

Losing Patience with Chronically Low-Performing Schools: How to Improve School Improvement

A Public Hearing at Howard University, Blackburn Center Ballroom

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COMMISSION ON
NO CHILD LEFT BEHIND
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One of the toughest challenges in public education is how to help students trapped in chronically low-performing schools—those that continually fail to make adequate yearly progress under the No Child Left Behind Act (NCLB, the most recent version of the Elementary and Secondary Education Act or ESEA), and many of which have failed generations of students. There are a wide variety of approaches to tackling this problem, ranging from relatively minor interventions, such as hiring an outside expert or implementing a new curriculum while offering tutoring and transfer opportunities for students, to replacing staff or closing and replacing the school. While there is emerging consensus on the common characteristics of successful schools, there is less of a consensus on how to instill those elements where they are lacking. Most people agree that there is no “silver bullet” solution and that no one

strategy works for every school or every situation. Finding the right approaches or menu of solutions for schools in need of improvement remains a significant challenge, and one that a reauthorized ESEA will need to address.

“If [parents] were every day sending kids to a school which was starving them physically ... there’d be an uprising. But the fact that we’re starving them academically in many of these schools ... goes unquestioned.”

*—Commissioner Michael Lomax,
President and CEO, UNCF*

The Aspen Institute’s Commission on No Child Left Behind held the first in a new series of public hearings at Howard University, a school with a rich history of working to promote education equality. Indeed, the roots of the landmark Supreme Court case, *Brown vs. Board of Education of Topeka, Kansas*, lie on the campus of Howard’s Law School. There, Howard alumni, faculty members, and administrators,

including Thurgood Marshall, who argued the case before the Court, and Charles Hamilton Houston, then Dean of the Law School, conducted legal research and practiced arguments in the case, which determined that racial segregation in public schools is unconstitutional.¹ Almost sixty years later, the work to spread educational opportunity continues at Howard and around the country.

Witnesses at the hearing shared their experiences with school improvement at the school, district, state, and community levels, giving Commissioners a clearer sense of the commonalities of effective school improvement efforts and the challenges of doing this work at scale. The hearing was broadcast live on C-SPAN; to view a complete video of the proceedings, visit <http://www.c-spanvideo.org/program/288658-1>. To access the witnesses’ testimonies, visit <http://www.aspeninstitute.org/events/2009/09/02/hearing-losing-patience-chronically-low-performing-schools>.

As it develops updated recommendations on these issues for the upcoming reauthorization of ESEA, the Commission will continue to examine information on this and other topics from a variety of sources,

including testimony at future hearings, written comments sent to the Commission, quality research, and discussions with experts and stakeholders. To provide comments for the Commission’s consideration, please visit www.nclbcommission.org and select “Your NCLB Comments.”

Emerging Issues

- ›› The individual school—not the school system—is the “unit” of reform.
- ›› Incremental change is not enough—improvement must be significant.
- ›› Strong, empowered leadership and effective teachers are critical elements of successful schools and turnaround efforts.
- ›› Schools must have a coherent vision for teaching and learning—and all stakeholders must align their decisions and actions with that vision.
- ›› School leaders and administrators need more flexibility and autonomy to accompany strong accountability.
- ›› All stakeholders need to be held accountable for school improvement.
- ›› School improvement must happen in tandem with other reforms—like high-quality pre-service teacher training and purposeful, focused professional development—to help schools make and maintain progress.
- ›› Business and community partnerships can make a difference when there is meaningful, strategic engagement aligned to the school’s mission and goals.
- ›› Although school performance data is now widely available, we are not doing enough to communicate its meaning to parents and the public.
- ›› School, district, and state capacity for reform is a challenge that must be addressed, but it should never be an excuse for inaction.

Highlights from Witnesses’ Testimony

Successful school turnarounds—those that take a school from bad to great—are not common. Restructuring or closing and replacing failing schools has proven to be difficult. At the hearing, Commissioners heard from six leaders who are actively engaged in this challenging work—and succeeding.

