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October 4, 2024

Secretary Cardona  
U.S. Department of Education

Dear Secretary Cardona,

Knowledge Alliance (KA) is pleased to provide comments on the U.S. Department of Education's [draft non-regulatory guidance on School Improvement and Related Provisions](#) under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). Founded in 1971, Knowledge Alliance is a non-profit, non-partisan organization comprised of leading education organizations committed to the greater use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Collectively, KA and its members promote the use of rigorous research to figure out what works to improve student outcomes and then share those findings with policymakers, practitioners, and the general public.

Below, KA provides both general and specific comments, grounded in KA's priorities of research, evidence, technical assistance, and evaluation, to strengthen this guidance so as to better support State educational agency (SEA), local educational agency (LEA), and school leaders in their school improvement efforts. KA consists of 24 member organizations that are education research, evaluation, and technical assistance organizations, many of which work directly with SEAs and LEAs on school improvement through Regional Educational Laboratories (RELs), Comprehensive Centers (CCs), or other means. These comments reflect the collective experience and insight of KA members.

Thank you for the opportunity to offer feedback. Please do not hesitate to reach out with any questions you may have.

Sincerely,



Rachel Dinkes  
President and CEO



Mary Kingston Roche  
Senior Policy Director



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## General Comments

KA appreciates the draft guidance’s strong focus on evidence, particularly the dedicated sub-section on evidence-based interventions within the broader section on support and improvement plans. KA also appreciates the guidance’s emphasis on technical assistance, particularly in clarifying that States must provide technical assistance to each LEA serving a significant number of schools identified for improvement.

**The Department of Education has recent evidence of the need for technical assistance to support evidence-based interventions.** Boosting literacy among school-age children remains a national priority, as nearly one-third of students in the United States lack the foundational reading skills needed for academic success. To address these issues, starting in 2010 Congress invested more than \$1 billion for State literacy efforts through the Striving Readers Comprehensive Literacy (SRCL) program. SRCL was a three-year, direct grant awarded to 11 States, aimed to improve literacy for disadvantaged children by emphasizing evidence-based practices and high-quality literacy instruction. A recently released evaluation [report](#) of the SRCL program revealed three key, disappointing, findings: (1) the goal of targeted funding at disadvantaged students was not fully achieved; (2) there was less focus on literacy programs with rigorous evidence than expected; and (3) the use of evidence-based instructional practices was less widely used than expected.

However, the evaluation found that, in States that provided technical assistance, the program was more likely to have impact. Among the report’s findings was that a comprehensive technical support system is needed to help States and districts select evidence-based literacy programs, implement professional development programs, and target funding.

The Department of Education's (ED's or the Department) Comprehensive Centers (CCs) program is well-positioned to be that support system, in coordination with support from the Regional Educational Laboratories (RELs). Throughout the guidance, and in Section C, Support for School Improvement in particular, KA encourages the Department to elevate the role of regional CCs as important resources to support States and districts in school improvement. CCs provide valuable, responsive support through technical assistance, consulting, and coaching to help States and districts in school improvement, and this guidance is an opportunity to remind States of this important-and free-resource. KA’s specific comments below suggest places in the guidance that CCs could be referenced or elevated for this purpose.



## Specific Comments

### Section A, Identification of Schools

#### A-3. Must a State notify each LEA that serves one or more schools identified for CSI, TSI, or ATSI?

One of the concerns KA member organizations have heard from LEAs is that SEAs publish lists of identified schools and/or provide that information to the press before the LEA has been notified. This causes local confusion and is a negative start to the improvement process. Therefore, KA suggests that the guidance advise States to notify LEAs prior to making information public and encourage the LEAs, in turn, to notify identified schools.

### Section B, Support and Improvement Plans

#### B-4. When should an LEA and school begin developing and implementing the CSI, TSI, or ATSI plan?

KA suggests adding the sentence in bold below to highlight CCs as a resource for LEAs and schools to use in developing their school improvement plans.

