring visit in the past two years. A majority of SEAs give high ratings to federal Chapter 1 monitors for clearly describing what items they intend to review. However, in all other areas, federal monitors are more likely to receive a medium ranking than a high one.

- Including telephone calls and workshops, SEA staff are in contact with the Office of Compensatory Education Programs (CEP) an average of 29 times per year.

- In non-monitoring situations, CEP receives a high rating from a majority of states for being forthright in answering questions, clearly providing information, being willing to explore options, and having available staff.

- SEAs report that in 1991, Technical Assistance Centers (TACs) and Rural Technical Assistance Centers (RTACs) made a major contribution to districts in 30 states in the area of planning school program improvement. Other areas in which TACs and RTACs are thought to have made a significant contribution include evaluation issues, teaching more advanced skills, measuring NCE gains, and coordinating Chapter 1 with regular instruction.

- The Chapter 1 Policy Manual is read often by SEAs and regarded highly. The manual's chapter on program improvement is considered one of the three most useful by the greatest number of SEAs (32). Thirty-one SEAs consider the chapter on grantbacks to be one of the least useful, primarily because it addresses an area in which few concerns arise.

Necessity and Burden of Requirements

- Asked for their opinions on the necessity and burden of each of 11 Chapter 1 requirements, SEA coordinators ranked needs assessment procedures highest in necessity; they ranked the provisions for program improvement highest in burden, just as they had in 1989-90.

V. CONCLUSIONS

In their third year of implementation, the Hawkins-Stafford Amendments to Chapter 1 have had noticeable effects on a program of great underlying stability. The program has absorbed the new provisions into its standard operating procedures, and the effects are apparent--though not dramatic--in SEAs, districts, and schools. We review here some of the major effects reported by SEA coordinators in their responses to this late-1991 survey.

Thousands of Chapter 1 schools were engaged in some stage of the process of program improvement in 1991-92. The SEAs reported that 6,439 schools were in the process of implementing improvement plans. The second year of school identification (based on performance data from 1989-90) resulted in identifying 6,657 schools as in need of improvement, representing an increase of 31 percent over the number identified in the first year.

Almost half the states now identify some schools for program improvement that have NCE gains greater than zero (e.g., the states that have a cutoff point of one NCE). Thirty have required the use of desired outcomes other than NCE gains in the identification process. Data on the proportion of schools identified in each state indicate that a higher NCE standard is associated with the identification of more schools, but that a state requirement on other desired outcomes is not. Committees of practitioners have changed their stance on standards for school identification; the committees in 29 states were advocating higher standards in the fall of 1991, whereas only 17 did so initially.

Although the numbers of schools identified in each year seem to be creeping upward, and 1,519 schools have been in the improvement pipeline long enough that they are currently subject to the requirement for joint state-local improvement plans, in fact identification for program improvement can be transitory. The SEAs estimate that, overall, 50 percent of identified schools find that their student performance rises enough after a planning year that they are no longer identified for improvement. According to the law, these schools are not obliged to carry out their improvement plans, although they may of course choose to do so.

The survey responses of SEA coordinators reveal widespread local concern about the procedures for setting standards, identifying schools as in need of improvement, and developing improvement plans. The actual job of improving is reported to be a less widespread concern--reflecting the fact that many schools are able to leave the mandated process after a planning year.

According to the coordinators, school improvement is on more or less the right track except for the major problem that SEA staff and, to a lesser extent, local staff are unable to devote enough time to it. If these problems could be corrected, most coordinators perceive that only minor problems would remain. These would include limited local skill in program improvement, limited funds, and local resistance. The coordinators do not feel that inaccuracies in school identification pose much of a barrier to improvement. Furthermore, most of them think that the outside technical assistance now available is adequate to meet schools' improvement needs (with the exception of SEA technical assistance, which they think should be increased).

Survey responses from SEA coordinators are not the ideal source of information on the scope of the improvement process, but they provide a few indications that its scope is small. For example, the amount of Section 1405 funds typically awarded for each identified school is around $2,500. Grants of this size, while never intended to cover the full cost of school improvement, send a signal that is very different from the grants associated with other improvement initiatives. For example, schools that are grantees in the RJR Nabisco Foundation's Next Century Schools Program receive six-figure sums for each of three years.

Similarly, the scope of most SEAs' participation in joint state-local plans is far smaller than one would imagine for a serious improvement initiative--consistent with the coordinators' complaint that limits on SEA staff time are impeding school improvement. The median number of days SEA staff members are expected to spend this year in each school implementing joint plans is two or three. Moreover, the three SEAs with the most ambitious expectations in this regard (i.e., more than 10 SEA-person days per school) are those that are not yet facing the reality of schools with joint plans.