State level

Dr. Ronald Peiffer, Maryland Deputy State Superintendent, shared lessons that the state has learned through its work in identifying and intervening in low-performing schools: small-scale interventions, weak monitoring, and the “dance of the lemons” that results from “zero-based staffing attempts” do not work. Though Maryland’s school improvement efforts predated NCLB, the law’s generation of abundant data and identification of a much larger number of schools for improvement led to recognition of the need to focus school interventions more carefully. Participation in the U.S. Department of Education’s

Witnesses Who Testified

- >> **Dr. Ronald Peiffer**, Maryland Deputy State Superintendent, Baltimore, MD
- >> **Mr. Garth Harries**, Assistant Superintendent for Portfolio and Performance Management, New Haven, CT
- >> **Mr. Michael Contompasis**, Senior Field Consultant, Mass Insight School Turnaround Strategy Group, Boston, MA
- >> **Ms. Phyllis Lockett**, President and CEO, The Renaissance Schools Fund, Chicago, IL
- >> **Ms. Natalie Elder**, Principal, Hardy Elementary School, Chattanooga, TN
- >> **Mr. Steve Barr**, Founder and Chairman, Green Dot Public Schools, Los Angeles, CA

Differentiated Accountability pilot (begun in 2008), enables Maryland to apply fewer and “less pejorative” labels to schools, to better tailor interventions to schools’ varied needs, and to triage state involvement in troubled schools depending on the severity, pervasiveness, and persistence of problems. Peiffer believes states should be given more latitude to develop customized interventions for schools without regard to the NCLB intervention schedule that sometimes has the effect of delaying needed changes in schools.

Last year, a total of 32 middle and high schools successfully exited restructuring in Maryland—a feat Peiffer partly attributes to the state’s unique requirement that local superintendents defend their restructuring plans before the State Board of Education, and to the state’s assessment and audit tools that help schools assess and remedy the root causes of failure. Peiffer also emphasized the importance of teacher quality in turning around low-performing schools, noting that differentiated professional development is essential and that measuring teacher and principal effectiveness is a “good new direction.” Leadership is another essential element, and one on which Maryland has taken a lead. The state has the nation’s only Division of Leadership Development, and annually trains and supports new principals through a Principals Academy.

District level

Garth Harries, New Haven, Connecticut’s recently appointed Assistant Superintendent, testified about his experience in implementing New York City’s “New Schools Strategy,” a large-scale initiative to close and replace failing schools in order to build a system of great individual schools—as opposed to a great school system. According to Harries, new schools now make up about a quarter of the city’s schools, and about half of high schools and are achieving strong gains that are lifting the overall system’s performance. Harries urged Commissioners “not to think soft on school improvement,” stating that “school turnaround, or reconstitution, or closure and new schools, or whatever we call it, should not be a rare or exceptional intervention.” Indeed, the New Schools Strategy involved reconstituting the lowest-performing schools in the city’s “portfolio” on a regular schedule each year—usually before any mandated action under NCLB. Harries noted that by giving many chances for improvement, NCLB does not support this kind of “hardheaded” approach; he urged that the law be amended to encourage school reconstitution as part of the ongoing performance management of a district.

“Skittishness about reconstituting schools—the pervasive national desire to give adults another chance—gets in the way of making the immediate decisions we should on behalf of students.”

—Garth Harries,
Assistant Superintendent, New Haven, CT

The most important common feature among New York City’s new schools, said Harries, is coherence of their school plan and capacity of the school’s leadership, including teachers, to unify around the plan. He called for policymakers at the district and federal levels to support, encourage, and facilitate that coherence and “consistent execution... of one good approach” rather than a “multiplication of programs and interventions.” The city provides a strong support structure for school planning teams during the phase-out and phase-in process, as well as a more flexible but accountable “autonomy zone” to support successful execution.

State and local level

Michael Contompasis, a Senior Field Consultant at Mass Insight School Turnaround Strategy Group in Boston, agreed that the “light-touch” approaches of the past were ineffective because they did not address underlying system failures and operating conditions and usually involved the provision of a multitude of disconnected services. While NCLB provides a useful foundation for determining which schools are meeting students’ needs, Contompasis believes that the law has failed to catalyze improvements in the absence of adequate support and the political will to undertake major change. He highlighted three central issues that need to be addressed to maximize the law’s impact: shortening the time to reach intensive action, closing the “other major restructuring” loophole, and allowing states to differentiate their accountability systems to combat the watering down of restructuring plans because of capacity constraints.

Contompasis identified the critical elements of any school turnaround effort (see sidebar for details) and made recommendations for comprehensive state turnaround initiatives, including: recognize that the change required cannot be made incrementally, but rather must be fundamental and dramatic; recognize turnaround as a discipline in need of experts; change school operating conditions by creating protected “zones” where leaders have the authority to make wide-ranging mission-directed decisions and skirt common barriers like inflexible contract and compliance requirements; and cluster turnaround efforts so that schools can operate as flexible networks but also achieve economies of scale.