Pg. 19, second paragraph: “A State can help LEAs and schools more quickly develop school improvement plans by providing examples of needs assessments, a list of evidence-based interventions, including identifying the underlying issues the interventions are intended to address and their relative effectiveness compared to other interventions, and a forum for LEAs and schools (e.g., office hours with State support specialists, communities of practice that include LEAs and schools that have shown significant growth in the narrowing or elimination of student group achievement gaps) to connect with one another and ask questions. **States can also partner with their Regional Comprehensive Center, which can provide a range of supports to LEAs and schools in the development and implementation of their school improvement plans, including supporting them in taking the actions described above, and more.**

#### B-5. May an LEA or school have a planning year when developing and implementing the CSI, TSI, or ATSI plan?

KA suggests adding the sentence below to highlight the regional CCs and the National Comprehensive Center as resources for LEAs and schools in developing and implementing a planning year.

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At the end of question B-5, -add the following sentence: **“Regional Comprehensive Centers and the National Comprehensive Center may have resources that are helpful for LEAs and schools during the planning year, and a State can direct these resources to those LEAs and schools as available.”**

## **B-6. What partner engagement requirements must an LEA or school meet with respect to the development and implementation of a CSI, TSI, or ATSI plan?**

KA suggests the addition of language on helping stakeholders learn about what makes an intervention or practice “evidence-based” so they can be more knowledgeable when providing input into the development and implementation of a plan.

Pg. 20-add the following suggestion to the list of examples under “LEAs and schools can enhance prospects for meaningful and continuous input and feedback by”:

**“Explaining in an accessible way the meaning of ‘evidence-based’ along with examples, so stakeholders can be well-equipped to help select evidence-based interventions and practices for school improvement. LEAs and schools can refer to the definition of evidence-based in B-10 and ESEA section 8101(21).”**

## **B-8. What should be included in the needs assessment for a school identified for CSI?**

KA suggests including in the needs assessment reference to the early childhood/pre-K opportunities students have. (Later the document clarifies that interventions can include providing for early education, so adding reference to it in the needs assessment will help identified schools think about the problem during assessment of needs/planning). KA also suggests adding to the needs assessment a review of alignment and coherence across selected interventions. Lack of alignment and coherence across implemented interventions has been a long-standing issue (and increasingly post-Covid) with various interventions added that are not necessarily connecting to core standards. Schools that adopt multiple interventions that are disconnected or at cross-purposes can hinder implementation and do not foster improved practices or outcomes.

## **B-10. What are the requirements for evidence-based interventions in support and improvement plans?**

And



## **B-11. How can a State support LEAs and schools in identifying and selecting appropriate evidence-based interventions?**

KA suggests adding to the responses under both B-10 and B-11 an explicit reference to the Regional Educational Labs (RELs) and CCs as resources to help States and districts with understanding the different levels of evidence and with identification of interventions.

## **B-12. How should an LEA or school go about selecting interventions for a school identified for CSI, TSI, or ATSI?**

KA suggests adding the following phrase in bold to emphasize the need for coherence and alignment when selecting an intervention.

Pg. 24: “In selecting interventions, an LEA or school should consider how it can use a combination of evidence-based interventions that work together **coherently** to address the various needs of the identified school.”

KA suggests adding to an LEA or school’s implementation plan consideration of technical assistance needed to effectively implement that plan as well as a process for continuous improvement.

Pg. 24-add the following phrases noted in bold to this sentence:

“After it has selected interventions, an LEA or school should support the interventions by creating a robust implementation plan, **including by identifying any external technical assistance needed to be obtained through the region's Comprehensive Center**, providing adequate resources, regularly gathering information from relevant parties to examine the approach and possible refinements, analyzing outcome data to determine the effectiveness of the intervention, **and implementing a process for continuous improvement.**”

## **B-14. What evidence-based interventions could an LEA or school consider implementing to support learning acceleration as part of CSI, TSI, and ATSI plans?**

KA members would encourage the Department to add high-quality instructional materials (HQIM) as an intervention.

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In *Out-of-School Time*, KA would encourage the Department to note that these programs can also help meet the physical development, health, and nutrition needs of students.

## **B-17. What Departmental resources are available to support States, LEAs, and schools when selecting interventions for CSI, TSI, and ATSI plans?**

KA appreciates the reference to the Comprehensive Centers as a Departmental resource that States, LEAs, and schools can seek out when selecting interventions. KA suggests specific language below to bolster these references.