Turning to other areas of statutory change introduced by the Hawkins-Stafford Amendments, we find a similar pattern of gradual, nondramatic change in practice. For

example, committees of practitioners are increasingly involved in giving advice on state rules and policies compared with two years ago. The composition of the committees has changed little, however; they still include a high proportion of local administrators, and parents have in fact shown a decline in representation. Another example of change is the continued increase in the number of schoolwide projects--from 621 two years ago to 1,712 this year--although this is still just 29 percent of all eligible schools. The number of districts operating innovation projects has doubled over two years but remains less than 2 percent of all districts. All forms of parent involvement are reported to be increasing, but Chapter 1 parent-teacher conferences are still the dominant means of involving parents.

The SEA Chapter 1 offices are trying to do justice to a complex program with what they consider inadequate staff resources. Relatively few coordinators blame federal funding levels for this state of affairs; instead, they are more likely to cite state-level policies such as hiring freezes or low salaries that impede the hiring of the best qualified staff. Within these limitations, coordinators are staffing their Chapter 1 offices in much the same way as in past years; growth has been in the 15-20 percent range in both generalists and specialist positions (although there has been a boomlet in evaluation specialists, who now number 41 full-time equivalents in SEA Chapter 1 operations nationwide).

These modest staffing increases are reflected in a somewhat increased frequency of contact with districts during the application process, compared with two years ago. SEA offices now field inquiries from 59 percent of districts during application preparation, and they in turn contact 68 percent of districts to raise questions about the submitted applications. In onsite monitoring, traditionally a key responsibility of SEA Chapter 1 offices, 22 SEAs report a decrease in the frequency or intensity of monitoring, while 11 say it has increased. Despite these figures, which are consistent with data showing an overall decrease in the frequency of visits to districts of various sizes, the SEAs are endeavoring to maintain and even increase a focus on virtually every substantive aspect of monitoring. They report an increased priority on procedures that were part of the Hawkins-Stafford Amendments, such as program improvement and

accountability; moreover, the reported priority of perennial issues such as student targeting remains undiminished.

In response to a series of questions about interactions with federal officials in monitoring visits and other contexts, the SEAs generally praise these officials. They give high ratings to federal monitors for clarity about what items they will review during visits; they give them moderately high ratings on other dimensions of responsiveness and helpfulness. Based on an average of 29 contacts per year between their staffs and the Office of Compensatory Education Programs (CEP), SEA coordinators express considerable satisfaction with CEP's responsiveness and clarity. Similarly, the coordinators have almost no complaints about the Chapter 1 Policy Manual.

Finally, coordinators' perceptions of the relative importance of several areas of Chapter 1 requirements, and of the burden associated with each area, have changed somewhat over the past two years. On average, coordinators consider the requirements for needs assessment to be the most necessary ones for attaining the program's objectives, closely followed by student selection. (The order of these two areas was reversed two years ago.) Parent involvement is now ranked higher in perceived necessity, rising from seventh place to fourth on the list of 11 areas. The new provisions for program improvement rank fairly low on perceived necessity (seventh on the list, rising from eighth two years ago) but continue to rank first in perceived burden. This is consistent with the coordinators' estimate that a substantial amount of their staff time--a median of 27.5 percent--goes into program improvement.

A capsule summary of our findings is that SEAs and districts are, for the most part, faithfully carrying out the law's requirements, but that the degree of change the amendments have effected in Chapter 1 is far from revolutionary. Two reasons stand out for this state of affairs. First, the procedural approaches to reform spelled out in the Hawkins-Stafford Amendments simply do not ensure substantive educational improvement; it is possible to work very hard to comply with the law and still do very little of educational value. Clearly, considerable state and local energy has gone into clarifying and meeting the standards for student performance, resulting in a mandated improvement process that affects a relatively small number of Chapter 1 schools.

Second, staff resources commensurate with large-scale change have not been brought to bear on making Chapter 1 a better program. Hampered by state policies such as hiring freezes and low salaries, virtually all the SEA coordinators have been unable to staff their offices the way they would like to. Whether by choice or necessity, their capacity to exercise leadership in the Chapter 1 program remains hemmed in by the routine tasks of program administration. Application review and monitoring continue to claim a large share of SEA staff time. Program improvement is reportedly time consuming for SEAs, but the schools that arguably need SEA help the most--those implementing joint state-local plan few person days of onsite help. With so many procedural responsibilities to carry out, including the new ones added by the Hawkins-Stafford Amendments, SEAs have only limited opportunities to lead the Chapter 1 program in new educational directions.

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