Community level

Phyllis Lockett, the President and CEO of the Renaissance Schools Fund (RSF) in Chicago, provides strategic, implementation, and fundraising support to the school district’s “Renaissance 2010” (Ren10) initiative, a public-private partnership that creates new schools in high-need communities where most schools perform below state standards. So far, 63 charter schools have opened after completing a rigorous selection process and receiving up to \$500,000 in start-up funds, and the schools are

Common Elements of Successful Schools

Witnesses agreed that successful schools have and successful turnarounds require:

- ›› A culture of high expectations
 - ›› Strong leadership and effective teachers
 - ›› A staff that uniformly believes students can achieve
 - ›› Clearly defined authority and protection to make mission-directed decisions on staffing, budget and other decisions
 - ›› A coherent school vision and goals with buy-in from all stakeholders
 - ›› A strong focus on using data to inform decisions
 - ›› Strategic partnerships with business, community leaders, and institutions of higher education focused on the school’s mission and goals
 - ›› Performance-based expectations for all stakeholders
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performing at an average of 17% above district averages. Modeled after high-performing charter schools, the new Ren10 charter schools offer challenging curricula and longer instructional time to students and give school leaders control over human capital decisions, schedule, and budgets, while being held accountable through five-year performance contracts. RSF has also created capacity-building programs to develop a pipeline of new school entrepreneurs, support the growth of strong schools through business planning and technical assistance, and educate parents about their options—a particularly important endeavor given the results of a recent survey showing a “widespread lack of awareness of the trouble state of public schools” in Chicago.

According to Lockett, the success and boldness of the Ren10 initiative has attracted a diverse array of new partners who are investing “time, resources, and thought leadership in the reform of public education.” “We have been able to infuse the unique intellectual capital of leading innovators from the corporate, education, and non-profit sectors to launch unprecedented new schools,” she said. Examples of innovative new Ren10 schools include: the city’s first all-boys public high school; the first expeditionary learning schools; and a school launched by Perspectives Charter Schools, Motorola, and the Illinois Institute of Technology that prepares students for college and/or a career in the sciences. Lockett reported that the Chicago school district is beginning to incorporate Ren10 best practices district-wide, launching expanded instructional time for high school freshmen, allowing schools to operate year-round, and granting high-performing traditional schools greater freedom in exchange for autonomy.

“The mindset of how we viewed ourselves, students, parents and the community was pivotal in reaching our goal of ‘excellent, not average.’”
—Natalie Elder, Principal, Chattanooga, TN

School level

Chattanooga principal Natalie Elder demonstrated the importance of strong leadership—which she defined as the capacity and will of a leader to move people toward a common goal—in school improvement. Elder explained how she turned Hardy Elementary School—a “dysfunctional

learning community” where the mentality of teachers was defeat—from one of the lowest-performing schools in Tennessee to one of its most-improved. With a goal of “excellent, not average,” Elder’s approach was to reenergize the school by developing a clear vision, reconstituting the staff and providing targeted professional development to build a more effective faculty, continuously utilizing data to measure growth and progress, building strong leadership teams, encouraging collaboration, changing expectations of student behavior, and adapting the curriculum to emphasize literacy. Noting the importance of strong collaboration in promoting students’ success, Elder stated, “College begins in kindergarten. The parents’ job is to discipline, and our job is to educate—we have to work together. The only pathway out of poverty is through education. Getting them to become productive citizens—that can’t involve just teachers.”

While Hardy made significant student achievement gains over the past eight years under Elder’s leadership, the school did not make “adequate yearly progress” in math this year. Elder and her team took this as a call to action, and immediately developed a plan to remedy the deficiency. Teachers are meeting individually with students to determine how best to help them reach achievement goals, instructional time and formative assessments in math have been increased, and the entire staff is engaged in reviewing data and searching for ways to improve.