Pg. 28-Add the following noted in bold to the description of Comprehensive Centers:

“Comprehensive Center Network: The Comprehensive Centers are Department grantees that provide **free-of-charge** capacity-building services to States, regional educational agencies (REAs), LEAs, and schools that improve educational outcomes for all students, close achievement gaps, and improve the quality of instruction. For more information, see: <https://compcenternetwork.org>. **To find your Regional Comprehensive Center, see: <https://compcenternetwork.org/regional-comprehensive-centers>.** The Comprehensive Centers Network includes the Regional Centers and the National Center, which have created many resources to assist in the development of support and improvement plans. For example, the National Center created the resource School Spending and Outcomes Snapshot: Supporting Conversations on Equity and School Improvement, a tool that allows users to view and print data visualizations that can foster thoughtful conversations to improve equity and outcomes in their school communities. This resource is useful for schools, LEAs, and States in identifying resource inequities based on per-pupil expenditure information and is an example of how to identify other resource inequities. Available at: <https://compcenternetwork.org/ssos>. **The National Center also created a [Summer and Afterschool Needs Assessment](#) that SEAs, LEAs and schools can use to plan their summer and afterschool programs.”**

KA also appreciates the reference in this list to the Office of Special Education Programs Technical Assistance Network to support States, LEAs and schools in selecting interventions.

KA suggests adding Regional Educational Laboratories and the following recommended description to the list of Departmental resources available:

Pg. 28-Add the following in bold: **“Regional Educational Laboratories (RELs): The Regional Educational Laboratories, administered by the Institute of Education Sciences, provide free-of-charge research and analytic support to SEAs, LEAs, and schools, aiming to improve educational outcomes for all students,**



close achievement gaps, and improve the quality of instruction. For more information, see: <https://ies.ed.gov/ncee/rel/>, where you can also find your state’s specific Regional Educational Lab.”

## **B-23. What are ways an LEA or school could address resource inequities with respect to access to advanced coursework?**

The Department should consider adding “credentials” to the list of covered or reimbursed expenses.

## **Section C, Support for School Improvement**

### **C-6. What resources should a State consider during its periodic review of resource allocation in each LEA serving a significant number or percentage of schools identified for CSI, TSI, or ATSI?**

The response to this question includes a recommendation about considering local and state funding in resource allocation. However, KA would suggest that this recommendation be elevated to its own separate question, given the importance of factoring in local and state funding in resource allocation and the fact that it is easily misunderstood.

### **C-13. Must a school identified for CSI replace its previously implemented evidence-based interventions after it does not meet exit criteria?**

KA appreciates in the Department’s response to this question the encouragement of schools and LEAs to “regularly evaluate their school improvement efforts.” KA would encourage the Department to note that a school that does not meet exit criteria should measure implementation of the evidence-based interventions, not just increase the intensity of the interventions or combine interventions so as to be more rigorous. Implementation fidelity is a critical component of an evidence-based intervention.

## **Section D, Exit Criteria**

### **D-3. Must a State examine multiple years of data when determining if a school identified for CSI or ATSI has met exit criteria?**

KA suggests that the Department clarify that the improvement expectation is based on cross-sectional (not longitudinal) data.

## D-4. When assessing the performance of a school identified for CSI or ATSI against exit criteria, what does it mean to have improved “student academic achievement”?

KA urges the Department to spell out “SQSS” as this is the first time it is mentioned in the guidance.

## Section E, School Improvement Funds Under ESEA Section 1003

### E-29. What planning activities may be supported with section 1003 funds?

High-quality instructional materials should not only be supplemental, but core as well. KA encourages the Department to add “core and” to the bullet below.

Pg. 66-**Instructional Programs:** Plan and implement evidence-based academic acceleration, support, interventions, and enrichment programs for students; identify and purchase (or support teachers in developing) **core and** supplemental evidence-based instructional materials that are aligned with the State’s challenging academic standards.

## Section F, Direct Student Services Under ESEA Section 1003A

### F-3. With whom must a State consult prior to reserving funds for direct student services?

KA encourages the Department to add additional information about how and when an SEA might conduct consultations regarding the provision of the direct student services.

### F-16. May funds awarded for direct student services be used to cover the costs of fees for AP or IB examinations?

KA recommends that the Department include fees associated with career and technical education (CTE) costs. KA members acknowledge that, while Perkins funds can be used to cover fees for credentials, Perkins funding is much smaller than Title I funding and, additionally, some LEAs do not choose to use Perkins funds to cover fees for credentials.