Steve Barr, Founder and Chairman of Green Dot Public Schools, a Los Angeles charter school operator, testified about Green Dot’s experience in taking over management of the city’s notorious Alain Leroy Locke High School—a school intended to bring hope to a community devastated by the Watts riots but that instead became one of the city’s worst schools. In fall 2008, Green Dot transformed Locke into eight small college-prep academies known as the “Locke Family of High Schools”—a model the organization believes can be used to improve failing schools throughout the district and beyond—and made a host of immediate changes. Teachers were required to reapply for their jobs, students had to wear uniforms and abide by a strict discipline code, and the school’s campus was cleaned up. Each of the schools has its own culture and focus but embodies the “Six Tenets” of the Green Dot model: small, safe, personalized schools; high expectations for all students; autonomy for principals and teachers regarding budgeting, hiring, and curriculum with extensive professional development and accountability; required parental involvement; maximum funding to schools (schools keep 94% of public funding, with 6% going to Green Dot as a management fee for providing back-office support functions); and keeping facilities open later as a safe place for children and for community involvement. Green Dot also provides its schools with “Recommended Practices,” best practices that are required for schools that miss their achievement targets but optional at other schools. (Schools that choose other practices, however, must justify those in a research- and evidence-based plan.)

Barr stressed the importance of “gathering the tribes” to find common ground among those who disagree about how to improve schools. He noted that in improving schools, all of the “tribes” agree on about 70% of the issues—and argued that is the 70% that turnaround should focus on. He said, “We need to start with the premise that all adults in the building believe that all kids can learn.” From there, he said, we need to use data to improve schools—not scapegoat them.

Witnesses’ Recommendations for Improving School Improvement under NCLB

Increase autonomy and remove barriers to reform

- Give states more latitude to develop customized interventions without regard to a federal timeline.
- Mandate that states prioritize the needs of their schools.
- Set a specific and varied menu of reform actions for schools to choose from, but remove the non-specific “other” option.
- Increase autonomy in exchange for accountability.
- Provide incentives for the creation of protected “zones” that enable leaders to make mission-directed decisions and dismantle common barriers to action.

Take significant action

- Encourage regular school reconstitution as part of the ongoing performance management of a district.
- Intensively intervene early in the lowest-performing schools, rather than delaying reform in adherence to the law’s school improvement timeline.
- Support only the most rigorous interventions.

- Create incentives for states and districts to close low-performing schools and replace them with better options.

Allocate resources strategically

- Support coherence of school plans by integrating funding streams with competing requirements.
- Provide funds only to those districts and states that have the political will and commitment to fully implement transformation.
- Allow federal school improvement resources to support new school planning and implementation.
- Ensure that Title I-eligible secondary schools receive their fair share of funds and support.
- Ensure that school improvement funds are provided for at least three years.
- Support state capacity through a dedicated 5% allocation.

Build school and district capacity

- Provide pragmatic support in building new school organizations, whether turnarounds or new schools.
- Support the development and application of specialized turnaround capacity within schools and districts and among external partner organizations.
- Undertake turnarounds in clusters organized around identified needs.

Implement other policies

- Support the growth of quality charter school networks and authorizers.
- Incentivize districts and communities to form strategic partnerships with the private sector.
- Support efforts to help parents become strong advocates for their children’s needs.
- Expand the use of growth models and formative assessments.

For Further Discussion

The Commission is seeking further comments from interested individuals and organizations on these topics:

- Are autonomy and flexibility rewards for doing well or tools to facilitate improvement—or both? When, how, and to whom should they be granted or revoked?
- Under what circumstances is a timeline for improvement helpful in ensuring that change happens quickly rather than incrementally? When is a timeline an impediment to acting swiftly on behalf of students in failing schools?
- Under what circumstances is a school worth rehabilitating? When should it be closed?
- Given the prominent role of charter schools in providing new options for students, what policy levers are most important to ensure success?
- How can we ensure that students have options during times of school transition or closure and beyond?

- How can we ensure that the needs of English language learners and students with disabilities are addressed in school improvement?

Comments may be submitted via the Commission’s website, www.nclbcommission.org (select “Your NCLB Comments”).

The Current School Improvement Landscape

In school year 2008-2009, more than 12,000 public schools in the United States (roughly 12%) did not make Adequate Yearly Progress (AYP) under NCLB, including over 5,000 schools in the planning or implementation phase of restructuring, the consequence reserved for schools that have missed AYP for five or more consecutive years.ⁱⁱ This represents a large increase from just two years before, when the U.S. Department of Education (the Department) reported that only 2,302 schools were in the process of restructuring.ⁱⁱⁱ

Good data are often hard to come by: the number of schools successfully emerging from “restructuring” is not being tracked nationally, and the Department has to rely on school, district, and state-reported data, which, although improving, is often incomplete and inaccurate. According to the Department, few Title I schools in restructuring status in 2006-07 reported experiencing any of NCLB’s restructuring options (detailed below).^{iv}

New Pilot Initiative – After Congress failed to reauthorize NCLB on time in 2007, the Department began to take administrative steps to improve the law where possible. Between July 2008 and January 2009, nine states were chosen for a “Differentiated Accountability” pilot initiative aimed at helping states develop more nuanced accountability systems that better distinguish between schools in need of dramatic interventions and those that are closer to meeting achievement goals. Participating states have developed and begun to implement their own methods of categorizing schools identified for improvement, and to customize plans for improvement and restructuring based on the individual needs of schools.^v

The peer reviewers who reviewed the 17 state proposals submitted noted that none of the states’ proposed methods of differentiation was without significant limitations, and some appeared to be “largely based on methods of convenience rather than a focus on the underlying causes of schools’ inability to meet AYP.”^{vi} While little information is available regarding preliminary outcomes and lessons under the pilot, a recent report by the Center on Education Policy (CEP) examined four participating states and found that each had tailored their accountability systems to meet local needs “based on what they believe will work best in their states.”^{vii} CEP found several common themes among the four states: each had: adopted fewer and different labels for struggling schools than those provided by NCLB; increased focus on the use of data to inform instruction and decision making; and instituted on-site monitoring for some of their worst schools.

American Recovery and Reinvestment Act – The stimulus law has channeled substantial resources and focused attention on turning around low-performing schools. The Obama Administration has set a national goal of closing 1,000 failing schools each year for the next five years (roughly 5% of all public schools in the U.S.)—yet the tools and the will to do so have long been lacking in many communities.

Recently, U.S. Education Secretary Arne Duncan announced draft requirements for accessing about \$3.5 billion in School Improvement Grants. The Administration would require states to identify three tiers of schools and implement one of the following “rigorous interventions” in each Tier I or Tier II school:

- Turnaround Model – This would include among other actions, replacing the principal and at least 50 percent of the school's staff, adopting a new governance structure and implementing a new or revised instructional program.
- Restart Model – School districts would close failing schools and reopen them under the management of a charter school operator, a charter management organization or an educational management organization selected through a rigorous review process. A restart school would be required to admit, within the grades it serves, any former student who wishes to attend.
- School Closure – The district would close a failing school and enroll the students who attended that school in other high-achieving schools in the district.
- Transformational Model – Districts would address four specific areas: 1) developing teacher and school leader effectiveness, which includes replacing the principal who led the school prior to commencement of the transformational model, 2) implementing comprehensive instructional reform strategies, 3) extending learning and teacher planning time and creating community-oriented schools, and 4) providing operating flexibility and sustained support.

What NCLB Currently Requires ^{viii}

NCLB requires states and districts to undertake a series of interventions to assist students and turn around underperforming schools that consistently miss achievement targets.

Public School Choice and Tutoring Options

Students in schools that do not make AYP for two consecutive years are given the opportunity to transfer to another public school. If a school does not meet AYP for a third consecutive year, students are given the option of receiving supplemental educational services (SES or free tutoring) from state-approved providers. These providers may include districts, nonprofit organizations, and for-profit companies.

The number of students participating in school choice options is small but growing.^{ix} The percentage of eligible students who participated in school year 2006-07 was 15% for SES and 2% for public school choice.^x

School Improvement, Corrective Action, School Restructuring and Other Interventions

In addition to providing public school choice, schools that do not make AYP for two consecutive years are designated for “needs improvement” status. Under this status, schools must develop a school improvement plan that is focused on improving instruction and the knowledge and skills of staff who are responsible for such instruction. If schools continue to miss AYP targets, they are required to offer SES, and subsequently implement more aggressive reforms under “corrective action” and school “restructuring” status.

NCLB School Improvement, Corrective Action and Restructuring Timeline^{xi}

Year 1	Children take assessments, school does not make AYP
Year 2	Children take assessments, school does not make AYP, school identified as “a school in need of improvement”
Year 3	School is in “improvement” status—Year One Public school choice is provided for students in school, transportation costs are provided Only technical assistance is provided during this year; district is not authorized to take corrective actions Children take assessments, school does not make AYP, school identified for “corrective action”
Year 4	School is in “improvement” status—Year Two Districts must provide SES to low-income children in school and continue public school choice
Year 5	School subject to “corrective action,” which requires the district to do one of the following: <ul style="list-style-type: none">• Use an outside expert to analyze the school plan• Implement a new curriculum• Decrease the school’s decision-making• Replace staff relevant to failure• Modify the school schedule Public school choice continues, district must continue technical assistance, SES continue Children take assessments, school does not make AYP
Year 6	School identified for “restructuring” Public school choice continues District must continue to provide SES to low-income children in the school District must begin planning for restructuring actions for following year Children take assessments, school does not make AYP
Year 7	District institutes a restructuring action, which includes one of the following: <ul style="list-style-type: none">• School reopens as a charter• Principal and all or most staff are replaced• Management of the public school is assumed by another entity, e.g., a private company• State assumes management of the school

About the Commission

The Commission on No Child Left Behind is a bipartisan effort to identify and build support for improvements in federal education policy to ensure the Nation has effective tools to spur academic achievement and close the achievement gap. Following a comprehensive review process with extensive public input, the Commission in 2007 released a blueprint for strengthening the landmark No Child Left Behind Act (NCLB) by preserving the law’s core principles and making needed changes to accelerate progress toward achieving its goals, particularly in the areas of teacher and principal effectiveness, robust accountability and data, higher academic standards, stronger high schools, and increased

options for students. The Commission will continue to advocate bold reform during the NCLB reauthorization process and consideration of related measures in pursuit of an excellent education for all children.

The Commission is funded by some of the nation's leading foundations, including the Bill & Melinda Gates Foundation, Carnegie Corporation of New York, the Joyce Foundation, and the GE Foundation. The findings, interpretations, and conclusions expressed in the Commission's work should not be attributed to the donors. To learn more, visit www.nclbcommission.org.

ⁱ Jamar, Steven D. "Brown Fifty Years Later: A Brief History of Brown, HUSL's Role in It, and Its Impact." 7 September 2007. <http://www.brownat50.org/brownChrono/BrownHistory.html>

ⁱⁱ U.S. Department of Education. "Data reflecting the number of schools in improvement, corrective action, and restructuring in school year (SY) 2008-09 based on SY 2007-08 assessments) reported by States in the SY 2007-08 Consolidated State Performance Report (CSPR)." <http://www.ed.gov/programs/statestabilization/schooldata.pdf>

ⁱⁱⁱ Center on Education Policy. "A Call to Restructure Restructuring: Lessons from the No Child Left Behind Act in Five States." September 2008. <http://www.cep-dc.org/index.cfm?fuseaction=page.viewPage&pageID=559&nodeID=1>

^{iv} U.S. Department of Education (2009). Title I Implementation: Update on Recent Evaluation Findings. <http://www.ed.gov/rschstat/eval/disadv/titlei-implementation/titlei-implementation.doc>

^v U.S. Department of Education, "Differentiated Accountability," <http://www.ed.gov/admins/lead/account/differentiatedaccountability/index.html> (accessed August 13, 2009).

^{vi} U.S. Department of Education (2008). "Summary by the Peer Review Team of June 2008 Review of Differentiated Accountability Proposals." <http://www.ed.gov/admins/lead/account/differentiatedaccountability/prsummary.doc>

^{vii} Center on Education Policy. "Mining the Opportunities in "Differentiated Accountability": Lessons from the No Child Left Behind Pilots in Four States." September 2009. <http://www.cep-dc.org/index.cfm?fuseaction=Page.viewPage&pageId=575&parentID=481>

^{viii} The Commission on No Child Left Behind (2007). Beyond NCLB: Fulfilling the Promise to Our Nation's Children. Washington, DC: The Aspen Institute. <http://www.aspeninstitute.org/policy-work/no-child-left-behind/beyond-nclb>

^{ix} U.S. Department of Education (2009). Title I Implementation: Update on Recent Evaluation Findings. <http://www.ed.gov/rschstat/eval/disadv/titlei-implementation/titlei-implementation.doc>

^x U.S. Department of Education (2009). Title I Implementation: Update on Recent Evaluation Findings. <http://www.ed.gov/rschstat/eval/disadv/titlei-implementation/titlei-implementation.doc>

^{xi} The Commission on No Child Left Behind (2007). Beyond NCLB: Fulfilling the Promise to Our Nation's Children. Washington, DC: The Aspen Institute. <http://www.aspeninstitute.org/policy-work/no-child-left-behind/beyond-nclb>